

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

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

*Plaintiff,*

v.

**NATIONAL PARK SERVICE;**

**JESSICA BOWRON, in her official capacity as  
ACTING DIRECTOR, NATIONAL PARK  
SERVICE;**

**JOHN STANWICH, in his official capacity as  
SUPERINTENDENT, THE WHITE HOUSE  
AND PRESIDENT’S PARK;**

**DEPARTMENT OF THE INTERIOR;**

**DOUGLAS BURGUM, in his official capacity  
as SECRETARY OF THE INTERIOR;**

**GENERAL SERVICES ADMINISTRATION;**

**MICHAEL J. RIGAS, in his official capacity as  
ACTING ADMINISTRATOR, GENERAL  
SERVICES ADMINISTRATION; and**

**DONALD J. TRUMP, in his official capacity as  
PRESIDENT OF THE UNITED STATES,**

*Defendants.*

Civil Action No. 25-4316

**MOTION FOR TEMPORARY RESTRAINING ORDER  
AND PRELIMINARY INJUNCTION**

The defendants in this action—the National Park Service; Jessica Bowron, in her official capacity as Acting Director of the National Park Service; John Stanwich, in his official capacity as Superintendent of the White House and President’s Park; the Department of the Interior; Douglas Burgum, in his official capacity as Secretary of the Interior; the General Services Administration; Michael J. Rigas, in his official capacity as Acting Administrator of the General

Services Administration; and Donald J. Trump, in his official capacity as President of the United States (collectively, the “Defendants”)—have begun to construct a ballroom (the “Ballroom”) on the former site of the East Wing of the White House, which the Defendants demolished in late October 2025. As explained in the memorandum accompanying this motion, the demolition of the East Wing and the construction of the Ballroom violate numerous federal statutes, as well as the Constitution.

Pursuant to Federal Rule of Civil Procedure 65(b) and Local Civil Rule 65.1(a), plaintiff, the National Trust for Historic Preservation in the United States (the “National Trust”) moves for an order temporarily enjoining the Defendants from engaging in further construction of the Ballroom. The National Trust further moves, pursuant to Federal Rule of Civil Procedure 65(a) and Local Civil Rule 65.1(c), for a preliminary injunction against the Defendants prohibiting the same. The National Trust requests a hearing on its motion, and the commencement of construction of the Ballroom makes expedition essential. *See* Local Civil Rule 65.1(d).

For the reasons stated in the accompanying memorandum, the National Trust is likely to succeed on each of its claims, and the remaining factors—irreparable harm, balance of the equities, and the public interest—all weigh heavily in its favor. The National Trust therefore respectfully requests that the Court grant its motion; issue a temporary restraining order and, thereafter, a preliminary injunction; and issue any further relief as the Court deems just and warranted.



Dated: December 12, 2025

Respectfully submitted,

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**LOCAL RULE 65.1 CERTIFICATE**

Pursuant to Local Rule 65.1(a), I certify that on December 12, 2025, I notified Defendants of this motion for a temporary restraining order by email sent to the Defendants or their representatives, at the time of the filing of this motion, at the following email addresses:

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I further certify that copies of all pleadings and papers filed in this action to date or to be presented to the Court at a hearing on this motion have been transmitted to Defendants via overnight mail to the following addresses:

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**CERTIFICATE OF SERVICE**

Pursuant to Local Rule 5.3, I hereby certify that on December 12, 2025, I filed the foregoing document with the Clerk of Court for the United States District Court for the District of Columbia using the court's CM/ECF filing system.

Further, I hereby certify that I have provided notice of this lawsuit by submitting via email the foregoing document to the following recipients:

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PRESIDENT OF THE UNITED STATES,**

*Defendants.*

Civil Action No. 25-4316

**PLAINTIFF'S MEMORANDUM OF LAW IN SUPPORT OF ITS  
MOTION FOR TEMPORARY RESTRAINING ORDER  
AND PRELIMINARY INJUNCTION**

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White House, Press Secretary Karoline Leavitt Briefs Members of the Media, Oct. 23, 2025, YouTube, <a href="https://www.youtube.com/watch?v=ILRc5r9msso">https://www.youtube.com/watch?v=ILRc5r9msso</a> .....	13, 16, 19

## INTRODUCTION

In late October 2025, the Defendants in this action, at the behest of President Donald J. Trump, demolished the East Wing of the White House to make room for a 90,000-square-foot ballroom (“Ballroom”) on the site. They did so without submitting their plans for the project (“Ballroom Project”) to the two federal commissions—the National Capital Planning Commission (“NCPC”) and the Commission of Fine Arts (“CFA”)—that are required by federal statute and regulations to review federal development projects in the District of Columbia. They did so without seeking or obtaining the approval of Congress, which must expressly authorize any project built on federal parkland in the District. And they did so without conducting an adequate environmental review of the Ballroom Project, which has so far involved, among other things, major physical disruption to federal parkland of tremendous national significance and the dumping of potentially contaminated debris from the East Wing at another public park.

The Defendants have not only violated the law in many separate ways; they have also deprived the public of the critical opportunity to comment and provide input on perhaps the most substantial exterior alteration to the country’s most recognizable and historically significant building since it was reconstructed after being burned during the War of 1812. This illegal activity continues today, and further harm mounts unabated: In recent days, ready-to-install construction materials and heavy construction machinery have been moved onsite to begin active building. *See* Declaration of Gregory B. Craig (“Craig Decl.”), Ex. A at 8; Ex. B at 3. The site now features a towering construction crane anchored to a concrete paddock. *See* Craig Decl., Ex. A at 8. On December 2, President Trump told his cabinet that the pile drivers operate “all night.” *Id.*

Plaintiff, the National Trust for Historic Preservation in the United States (“National Trust”), is a private charitable, educational non-profit corporation chartered by Congress in 1949.

Declaration of Elizabeth S. Merritt (“Merritt Decl.”), ¶ 2. The statutory purpose of the National Trust is unambiguous: to further the historic preservation policy of the United States and to promote the public’s awareness of and ability to comment on any activity that might damage or destroy our nation’s architectural heritage. *See* 54 U.S.C. § 312102. To that end, the National Trust works to advance historic preservation efforts and public involvement in historic preservation across the country. *See* Merritt Decl. ¶¶ 3-8. That work has involved participating in public commentary with and bringing historic preservation suits across—and against—numerous Presidential administrations. *See id.* ¶¶ 3-7.

The National Trust brought this action to compel the Defendants to at minimum comply with the procedural requirements that inform and protect the public’s opportunity to comment on the Ballroom Project. The National Trust requests a temporary restraining order (“TRO”) and, thereafter, a preliminary injunction preventing the Defendants from continuing work on the Ballroom Project until they have (1) submitted plans to the NCPC and the CFA, and received comments and approval from the agencies, as required by law, (2) conducted and published adequate environmental reviews, as required by law, (3) permitted public comment on both the project plans and the environmental reviews, as required by law, and (4) received express authorization from Congress to construct the Ballroom, as required by law.

The Court should grant the National Trust’s motion. The National Trust is likely to succeed on the merits of its claims. *First*, federal law is clear: the NCPC and the CFA must review (and the NCPC must also affirmatively approve) proposed federal development projects *before* the project plans are finalized or work has begun. *See* 40 U.S.C. §§ 8721-8722, 9102; *see also* 45 C.F.R. §§ 2101.1-2101.2. In accordance with those requirements, projects of much lesser significance—including projects to improve the White House grounds undertaken by each of the two prior



administrations—have routinely been timely submitted to the NCPC and the CFA. Construction on the Ballroom Project is now well underway, yet no plans for the project have been submitted to either commission. *See* Craig Decl., Ex. A at 8; Ex. B at 3.

Additionally, to the extent the Defendants contend there was no need to obtain NCPC and CFA review of the East Wing demolition because it did not involve any affirmative construction, this is both incorrect as a matter of law and irrelevant in light of the continued construction work currently underway at the former site of the East Wing.

*Second*, continued construction at the East Wing site violates the statutory prohibition on any “building or structure” being “erected on any reservation, park, or public grounds of the Federal Government in the District of Columbia without express authority of Congress.” 40 U.S.C. § 8106. There is no dispute that the Defendants have not obtained such approval.

*Third*, the National Trust is likely to succeed on its NEPA claims. For any major federal action that has the potential to significantly affect the “human environment,” 42 U.S.C. § 4332(2)(C), NEPA requires the federal government to follow certain procedures before it can take the proposed action. These include at minimum publishing an environmental assessment, and for most large projects also publishing a more detailed environmental impact statement. *See id.* §§ 4332(2)(C), 4336(b). Despite the large scale of the Ballroom Project—and the obvious attendant environmental impacts from the destruction of an historic urban building, the effects of its demolition and potential replacement on the historic federal parkland surrounding the White House, and the dumping of potentially contaminated building materials dating from as early as the beginning of the twentieth century at a public park—the Defendants have not published either report.

The remaining factors—irreparable injury, balance of equities, and the public interest—also favor granting the National Trust’s motion. Depriving the NCPC and the CFA of access to project plan information whose disclosure is mandatory—and foreclosing any opportunity for the public to comment on or participate in those plans—are injuries already being suffered by the National Trust and the American people. That denial continues today without interruption. The public has a compelling interest in being able to comment on the Ballroom Project before it progresses further; being denied the opportunity to be heard is injury enough—notwithstanding the devastating aesthetic, cultural, and historical harms flowing from the Defendants’ actions. These injuries will only be exacerbated if the Defendants’ continued disregard of their statutory obligations results in an unreviewed and radical transformation of the White House caused by the addition of a palatial ballroom that dwarfs all that surrounds it.

The equities weigh overwhelmingly against these Defendants. The Defendants have already caused irreversible damage to the White House and its grounds without respecting or complying with standard review processes that are both applicable and routine. The Defendants have no legally cognizable or protected interest in maintaining the current illegitimate course. Preliminary relief would merely require the Defendants to do what they should have done in the first place: request review and approval of the Ballroom Project from the appropriate authorities, prepare and publish an adequate environmental assessment and environmental impact statement, and give the public an opportunity to comment.

## **BACKGROUND**

### **I. The East Wing of the White House.**

The White House is the official residence of the President of the United States. Conceived by the capital’s initial planner, Pierre Charles L’Enfant, as a grand presidential palace, the White

House owes its modest yet iconic profile to James Hoban, whose winning submission to an architectural competition served as the plans for the new building. *See* Craig Decl., Ex. C at 70. Construction of the White House according to Hoban's plans began during the presidency of George Washington. *See id.* In 1800, President John Adams moved into the still-unfinished building; the next year, he was succeeded in the presidency—and in the White House—by Thomas Jefferson. *See id.* at 70-71. President Jefferson took an active interest in the building, and he oversaw the addition of early versions of the White House's east and west colonnades. *See id.*; Craig Decl., Ex. D at 45, 48-49.

The East and West Wings were built at the ends of reconstructed colonnades in 1902. Craig Decl., Ex. E at 2-3. The West Wing was constructed as an executive office building, *see id.* at 2; today, it houses the Oval Office, the Cabinet Room, and office space for the President and executive staff. The East Wing initially served as a receiving area for visitors and guests attending functions at the White House. *See id.* at 2-3. By the 1930s, it had taken on its principal modern role as the center of operations for the First Lady, with Eleanor Roosevelt using the space for official functions and news conferences, and subsequent presidential spouses likewise keeping staff and offices in the building. Craig Decl., Ex. F at 5-6; Ex. G at 5. Renovations in 1942 enlarged the East Wing by adding a second story and an underground bunker, and converted some of the existing space into a small movie theater. *See* Craig Decl., Ex. E at 3; Ex. G at 2-4. For eighty-three years, the East Wing's function and exterior appearance remained unchanged until—without warning or notice—the Defendants demolished the building in its entirety in October 2025. *See* Craig Decl., Ex. H.

The East Wing abutted the Jacqueline Kennedy Garden, which was originally constructed in 1903 and dedicated to the former First Lady in 1965. *See* Craig Decl., Ex. I at 2. The Jacqueline

Kennedy Garden balanced the Rose Garden on the west side of the White House and was used to host receptions. *See id.* Along with the entirety of the East Wing structure, the Defendants demolished the Jacqueline Kennedy Garden in October 2025. *See* Craig Decl., Ex. H at 2.

## **II. President Trump Announces Plans to Build the Ballroom.**

On July 31, 2025, the White House issued a press release (the “July 2025 Press Release”) announcing plans to build a large ballroom (“Ballroom”), long desired by the President, on the White House grounds. *See* Craig Decl., Ex. J; *see also* Ex. K at 6. The press release stated that the Ballroom would be located on the site of the East Wing, which it described as a “small, heavily changed, and reconstructed” building that had been “renovated and changed many times.” Craig Decl., Ex. J at 2. The Ballroom would be “approximately 90,000 total square feet”—much larger than the 55,000-square-foot White House, *see* Craig Decl., Ex. L at 2—and would have “a seated capacity of 650 people.” Craig Decl., Ex. J at 1. Included with the press release were six images, five of which depicted a massive structure, presumably the Ballroom, on the site of the East Wing. *See id.* at 2-3. As shown in the renderings, the Ballroom was substantially larger than the East Wing and overshadowed the central residence. *See id.* The sixth image depicted what was presumably the interior of the Ballroom—a large room with oversized windows and gold trim on the ceiling. *See id.* at 3.

The July 2025 Press Release also announced that an architect, lead contractor, and lead engineer—McCrery Architects, Clark Construction, and AECOM, respectively—had been hired. *Id.* at 1-2. It stated that construction on the Ballroom Project would “begin in September 2025” and was “expected to be completed long before the end of President Trump’s term” in January 2029. *Id.* at 2.

Although the renderings of the Ballroom clearly depicted a new structure on the site of the East Wing, the July 2025 Press Release did not specify whether the East Wing would be razed to accommodate the Ballroom or would instead be integrated into the larger structure. *See id.* However, at a press conference held the same day that the press release was issued, President Trump stated that the Ballroom “wo[uldn’t] interfere with the current building,” of which he was “the biggest fan.” Craig Decl., Ex. M at 2. The President further stated that the Ballroom would “pay[] total respect to the existing building” and would “be near it, but not touching it.” *Id.*

### **III. The Defendants Fail to Submit the Ballroom Project to the NCPC, the CFA, and Congress for Review, and Fail to Prepare an Environmental Impact Statement.**

Like nearly all major federal development projects in the District of Columbia, the Defendants’ Ballroom Project was required to be submitted to two federal commissions for review. The first of those commissions, the NCPC, serves as the central planning agency in the District of Columbia and reviews proposed federal projects for consistency with the NCPC’s comprehensive plan for development in the capital district and its environs. *See* 40 U.S.C. §§ 8711(e)(2), 8722(b), 8722(d). The second, the CFA, was established by Congress to advise on matters of fine art and reviews proposed projects’ visual appearance. *See* 40 U.S.C. § 9102(a); 45 C.F.R. § 2101.1(a)(1).

Both the NCPC and the CFA require federal agencies to present their proposed projects for review *before* project plans are finalized, and *before* any work on the project is begun. *See* 40 U.S.C. § 8722(b) (requiring the agency to “advise and consult” with the NCPC about its proposed project “before preparing construction plans.”); 45 C.F.R. § 2101.1(a)(1) (requiring the agency to seek the CFA’s advice “on the plans and on the merits of the designs” before the plans’ “final approval”); *id.* § 2102.10(a) (requiring “submission when concept plans for the project are ready but before detailed plans and specifications or working drawings are prepared”).

During these review processes, the public is given the opportunity to express its opinions about the proposed project. Members of the public may, for instance, submit comments on pending projects on the commissions' websites; attend the commissions' meetings, which are open to the public; and speak at those meetings to present their views. *See* 45 C.F.R. §§ 2102.1, 2102.4; NCPC, How to Comment <https://www.ncpc.gov/participate/guidelines/#written> (last accessed Dec. 11, 2025); Commission of Fine Arts, Submit a Comment, <https://www.cfa.gov/submit-public-comment> (last accessed Dec. 11, 2025). This robust forum for public input prior to and during the review by the commissions ensures that the public has an opportunity to make its concerns about a project known to the NCPC, the CFA, and the agency proposing the project, and enables those entities to take those concerns into account before work on the project has begun.

In addition to review by the NCPC and the CFA, the Ballroom Project was subject to at least two other review requirements. First, federal projects that propose to “erect[]” a “building or structure” on any federal “reservation, park, or public grounds” within the District of Columbia must be “express[ly] author[ized]” by Congress. 40 U.S.C. § 8106. Because President’s Park, in which the White House and its grounds are located, is a federal park managed by defendant the National Park Service, *see* Craig Decl., Ex. N, Ex. O, the Defendants were required to obtain separate and express Congressional approval for the Ballroom Project. 40 U.S.C. § 8106. Second, the Ballroom Project, like all “major Federal actions,” must be reviewed by the agency responsible for the project under NEPA for its “effects on the quality of the human environment.” 42 U.S.C. § 4332(2)(C).

The July 2025 Press Release gave no indication that the Defendants planned to ignore these required review processes. Rather, the press release announced that “President Trump ha[d] held several meetings with members of the White House Staff, the National Park Service, the White

House Military Office, and the United States Secret Service to discuss design features and planning,” Craig Decl., Ex. J at 1—meetings which, in the normal course, would be followed by the legally required submission of design plans for the Ballroom Project to the NCPC and the CFA. It also quoted the White House Chief of Staff, Susie Wiles, as saying that “[t]he President and the Trump White House are fully committed to working with the appropriate organizations”—which would include, at minimum, the NCPC, the CFA, and Congress—“to preserv[e] the special history of the White House.” *Id.* at 2.

Despite these assurances, and despite construction on the Ballroom Project being proposed to start in September 2025, *see id.*, none of the individuals or agencies responsible for the Ballroom Project submitted plans for the project to the NCPC or the CFA, or sought Congressional approval, during the months following the July 2025 Press Release. Instead, the Defendants proceeded to develop the Ballroom Project without the required reviews. In July 2025, President Trump appointed William Scharf to be Chairman of the NCPC. *See* Craig Decl., Ex. P at 1. Mr. Scharf, a lawyer and aide to President Trump, lacked any apparent architectural or city-planning experience, but opined in September 2025 that the NCPC “deal[t] with . . . essentially construction, vertical build”—not demolition. Craig Decl., Ex. Q at 1; *see* Craig Decl., Ex. R. At a dinner for donors on or about October 15, 2025, President Trump said that he had been told by “two men” that he did not need any approvals or permits but rather, as President, could “do anything [he] want[ed]” to the White House. Craig Decl., Ex. S at 1-2.

During this time, the planned size of the Ballroom, already out of proportion to the rest of the White House, appeared to increase substantially. On September 13, 2025, President Trump stated in an interview with NBC News that he was “making [the Ballroom] a little bigger.” Craig Decl., Ex. T at 1. Under the President’s new plan, the Ballroom would accommodate 900 people—

more than a 30 percent increase from the 650-person capacity announced in the July 2025 Press Release. *Id.* The size of the proposed new Ballroom increased further in October 2025, as the President, while speaking to a group of donors, stated that it would now be capable of accommodating nearly 1,000 people. Craig Decl., Ex. U at 1.

The size and shifting plans for the proposed Ballroom, along with the lack of review by the NCPC and the CFA, caused concern among architectural groups and the public. In an August 5, 2025 letter, the American Institute of Architects urged defendant John Stanwich, Superintendent of President’s Park and Executive Secretary of the Committee for Preservation of the White House, “to allocate the time necessary for a rigorous process” and “ensur[e that] decisions” concerning the White House were “made with the utmost care and consideration.” Craig Decl., Ex. V at 2. Similarly, in an October 16, 2025 statement, the Heritage Conservation Committee of the Society for Architectural Historians “expresse[d] great concern” over the proposed ballroom addition to the White House, and requested that a comprehensive preservation review be undertaken; that the impacts of the Ballroom Project on the White House grounds be evaluated; and that the broader national impacts on historic preservation be considered. Craig Decl., Ex. W at 1-2.

#### **IV. The Defendants Demolish the East Wing.**

The Defendants did not submit a plan for the Ballroom Project to the NCPC for review and approval; they did not seek review from the CFA; they did not consult or seek approval from Congress; they deprived the public of any opportunity to comment; they published no environmental studies. They forged ahead nonetheless.

On October 20, 2025, President Trump posted a statement to social media announcing that “ground ha[d] been broken on the White House grounds to build the new, big, beautiful White House Ballroom.” Craig Decl., Ex. X. President Trump stated that “the East Wing”—which he



characterized as “[c]ompletely separate from the White House itself”—was “being fully modernized as part of this process, and will be more beautiful than ever when it is complete!” *Id.* During a press conference in the East Room of the White House that same day—while destruction of the East Wing was actually underway—President Trump confirmed that the demolition of the East Wing was happening “right behind us” and “might [be] hear[d] periodically.” Craig Decl., Ex. Q at 1.

The East Wing has now been demolished. Photographs have been published depicting heavy machinery tearing down the East Wing’s façade. *See* Craig Decl., Ex. Y. Reports appeared detailing how portions of the East Wing’s roof had been destroyed and heavy machinery had torn through its interior. Craig Decl., Ex. H, M.

The unexpected and previously unannounced demolition of the East Wing heightened public concern about the Ballroom Project. *See, e.g.,* Craig Decl., Ex. Z. The Defendants did not, however, pause the demolition to seek, however belatedly, the required reviews. Rather, on October 21, 2025, the White House issued a press release (“October 2025 Press Release”) minimizing and dismissing the public’s concerns. *See* Craig Decl., Ex. AA. The October 2025 Press Release asserted that critics were “manufactur[ing] outrage” over President Trump’s “visionary addition of a grand, privately funded ballroom to the White House.” *Id.* The press release did not explain why the Defendants had begun work on the Ballroom Project without submitting plans for review and public comment, as they were required to do by law, or specify when—if at all—the Defendants intended to submit plans for such review and comment. *See id.*

The next day, October 22, while the destruction of the East Wing continued, President Trump showed renderings of the Ballroom to members of the press and other persons gathered in the White House for a separate meeting. *See* Craig Decl., Ex. BB; *see also* Associated Press, LIVE:

Trump holds meeting with NATO Secretary-General Mark Rutte, YouTube, <https://www.youtube.com/watch?v=kT8w6f5k2u4> (last accessed Dec. 11, 2025) [hereinafter “October 22 Oval Office Video”]. A three-dimensional model of the White House appeared on a table in front of President Trump displaying the Ballroom on the former site of the East Wing. *See* Craig Decl., Ex. M. While showing the renderings of the Ballroom to reporters, President Trump stated that the East Wing was “a very small building” that was “never thought of as being much.” October 22 Oval Office Video, at 14:53. “Over the years, many presidents have made changes,” President Trump claimed. *Id.* at 16:23. “This,” he continued, referring to the ongoing razing of the East Wing, “obviously would be the biggest change.” *Id.* President Trump did not explain why it had been determined that the East Wing would have to be razed to accommodate the Ballroom except to say that, “[i]n order to do it properly, we had to take down the existing structure.” *Id.* at 17:20. Again, he gave no explanation for why the required planning processes had not been followed; nor did he give any date as to when the project’s plans would be submitted for review. *See id.* at 14:00-18:27.

The updated renderings of the Ballroom displayed by President Trump in October 2025 showed marked differences from the images in the July 2025 Press Release, including the number of large exterior windows, the number of columns in the proposed northeast portico, and the design of the staircase leading from the Ballroom to the South Lawn. *See* Craig Decl., Ex. BB at 3-5. Other aspects of the October renderings suggested a haphazard design process—the exterior trim of two windows appeared to collide, for instance, and a set of stairs led to no apparent landing. *See id.* at 6.

Within days, the Defendants had demolished the entirety of the East Wing. Aerial photographs taken on October 23, 2025, depicted cleared space where the East Wing previously

stood, and photographs from the White House grounds taken at around the same date showed the demolition of nearly the entire East Wing and east colonnade. *See* Craig Decl., Ex. H at 5-6. Debris from the demolished East Wing was dumped at a public park in Washington, D.C., with no apparent efforts taken to address the possible hazards that the material might pose to the environment. *See id.* at 4.

Press Secretary Karoline Leavitt reinforced that the demolition of the East Wing was an essential and integral part of the Ballroom Project, stating that “the President heard counsel from the architects and the construction companies who said that in order for this East Wing to be modern and beautiful for many, many years to come, for it to be a truly strong and stable structure, this phase one that we’re now in”—presumably a reference to the demolition of the East Wing—“was necessary.” *See id.*; *see also* The White House, Press Secretary Karoline Leavitt Briefs Members of the Media, Oct. 23, 2025, 22:48, YouTube, <https://www.youtube.com/watch?v=ILRc5r9msso> (last accessed Dec. 11, 2025) [hereinafter “October 23 Press Conference Video”].

**V. The Defendants Continue Construction of the Ballroom Without Submitting Plans to the NCPC, the CFA, or Congress for Review.**

Although more than a month has passed since the demolition of the East Wing, the Defendants have still not submitted plans to the NCPC, CFA, or Congress for review and approval. The Ballroom Project was not reviewed at the NCPC’s December, 4 2025 meeting. The Ballroom Project is also absent from the NCPC’s published list of projects anticipated for review over the next six months. *See* Craig Dec., Ex. CC at 4. Nor have the Defendants submitted the Ballroom Project to the CFA; instead, on or about October 28, 2025, President Trump dismissed all six of the CFA’s sitting members. *See* Craig Decl., Ex. DD. He has appointed no replacements. *See* Craig Decl., Ex. EE at 1-2. The Defendants have never acknowledged their obligation to obtain express approval for the Ballroom Project from Congress, let alone taken steps to do so.

Rather, the Defendants have continued work at the site of the East Wing. Public reporting describes the location of the former East Wing as “a bustling project site . . . almost entirely fenced off from public view contain[ing] dozens of workers and materials ready to be installed, including reinforced concrete pipes and an array of cranes, drills, pile drivers and other heavy machinery.” Craig Decl., Ex. B at 3. And President Trump continues to play a hands-on role in the Ballroom Project, “holding frequent meetings about its design and materials,” *id.* at 2, clashing with the project’s lead architect over his desired size of the ballroom, *id.*, and reportedly telling people working on the project “that they did not need to follow permitting, zoning or code requirements because the structure is on White House grounds,” Craig Decl., Ex. K at 4.

In recent days, heavy construction machinery and construction materials, including concrete pipes, pile drivers, and drills, have been installed at the site. Craig Decl., Ex. B at 3; Ex. A at 8. A construction crane anchored to a concrete paddock now towers above the fences surrounding the site of the former East Wing. Craig Decl., Ex. A at 8. On December 2, President Trump told his cabinet that the pile drivers operate “all night,” and that he had rebuffed requests from the First Lady to cease the pounding, telling her: “Sorry, darling, that’s progress.” *Id.* The Defendants now appear poised to construct the Ballroom, in a form known only to them and their contractors.

### **ARGUMENT**

“A TRO is a temporary measure to preserve the *status quo ante* during the pendency of proceedings for preliminary or permanent injunctive relief.” *AIDS Vaccine Advoc. Coal. v. U.S. Dep’t of State*, No. 25-5046, 2025 U.S. App. LEXIS 4611, at \*3 (D.C. Cir. Feb. 26, 2025); *see also Univ. of Tex. v. Camenisch*, 451 U.S. 390, 395 (1981) (holding that TROs serve “to preserve the relative positions of the parties” until a court can adjudicate the merits of a dispute). A preliminary

injunction, in turn, “preserve[s] the status quo pending the outcome of litigation.” *Cobell v. Kempthorne*, 455 F.3d 301, 314 (D.C. Cir. 2006) (quoting *Dist. 50, United Mine Workers of Am. v. Int’l Union, United Mine Workers of Am.*, 412 F.2d 165, 168 (D.C. Cir. 1969)).

To obtain either form of preliminary relief, the National Trust must show that: “(1) it is ‘likely to succeed on the merits’; (2) it is ‘likely to suffer irreparable harm in the absence of preliminary relief’; (3) ‘the balance of equities tips in [its] favor’; and (4) that the preliminary relief sought ‘is in the public interest.’” *Bayer HealthCare, LLC v. U.S. FDA*, 942 F. Supp. 2d 17, 23 (D.D.C. 2013) (quoting *Winter v. NRDC, Inc.*, 555 U.S. 7, 20 (2008)); see also *id.* (noting that the legal standard governing the issuance of preliminary injunctions “also applies to temporary restraining orders”). The National Trust easily satisfies each of those requirements.

#### **I. The National Trust Is Likely to Succeed on the Merits of its Claims.**

“A movant may show a likelihood of success on the merits by demonstrating that it is ‘more likely than not’ that [the movant] will prevail.” *Advance Am. Cash Advance Ctrs., Inc. v. FDIC*, Civ. Action No. 14-953, 2017 U.S. Dist. LEXIS 27887, at \*8 (D.D.C. Feb. 23, 2017) (quoting *Sherley v. Sebelius*, 644 F.3d 388, 398 (D.C. Cir. 2011)).<sup>1</sup> Where, as here, “multiple causes of action are alleged, plaintiff need only show likelihood of success on one claim to justify injunctive relief.” *Kirwa v. United States DOD*, 285 F. Supp. 3d 21, 35 (D.D.C. 2017).

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<sup>1</sup> Under the D.C. Circuit’s sliding-scale approach, a movant who demonstrates “a strong showing on one factor could make up for a weaker showing on another,” such that where other factors weigh heavily in favor of the plaintiff, they need only raise a “serious legal question” on the merits. *Sherley v. Sebelius*, 644 F.3d 388, 398 (D.C. Cir. 2011). Because the National Trust’s claims easily satisfy each of the four prongs, it need not rely on the D.C. Circuit’s sliding scale to prevail on this motion. Even if the National Trust had not made a strong showing of success on the merits, the other factors—specifically the irreparable harm and the injury to the public interest caused by the construction of a massive ballroom on the grounds of perhaps the most recognizable public building in the United States without any public input—would favor preliminary relief.

The National Trust meets that standard here. Indeed, while the National Trust need only demonstrate a likelihood of success on a single claim, it is “more likely than not” to prevail on *all* of its claims.

**A. The Defendants’ Failure to Submit Plans for the Ballroom Project to the National Capital Planning Commission for Review Violates the APA.**

The Defendants have razed the East Wing of the White House. They have developed plans to construct a significant structure on federal public land, implicating statutorily mandated consultations and reviews. And, proceeding with alacrity to carry out the President’s demands, they have flouted those statutory obligations, including consultation with the NCPC. The APA provides for judicial review of such “agency action unlawfully withheld,” 5 U.S.C. § 706(1), and action “not in accordance with law,” *id.* § 706(2)(A).<sup>2</sup> The Defendants have argued that the NCPC’s jurisdiction is limited to “construction”—which they have unilaterally defined as “vertical build”—disclaiming any jurisdiction to review *demolition*. That distinction defies logic and is entitled to no deference. *See Loper Bright Enters. v. Raimondo*, 603 U.S. 369 (2024). The Defendants have themselves acknowledged that destroying the East Wing was and is a central and requisite element of the plan to build the Ballroom. *See, e.g.* October 22 Oval Office Video, at 17:20; October 23 Press Conference Video, at 22:48.

1. The Defendants’ demolition and construction at the White House may not proceed without NCPC review.

Federal agencies that “originate[ plans] for proposed developments and projects” that “affect the plan and development of the National Capital” must “advise and consult” with the NCPC with respect to those plans. 40 U.S.C. § 8722(b)(1). Specifically, such federal agencies must

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<sup>2</sup> The National Trust does not assert APA claims against President Trump, *see Franklin v. Massachusetts*, 505 U.S. 788, 800-01 (1992), and uses “Defendants” in sections I.A.-D. to refer only to those defendants against which it asserts APA claims.

“advise and consult with the Commission” both “*before* preparing construction plans” and “*as* the agency prepares plans and programs in preliminary and successive stages.” *Id.* (emphases added). Moreover, beyond the requirement to consult, the agency must also secure the NCPC’s *approval* of various aspects of the project, namely its “location, height, bulk, number of stories, and size . . . and the provision for open space in and around” the proposed development. *Id.* § 8722(d).

These statutory obligations plainly apply to the Ballroom Project. The Defendants are federal agencies, heads or senior officials thereof, and an executive department (the Department of the Interior) having authority over a defendant agency (the National Park Service). The Ballroom is a major building—a “proposed development[]” or “project”—that will be located in the heart of the District of Columbia and will “affect the plan and development of the National Capital.” *Id.*

Nevertheless, the Defendants have commenced work on the Ballroom Project without submitting a plan to the NCPC, much less obtaining the approval required by § 8722(d). They have therefore deprived the NCPC of the opportunity to review and provide input on the project and planning phases of the Ballroom Project. Even more critically, by evading NCPC review, they have also deprived the National Trust and the general public of the opportunity to participate in the reshaping of one of America’s most treasured and iconic cultural landmarks.

The NCPC’s review of the Ballroom Project is statutorily required for a second, separate reason. The Defendants’ Ballroom Project alters the NCPC’s Comprehensive Plan for the capital district. *See* 40 U.S.C. § 8721(a) (requiring that “the [NCPC] shall prepare and adopt a comprehensive, consistent, and coordinated plan for the National Capital”). And “before . . . any revision [to the Comprehensive Plan] is adopted,” the NCPC “shall present the . . . revision” for comment by affected government bodies. *Id.* § 8721(e)(1). The NCPC may provide for public

input through any of “public hearings, meetings, or conferences, exhibitions, and publication of its plans.” *Id.* § 8721(e)(2). It must also act “jointly” with the Mayor to “establish procedures for appropriate meaningful continuing consultation” regarding the revision to the Comprehensive Plan. *Id.* § 8721(h)(1).

The Ballroom Project is an attempt to revise the Comprehensive Plan by fiat, without any of these processes having taken place. The White House is a key element of the Comprehensive Plan. The Comprehensive Plan explains that the capital district’s “iconic cityscape is distinguished through the close relationship between its form and the functional and visual symbols of national civic life.” Comprehensive Plan for the National Capital: Federal Elements, 50 (2024), available at Comprehensive Plan, NCPC, <https://www.ncpc.gov/plans/compplan/> (last accessed Dec. 11, 2025). This “symbolic identity,” the Comprehensive Plan states, “expresses itself in a number of ways,” including a visual hierarchy “that emphasizes symbols and structures, particularly the . . . White House” and several other major monuments. *Id.* The Comprehensive Plan thus cautions against “infrastructure solutions” that would “permanently alter[]” “symbolic views of . . . the White House” and other significant structures. *Id.* at 18. And it instructs that “the preeminence of the . . . White House” and other significant structures should be “[v]isually reinforce[d]” “by protecting the visual frame around them.” *Id.* at 55.

Demolishing the East Wing and erecting the Ballroom is not just a “project” or a “proposed development”—it is also a “revision” of basic principles underpinning the Comprehensive Plan. Such a change in the Comprehensive Plan triggers the statutory requirement for review and opportunity for public input. 40 U.S.C. § 8721.



2. The Defendants may not segment the Ballroom Project to evade NCPC review.

The Defendants claim that NCPC review has not been required because the demolition of the East Wing did not involve “vertical build,” placing it outside the NCPC’s jurisdiction. *See, e.g.*, Craig Decl., Ex. Q at 1. In September 2025, Commissioner Scharf—who, as noted, is also a member of the White House staff working directly for President Trump—stated that, in his opinion, what the Commission “deal[t] with [wa]s essentially construction, vertical build”—not demolition. *Id.* At a press conference held on October 23, 2025, Press Secretary Karoline Leavitt, when asked by another reporter if the President could “tear down anything he wants” at the White House “without oversight,” referenced a “legal opinion” at NCPC to the effect that approval was needed only for vertical construction, not demolition. October 23 Press Conference Video, at 13:58. Similarly, at a dinner for donors on or about October 15, 2025, President Trump said that he had been told by two men that he did not need any approvals or permits and that, as President, he could “do anything [he] want[ed]” to the White House. Craig Decl., Ex. S at 1-2.

The notion that NCPC review is not required for demolition, but only for vertical construction, is just plain wrong.

The NCPC is the zoning authority for federal public buildings in the District of Columbia. *See* 40 U.S.C. § 8722(d). “In order to ensure the orderly development” of the capital district,” “the location, height, bulk, number of stories, and size of federal public buildings,” as well as “the provision for open space in and around federal public buildings” are subject to its approval. *Id.* To that end, the NCPC requires proponents of new construction to submit “construction plans” for its review. *Id.* § 8722(b).

Where, as here, construction of a new building is proposed to take place in the same physical location already occupied by an existing building, “development” and “construction

plans” for the new building necessarily include demolition of the existing building. *Cf. Development*, Am. Heritage Dictionary, <https://www.ahdictionary.com/word/search.html?q=development> (last accessed Dec. 11, 2025) (definitions include “[t]he business of constructing buildings *or otherwise altering land for new use*”) (emphasis added); *Develop*, Merriam-Webster.com, <https://www.merriam-webster.com/dictionary/develop> (last accessed Dec. 11, 2025) (definitions include, “to make available or usable” and “to lead or conduct (something) through a succession of states or changes each of which is preparatory for the next”).

The statute establishing the NCPC supports the commonsense understanding that the NCPC’s review authority necessarily precedes the commencement of vertical construction. Section 8722(b)(1) specifically requires consultation “*before* preparing construction plans,” and even “before making a commitment to acquire land”—which necessarily precedes any demolition on acquired land. 40 U.S.C. § 8722(b)(1). Section 8722(c)(2) requires the NCPC’s input “before acting on any general plan” that would “involve a major change in the character or intensity of an existing use in the environs.” *Id.* § 8722(c)(2). There can be no serious question that demolishing the East Wing involves “a major change in the character” of that structure, regardless of whatever is proposed to be built in its place (though here, that new building itself also represents a decided “change in the character or intensity of an existing use”). *Id.* Section 8722(d) even vests the NCPC with authority to review plans that would involve *no vertical construction at all*, because its statutory purview includes “the provision for open space in and around federal public buildings in the District of Columbia.” *Id.* § 8722(d).

Finally, apart from the NCPC’s general zoning authority, demolition of structures that are featured in the NCPC’s Comprehensive Plan for the capital district—as the White House indisputably is—are subject to the NCPC’s independent review under § 8721. *See id.* § 8721.

Insofar as the Defendants rely on the opinion of Commissioner Scharf (or other legal opinions previously produced by the NCPC) that “construction” for purposes of NCPC review encompasses only vertical build, and not demolition, such opinions are not supported by the plain text or structure of the statutory scheme, and are entitled to no deference. *See Loper Bright*, 603 U.S. at 400-01 (holding that it is the duty of the courts to determine the “single, best meaning” of statutes, in part because, even where ambiguous, “agencies have no special competence in resolving statutory ambiguities”).

The Court should therefore grant a TRO and preliminary injunction enjoining the Defendants from any further work on the site of the Ballroom Project until they have submitted a plan to the NCPC and obtained its approval in accordance with their statutory obligations.

**B. The Defendants’ Failure to Consult with the Commission of Fine Arts Violates the APA.**

Independently from the required NCPC reviews, the Defendants have also flouted their obligations to consult with the CFA. The Defendants have therefore further unlawfully withheld this separate agency action, and by proceeding unabated with the destruction of the East Wing and development of the Ballroom Project, their action is “not in accordance with law” for this reason as well. *See* 5 U.S.C. §§ 706(1), 706(2)(A).

Federal agencies intending to undertake development or construction projects in the capital district are required to seek the advice of the CFA on matters concerning fine arts. 40 U.S.C. § 9102(a). “[F]or public buildings to be erected in the District of Columbia by the federal government and for other structures to be so erected which affect the appearance of the city,” the agency must seek the CFA’s advice “on the plans and on the merits of the design” “*before*” the plans are “final[ly] approv[ed]” or “action” is taken thereon. 45 C.F.R. § 2101.1(a)(1) (emphasis added).

The Ballroom Project is subject to this CFA review because it is a “public building[] to be erected in the District of Columbia.” *Id.* And substantial exterior renovations to the White House—perhaps the most recognizable building in the entire District—undoubtedly “affect the appearance of the city.” *Id.* The Defendants have nevertheless commenced work on the Ballroom Project without submitting a plan to the CFA, or otherwise advising and consulting with the CFA in connection with the project. Had they done so the National Trust and other members of the public could—and would—have provided comments. Merritt Decl. ¶¶ 4-12; Declaration of Alison K. Hoagland (“Hoagland Decl.”), ¶¶ 15-16. Instead, President Trump terminated the entire CFA. The Defendants have therefore shielded the Ballroom Project from transparency in this venue as well. The Court should therefore grant a TRO and preliminary injunction enjoining the Defendants from any further work on the site of the Ballroom Project until they have submitted a plan to the CFA.

**C. Construction of the Ballroom Without Express Authorization of Congress Violates the APA.**

In demolishing the East Wing of the White House and beginning construction of the Ballroom, Defendants have also violated the mandate requiring them to secure prior, express Congressional approval under 40 U.S.C. § 8106. Without that authority, they engaged in agency action “not in accordance with law,” 5 U.S.C. § 706(2). *See McDonnell Douglas Corp. v. United States Dep’t of the Air Force*, 375 F.3d 1182, 1186 n.1 (D.C. Cir. 2004) (concluding that agency action that violated a separate federal statute was contrary to law under the APA); *McDonnell Douglas Corp. v. Widnall*, 57 F.3d 1162, 1164 (D.C. Cir. 1995) (similar). Absent a TRO, The Defendants’ activities will continue, and they will be in violation of the law.

Under 40 U.S.C. § 8106, “[a] building or structure shall not be erected on any reservation, park, or public grounds of the Federal Government in the District of Columbia ***without express authority of Congress.***” *Id.* (emphasis added).

President’s Park comprises the White House and its grounds, and is the planned site of the Ballroom. President’s Park is owned by the Federal Government, managed by the National Park Service, and located in the District of Columbia. *See* Craig Decl. Ex. N, O. It is within the statutory meaning of a “reservation, park, or public grounds.” 40 U.S.C. § 8106.

The Defendants intend to “erect[]” the Ballroom—a “building or structure”—on the grounds of President’s Park. *Id.* That work has already begun: recent reporting has revealed that the site of the East Wing is a “bustling project site” filled with “dozens of workers” and materials pertaining to construction, not demolition. Craig Decl., Ex. B at 3.

Yet Congress has not authorized anyone to build a Ballroom on President’s Park—expressly or otherwise. The Defendants have therefore plainly violated § 8106 and must be enjoined from constructing the Ballroom, or any other similar structure, unless and until they receive express authorization by Congress to do so.

#### **D. The Defendants Have Flouted NEPA’s Procedural Safeguards.**

The Defendants’ failure to complete sufficient environmental reviews with opportunity for public comment violates NEPA and represents a further violation of the APA, demonstrating both unlawfully withheld agency action and agency action not in accordance with law.

NEPA is a fundamentally procedural statute; it requires agencies to follow a certain process, not to make a certain substantive determination. *See Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 350 (1989). Yet it is crucial that agencies follow NEPA’s legally mandated procedures. The Defendants’ failures here are several: (1) Even if an environmental assessment (“EA”) was completed, it could not have been legally sufficient; (2) The Defendants failed to prepare and release an environmental impact statement (“EIS”), which a properly-conducted EA would have required; and (3) To the extent the Defendants bifurcated demolition from vertical

construction for purposes of preparing an EA or EIS, that decision is arbitrary, capricious, and unsupportable.

1. Any EA prepared by the Defendants was inadequate, as a proper EA would have been published and followed by the preparation and publication of an EIS.

Defendants were required to prepare an EA in connection with the Ballroom Project. The project, carried out by multiple federal agencies under the active, personal oversight of the President, is “subject to substantial Federal control and responsibility” and is therefore a “major Federal action.” 42 U.S.C. § 4336e(10)(a). An EA must be prepared for all major federal actions except for those which fall into certain limited exceptions. *See id.* §§ 4332(2)(C), 4336(a). The Ballroom Project falls within no such exception, and the Defendants have never argued otherwise.

An EA is required to be a “concise *public* document,” *id.* § 4336(b)(2) (emphasis supplied). The Defendants have not published an EA in connection with the Ballroom Project. Thus, the Defendants have violated NEPA—either by failing to prepare an EA for the Ballroom Project, *see id.* §§ 4332(2)(C), 4336(b), or by preparing an EA for the project but failing to publish it, *see id.* § 4336(b).

If the Defendants *did* prepare an EA for the Ballroom Project—and there is no evidence that they have—there is no evidence that an EIS was subsequently prepared. As a matter of law, this would mean the Defendants’ EA found that the Ballroom Project had “no significant impact” on the quality of the human environment. *See id.* §§ 4332(2)(C), 4336. But any such finding would be factually unsupported, and thus arbitrary and capricious.

To start, in determining whether a project’s impacts warrant an EIS, NEPA requires the reviewing agency to consider the effects of the proposed federal action on the “human environment,” which includes effects on the “historic [and] cultural” “aspects of our national

heritage.” *Id.* § 4331(b)(4); *id.* § 4332(2)(C). Under the framework long applied by the federal courts, “[w]hether a project has significant environmental impacts, thus triggering the need to produce an EIS, depends on its ‘context’ (region, locality) and ‘intensity’ (‘severity of impact’).” *Nat’l Parks Conservation Ass’n v. Semonite*, 916 F.3d 1075, 1082 (D.C. Cir. 2019) (quoting 40 C.F.R. § 1508.27).<sup>3</sup> There can be no question that the historically incomparable site of the White House qualifies as “significant,” so any inquiry would inevitably turn on the “intensity” element. While the regulations enumerated ten factors to consider, courts recognized that “[i]mplicating any one of the factors may be sufficient to require development of an EIS.” *Id.* Here, the significance of the Ballroom Project’s impact on multiple factors is so obvious that the Court need not dwell on each of the ten. Specifically, significant intensity is apparent from factors: (3) “[u]nique characteristics of the geographic area such as proximity to historic or cultural resources, [or] park lands”; (4) “[t]he degree to which the effects on the quality of the human environment are likely to be highly controversial”; and (8) “[t]he degree to which the action may adversely affect . . . sites, . . . structures, or objects listed in . . . the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.” 40 C.F.R. § 1508.27(b)(3), (4), & (8); *see also* 40 C.F.R. § 1508.1(i)(4) (defining “effects” or “impacts” to include, among others, “aesthetic, historic, cultural, economic, social, or health” effects).

Accordingly, courts have long recognized that NEPA protects distinct cultural and historic interests that must be independently satisfied, even where other statutes with specific historic

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<sup>3</sup> Historically, such assessments utilized the considerations enumerated in NEPA’s implementing regulations promulgated by the Council on Environmental Quality (“CEQ”), including those at 40 C.F.R. § 1508.27, which had been in force in some form since the Carter administration. These regulations were rescinded in April 2025, *see* 90 Fed. Reg. 10610, and are thus no longer binding. Nonetheless, they illustrate the concerns long-held and long-applied by the courts in implementing NEPA’s statutory requirements, and illustrate why the Defendants’ conduct here so plainly violated NEPA.

preservation aims overlap in part. *See Lemon v. McHugh*, 668 F. Supp. 2d 133 (D.D.C. 2009) (holding NEPA’s requirements for review of historic and cultural impacts are not satisfied by separate requirements for the National Historic Preservation Act (“NHPA”)); *Preservation Coalition, Inc. v. Pierce*, 667 F.2d 851 (9th Cir. 1982) (recognizing that NEPA “requires federal agencies to preserve important historic and cultural aspects of our nation’s heritage” and holding that “compliance with the NHPA, even when it exists, does not assure compliance with NEPA. Each [statute] mandates separate and distinct procedures, both of which must be complied with when historic buildings are affected”).<sup>4</sup>

Since the rescission of the prior NEPA regulations, the defendant Department of the Interior has developed guidance for implementing NEPA through a “DOI NEPA Handbook.” Dep’t of Interior, *New Department of the Interior NEPA Procedures*, <https://www.doi.gov/oepe/national-environmental-policy-act-nepa> (last accessed Dec. 11, 2025); Dep’t of Interior, *DOI Handbook of NEPA Procedures*, available at <http://doi.gov/media/document/doi-nepa-handbook> (last accessed Dec. 11, 2025). That handbook includes certain similar considerations for the level of NEPA review as in the prior NEPA regulations, including “the proposed scope of the affected area (national, regional, or local) . . . and the affected area’s natural and cultural resources” and “[e]ffects on the quality of life of the American people.” *DOI Handbook of NEPA Procedures*, § 1.2(b)(1) & (2); *see also DOI Handbook of NEPA Procedures*, Appendix 3, § 6(5) (June 2025),

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<sup>4</sup> Because “the ‘affected human environment reviewed under NEPA includes aesthetic, historic, and cultural resources,’” “agencies must still fulfill the requirements under” NEPA in conjunction with other “independent statutes” governing preservation, including NHPA. *NEPA and NHPA – A Handbook for Integrating NEPA and Section 106*, Council On Environmental Quality 12-13 (2013), available at [https://ceq.doe.gov/docs/ceq-publications/NEPA\\_NHPA\\_Section\\_106\\_Handbook\\_Mar2013.pdf](https://ceq.doe.gov/docs/ceq-publications/NEPA_NHPA_Section_106_Handbook_Mar2013.pdf) (last accessed Dec. 11, 2025) (further clarifying that “[c]ultural resources that are not eligible for or listed in the National Register may be considered as part of the NEPA review”).



<https://www.doi.gov/media/document/doi-nepa-appendix-3> (further illustrating the “quality of life of the American people” factor to include, among other things, “[e]ducation and knowledge, which may include evaluation of learning, interpretation, and research opportunities related to cultural, historic, and natural resources”). This guidance applies to actions of both the defendant Department of Interior and the defendant National Park Service.

Of course, apart from the significant adverse cultural, aesthetic, and historic impacts on the human environment of Lafayette Square, President’s Park, and the White House, the demolition of the East Wing raises further physical environmental and public health concerns. *See* 40 C.F.R. § 1508.27(b)(2) (considering among 10 “intensity” factors, “[t]he degree to which the proposed action affects public health or safety”); *DOI Handbook of NEPA Procedures*, § 1.2(b)(2)(iii) (DOI’s consideration of effects must include “[e]ffects on public health and safety”). When the East Wing was demolished, it was over 120 years old, and many buildings of similar age contain recognized health-impacting environmental hazards—such as asbestos and lead paint—that must be properly handled. Yet debris from the East Wing demolition has been dumped in at least one public park, and perhaps elsewhere, with no apparent treatment or regard for its potential hazards.

Under all of these circumstances, a finding of no significant impact cannot be supported. Without conducting the requisite, sufficient environmental analysis, the Defendants could not (and did not) “consider every significant aspect of the environmental impact of a proposed action,” *Vt. Yankee Nuclear Power Corp. v. Nat. Res. Def. Council, Inc.*, 435 U.S. 519, 553 (1978), or “take a ‘hard look’ at environmental consequences,” *Robertson*, 490 U.S. at 350 (citation omitted). NEPA expressly requires that for any major Federal action, the EIS provide a “detailed statement” of both “a reasonable range of alternatives to the proposed agency action” and “any irreversible and

irretrievable commitments of Federal resources which would be involved in the proposed agency action should it be implemented.” 42 U.S.C. § 4332(2)(C)(iii) & (v).

And without publishing any such analysis, the Defendants have robbed the public of any opportunity to comment on these activities. Public participation is a core pillar of NEPA, and the public cannot be excluded where activities will have a significant effect. *See Vt. Yankee*, 435 U.S. at 553; *Marsh v. Ore. Nat. Res. Council*, 490 U.S. 360, 371 (1989). Given that NEPA is at its core a procedural statute, it is crucial that those procedures—including sufficient environmental analysis and public participation—take place *before* the Defendants implement any actions. Otherwise, the Defendants may “act on incomplete information, only to regret [their] decision after it is too late to correct.” *Marsh*, 490 U.S. at 371.

Until the Defendants prepare and publish sufficient environmental analyses, they cannot proceed with the Ballroom Project. Their failure to complete a sufficient EA or EIS is an agency action unlawfully withheld, and their proceeding with the demolition of the East Wing and development of the Ballroom Project is action contrary to law. 5 U.S.C. §§ 706(1), 706(2)(A). This Court should thus compel the Defendants to undertake the first step of NEPA’s procedural requirements. To the extent that the Defendants have conducted any analysis, “without observance of procedure required by law,” their conduct is arbitrary and capricious. *Id.* § 706(2)(A), (C).

2. If the Defendants considered only the demolition of the East Wing or only the construction of the Ballroom in preparing an EA, they improperly segmented NEPA review.

Finally, to the extent the Defendants found that the Ballroom Project had no significant impact on the human environment because they artificially divided the EA process by either (1) assessing the demolition of the East Wing *alone*, without regard for the disposal of debris from the East Wing, the impacts of the construction of the Ballroom, or both; or (2) assessing the impacts

of the construction of the Ballroom without consideration of the impacts of the demolition of the East Wing or the disposal of its debris, such decisions constituted impermissible “segmentation.” Such actions are arbitrary, capricious, and contrary to law. *See DOI Handbook of NEPA Procedures*, Appendix 3, § 5 (NEPA review must consider “reasonably foreseeable effects” resulting from the “project at hand” and may segregate review only of “other projects” that are “separate in time or place from the project at hand”); *see also* 40 C.F.R. § 1508.27(b)(7) (NEPA’s intensity “[s]ignificance cannot be avoided by terming an action temporary or by breaking it down into small component parts”).

An agency cannot “segment[]” its NEPA review by dividing “connected, cumulative, or similar federal actions into separate projects.” *Del. Riverkeeper Network v. FERC*, 753 F.3d 1304, 1313 (D.C. Cir. 2014) (separate NEPA reviews are inappropriate where agency was “undeniably aware that the previous and following projects were also under construction or review, and that each phase of the development fit with the others like puzzle pieces to complete an entirely new [project]”). “The justification for the rule against segmentation is obvious: it ‘prevent[s] agencies from dividing one project into multiple individual actions each of which individually has an insignificant environmental impact, but which collectively have a substantial impact.’” *Id.* (quoting *NRDC v. Hodel*, 865 F.2d 288, 297 (D.C. Cir. 1988)) (alteration in original). The rule also prevents agencies from evading NEPA review with respect to one or more portions of a larger and ostensibly separate project for which the agency has prepared, or will prepare, an EIS.

The Ballroom Project is a single project for the purposes of NEPA review: It involves the demolition of a significant portion of an existing building, the disposal of debris from that demolition, and the construction of a new structure in the same physical location. *See Stewart Park & Reserve Coalition, Inc. v. Slater*, 352 F.3d 545, 559 (2d Cir. 2003) (“A project has been

improperly segmented, on the other hand, if the segmented project has no independent utility, no life of its own, or is simply illogical when viewed in isolation.”) (citing *Hudson River Sloop Clearwater, Inc. v. Dep’t of Navy*, 836 F.2d 760, 763-64 (2d Cir. 1988)); *Vieux Carre Property Owners, Residents & Assocs., Inc. v. Pierce* 719 F.2d 1272 (5th Cir. 1983) (“Regardless of funding sources, integrally related activities designed to accomplish, in whole or in part, a specific goal are to be grouped together for consideration as a single project. Moreover, closely related and proposed or reasonably foreseeable actions that are related by timing or geography also must be considered together.”).

Finally, while any decision by the Defendants to conduct a NEPA review of only the East Wing demolition would violate their statutory obligations, such a decision would also necessarily fail regardless of the basis: The demolition of the East Wing occurred *before* any public EA was released. As such, the Defendants can point to no reasoned explanation for any such decision. *See Motor Vehicle Mfrs. Ass’n, Inc. v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 48 (1983) (“[A]n agency must cogently explain why it has exercised its discretion in a given manner.”); *Encino Motorcars, LLC v. Navarro*, 579 U.S. 211, 221 (2016) (“One of the basic procedural requirements of administrative rulemaking is that an agency must give adequate reasons for its decisions. . . . [W]here the agency has failed to provide even [a] minimal level of analysis, its action is arbitrary and capricious and so cannot carry the force of law.”).

The Court should therefore enter a TRO and preliminary injunction enjoining the Defendants from any further work until they complete and publish an appropriate EA and EIS for the Ballroom Project.

**E. The President’s Unilateral Action Violates the Constitution.**

The Constitution both prescribes and proscribes the respective powers of the President and Congress. As between those two branches, the Property Clause of the U.S. Constitution definitively vests exclusive authority over federal property with Congress. U.S. Const. Art. IV, § 3, Cl. 2 (“The Congress shall have Power to dispose of and make all needful Rules and Regulations respecting the Territory or other Property belonging to the United States.”). The Supreme Court has “repeatedly observed that ‘[the] power over the public land thus entrusted to Congress is without limitations.’” *Kleppe v. New Mexico*, 426 U.S. 529, 539 (1976) (quoting *United States v. San Francisco*, 310 U.S. 16, 29 (1940) and collecting cases). That power is exclusive: Nothing in the Constitution gives the President overlapping authority to dispose of federal property. As a result, only *Congress* may authorize the construction of federal buildings; the President, acting unilaterally, is wholly without constitutional authority to build or demolish anything on federal grounds.

President Trump’s actions in directing and coordinating the Ballroom Project are therefore without authority, constitutional or otherwise. In usurping the role ascribed to Congress via the Property Clause, he has violated the separation of powers.

The Supreme Court has continued to recognize the availability of “implied equitable actions ‘directly under the Constitution.’” *LULAC v. Exec. Off. of the President*, No. 25-0946, 2025 U.S. Dist. LEXIS 215411, at \*76 (Oct. 31, 2025); *see also Free Enter. Fund v. Pub. Co. Acct. Oversight Bd.*, 561 U.S. 477, 491 n.2 (2010). The National Trust is likely to succeed on such a claim, and it therefore invokes this Court’s equitable authority to prevent the President’s further derogation of constitutional roles. *See LULAC*, 2025 U.S. Dist. LEXIS 215411, at \*82; *see also Collins v. Yellen*, 594 U.S. 220, 245 (2021) (“[W]henver a separation-of-powers violation

occurs, any aggrieved party with standing may file a constitutional challenge.”); *cf. Freytag v. C.I.R.*, 501 U.S. 868, 880 (1991) (“The structural interests protected by” the separation of powers “are not those of any one branch of Government but of the entire Republic.”).

The seminal separation-of-powers case, *Youngstown Sheet & Tube Co. v. Sawyer*, counsels that where a President acts “incompatibl[y] with the expressed or implied will of Congress, his power is at its lowest ebb.” 343 U.S. at 637 (Jackson, J., concurring). On the relative attribution of power here, the Court has spoken clearly: “Congress exercises the powers both of a proprietor and of a legislature over the public domain,” such that the Property Clause “permit[s] ‘an exercise of *the complete power* which Congress has over particular public property entrusted to it.’” *Kleppe*, 426 U.S. at 540 (emphasis added). To act at this nadir of Executive power, the President must demonstrate that he has the inherent constitutional authority to unilaterally demolish the East Wing and to build a ballroom that will cast the remainder of the White House in its shade. He cannot do so.

The Supreme Court’s clarification of the scope of separation-of-powers claims against the President in *Dalton v. Specter*, 511 U.S. 462 (1994) does not disturb the National Trust’s claim. The *Dalton* analysis begins with determining whether the claim at issue is properly characterized as statutory or constitutional. *LULAC*, 2025 U.S. Dist. LEXIS 215411, at \*77. In *Dalton*, the Supreme Court drew this distinction when reviewing the President’s decision to close military bases without observing certain statutory procedural requirements. There, the Court observed that the procedural requirements whose violation the plaintiffs complained of arose *solely* from a statute, and one which explicitly granted the President the authority to close military bases within his discretion, with the result that judicial review was “not available.” *See Dalton*, 511 U.S. at 469-472. By contrast, in *Youngstown*, President Truman asserted that his action in seizing steel mills

“should be implied from the aggregate of his powers under the Constitution,” including the duties that he “shall take Care that the Laws be faithfully executed” and that he “shall be Commander in Chief.” 343 U.S. 579, 586-87 (1952).

President Trump’s actions here in coordinating and directing every aspect of the Ballroom Project fall decisively outside the realm of statutory claims. Indeed, the President can point to no statute that provides him with authority—discretionary or otherwise—to demolish the East Wing or construct a ballroom in its place. Any justification for this action must therefore rest on some unarticulated theory of inherent or implied executive authority—taking this action well outside of the relatively narrow circumstances foreclosing judicial review in *Dalton* and placing it comfortably within the ambit of *Youngstown* and its progeny.

President Trump’s statements demonstrate that he believes—wrongly—that he has an independent, constitutional power to “do anything [he] want[s]” to the White House. Acting on that belief, he has reportedly personally met with and directed contractors, personally engaged (and replaced) architects, and personally revised plans. “The executive action we have here originates in the individual will of the President and represents an exercise of authority without law. . . . With all its defects, delays and inconveniences, men have discovered no technique for long preserving free government except that the Executive be under the law.” *Youngstown*, 343 U.S. at 655 (Jackson, J., concurring). President Trump’s actions intrude on Congress’s exclusive prerogatives over federal property and violate the separation of powers.

Due to the extraordinary and extralegal involvement of the President here, the National Trust requests that the Court include President Trump within the ambit of its TRO and injunction. The National Trust recognizes that courts generally “may not enjoin the President regarding the performance of his official acts.” *Dellinger v. Bessent*, 2025 U.S. App. LEXIS 3987, \*43 (D.C.

Cir. Feb. 15, 2025) (citing *Franklin*, 505 U.S. at 802-03 (Scalia, J., concurring in part)). But President Trump performs no “official act” in personally planning and unilaterally directing changes to federal buildings of immense national significance. *Cf. Trump v. United States*, 603 U.S. 593, 615 (2024) (“As for a President’s *unofficial* acts, there is no immunity.”) (emphasis added). The Supreme Court has recently clarified that, even though drawing the line between official and unofficial acts may be difficult in some cases, the inquiry must always begin with whether “the President acts pursuant to ‘constitutional and statutory authority.’” *Id.* at 617. And here, although the President purports to act under some inherent presidential authority, he has no constitutional basis to carry out the Ballroom Project. He therefore may be enjoined from further unofficial acts in engaging contractors or architects, or issuing direct work orders to those personnel, pending authority from Congress.<sup>5</sup>

## **II. The National Trust Will Be Irreparably Harmed Absent a TRO.**

No injunction can bring back the East Wing of the White House. Over a century of national significance has already been lost. And most critically, the American people had no opportunity to review or participate in the wholesale reformation of the People’s House. Nonetheless, this Court can and should enjoin the Defendants from taking further actions that will—in the absence of orderly review and comment—irrevocably transform one of our nation’s most cherished structures.

To obtain a TRO and preliminary injunction, the National Trust must show it is likely to suffer irreparable harm in the absence of relief. The injury must be “both certain and great; it must be actual and not theoretical,” and “of such imminence that there is a clear and present need for equitable relief,” and it must not be adequately compensable in money damages. *Wis. Gas Co. v.*

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<sup>5</sup> Needless to say, those acting at the direction of the President also may be enjoined from executing on his orders to manifest the separation-of-powers violation.



*Fed. Energy Regul. Comm’n*, 758 F.2d 669, 674 (D.C. Cir. 1985) (per curiam); *Amoco Prod. Co. v. Vill. of Gambell*, 480 U.S. 531, 545 (1987); *Winter*, 555 U.S. at 22-23.

The National Capital Planning Act, the CFA’s enabling statute, and NEPA all provide procedural rights designed to protect the nation’s historic and aesthetic heritage—interests of such unique importance that no money damages would ever be adequate to compensate for their loss or destruction. Where an irreversible action is imminent, the denial of those procedures can itself be an irreparable injury. *See Summers v. Earth Island Inst.*, 555 U.S. 488, 496 (2009); *Ctr. for Biological Diversity v. U.S. Dep’t of Interior*, 563 F.3d 466, 479 (D.C. Cir. 2009). Section 8106, through its sharp and specific focus on federal parkland within the seat of the nation’s capital, protects similar historical and cultural interests. The Defendants are carrying out the Ballroom Project with no proper NEPA review, no NCPC approval or consultation, no CFA review, and no congressional authority—depriving the National Trust of statutory and regulatory rights to information, comment, and participation before critical decisions are made.

The National Trust’s harms, and the harms to the public interest here, are significant and concrete. Had the Defendants adhered to these well-established procedural requirements, the National Trust would have participated in each of the NCPC, CFA, and NEPA processes. Merritt Decl. ¶¶ 4-12. Such review and participation is at the heart of the National Trust’s mission: “[W]e help preserve the places and stories that make communities unique. Through the stewardship and revitalization of historic sites, we help communities foster economic growth, create healthier environments, and build a stronger, shared sense of civic duty and belonging.” National Trust for Historic Preservation, Press Center, <https://savingplaces.org/press-center> (last accessed Dec. 11, 2025). The National Trust’s participation vindicates the interests of its members, including architectural historian Professor Alison K. Hoagland, who have been deprived of the use and

enjoyment of the East Wing in both their personal and professional capacities; have suffered aesthetic, cultural, and historic harms from the Defendants’ demolition of the East Wing; and will continue to suffer further mounting harms from the construction of the Ballroom in the manner proposed. *See* Hoagland Decl. ¶¶ 9-16.

These harms are no mere abstractions. As Professor Hoagland explains, “The White House was designed to be a symbol of the new nation,” and, with its intentionally modest stature for a building of its significance, “the White House in its current form embodies some of the ideals on which the nation was founded.” Hoagland Decl. ¶ 10. But should the palatial Ballroom be built as proposed, the historical significance of this design will be physically overcome: “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*.” Hoagland Decl. ¶ 13.

As courts routinely recognize, these aesthetic, cultural, and historical harms are compounded by the procedural harms inflicted by the Defendants’ violations. Without access to the statutorily mandated reviews and reports, the National Trust has been “deprived of key information that it relies on” in its stewardship mission, and it has been “precluded from” preserving a historic site “through [the National Trust’s] normal process” of participating in public fora for commentary on development and construction regarding historic sites in the United States, including those of the CFA, NCPC, and NEPA. *People for the Ethical Treatment of Animals v. USDA*, 797 F.3d 1087, 1093-95 (D.C. Cir. 2015) (recognizing organizational injury for denial of “access to information and avenues of redress they wish to use in their routine” activities which thereby “inhibit[s] . . . daily operations”) (quoting *Action All. of Senior Citizens of Greater Philadelphia v. Heckler*, 789 F.2d 931, 937-38 (D.C. Cir. 1986)); *see* Merritt Decl. ¶¶ 4-8 (recounting the National Trust’s decades of influential participation in such processes).

These interests are simultaneously the core of what Congress sought to protect with the procedural requirements of each of the NCPC, CFA, and NEPA. *See, e.g.*, 40 U.S.C. § 8711(a) (“The National Capital Planning Commission is . . . created to preserve the important historical and natural features of the National Capital.”); 45 C.F.R. § 2101.1(a)(1) (providing for CFA review of building plans that “affect the appearance of the city”); 42 U.S.C. § 4331(b)(4) (declaring that “preserv[ing] important historic, cultural, and natural aspects of our national heritage” constitutes an important goal of NEPA).

These harms are irreparable. The Supreme Court has emphasized that environmental injury “can seldom be adequately remedied by money damages” and “is often permanent or at least of long duration.” *Amoco*, 480 U.S. at 545. Building on that principle, courts routinely recognize that NEPA’s duties are “more than a technicality” and that the lack of adequate environmental consideration itself “looms as a serious, immediate, and irreparable injury.” *Brady Campaign to Prevent Gun Violence v. Salazar*, 612 F. Supp. 2d 1, 24 (D.D.C. 2009) (quoting *Found. on Econ. Trends v. Heckler*, 756 F.2d 143, 157 (D.C. Cir. 1985)); *see also Oglala Sioux Tribe v. U.S. Nuclear Regul. Comm’n*, 896 F.3d 520, 534, 536 (D.C. Cir. 2018) (rejecting argument that failing to conduct NEPA review was harmless or “merely a ‘procedural deficienc[y],’” because “such an approach would vitiate” the statute). And, “[w]hen a procedural violation of NEPA is combined with a showing of environmental or aesthetic injury, courts have not hesitated to find a likelihood of irreparable injury.” 612 F. Supp. 2d at 24–25 (citing *Fund for Animals v. Norton*, 281 F. Supp. 2d 209, 221 (D.D.C. 2003)). Collectively, the procedural injury combined with the aesthetic and environmental injuries plainly demonstrate a “clear and present need for equitable relief.” *Wis. Gas*, 758 F.2d at 674.

### **III. The Balance of Hardships and the Public Interest Weigh Overwhelmingly in Favor of the National Trust.**

Where the government is the defendant, the balance-of-equities and public-interest factors “merge.” *See All. for Retired Ams. v. Bessent*, No. 25-0313, 2025 U.S. Dist. LEXIS 42019, at \*36 (D.D.C. Mar. 7, 2025); *Nken v. Holder*, 556 U.S. 418, 435 (2009). In weighing the balance of equities, the Court “must balance the competing claims of injury and must consider the effect on each party of the granting or withholding of the requested relief.” *Winter*, 555 U.S. at 24 (quotation omitted); *Weinberger v. Romero-Barcelo*, 456 U.S. 305, 312 (1982).

These statutory schemes vindicate their cultural, aesthetic, historic, and environmental interests through a transparency mandate that provides the public with the opportunity to assess agency decision making. *See Nat’l Parks Conservation Ass’n v. Semonite*, 916 F.3d 1075, 1082 (D.C. Cir. 2019) (“NEPA’s primary function is ‘information-forcing,’ compelling federal agencies to take a hard and honest look at the environmental consequences of their decisions.”) (quoting *American Rivers & Ala. Rivers Alliance v. FERC*, 895 F.3d 32, 49 (D.C. Cir. 2018)); *id.* (“[S]uch effects can be, among others, historic, aesthetic, or cultural.”). Accordingly, the public has a strong interest in the government’s “meticulous compliance” with the law. *See Fund for Animals, Inc. v. Espy*, 814 F. Supp. 142, 152 (D.D.C. 1993); *Fund for Animals v. Clark*, 27 F. Supp. 2d 8, 15 (D.D.C. 1998) (“[T]he public interest expressed by Congress was frustrated by the federal defendants not complying with NEPA.”). Freezing the status quo to conduct these statutorily mandated reviews therefore upholds the public interest. *See Oglala Sioux Tribe*, 896 F.3d at 536.

Moreover, all an injunction would require the Defendants to do is follow the statutorily required processes with which they should have complied in the first place. Where, as here, a plaintiff faces permanent injury and the defendants can show at most slight delay due to a statutory obligation to comply with the law as written, these factors favor the plaintiff. The D.C. Circuit

rejects the notion that mere delay to complete required procedures harms the public, emphasizing that agencies have no rightful interest in acting contrary to federal statutes. *See generally, Marin Audubon Soc’y v. FAA*, 121 F.4th 902 (D.C. Cir. 2024); *see also League of Women Voters v. Newby*, 838 F.3d 1, 12 (D.C. Cir. 2016). The government has no cognizable interest in avoiding compliance with the laws Congress has enacted: “There is generally no public interest in the perpetuation of unlawful agency action.” *League of Women Voters*, 838 F.3d at 12. The Defendants’ actions are therefore contrary to what “Congress, in enacting [the National Capital Planning Act], declared to be in the public interest.” *Id.* at 13. And on the other side of the ledger, there is a substantial public interest ‘in having governmental agencies abide by the federal laws that govern their existence and operations.’” *Id.* at 12 (citing *Washington v. Reno*, 35 F.3d 1093, 1103 (6th Cir. 1994)).

A TRO that maintains the status quo will therefore cause no cognizable injury to the Defendants. While much damage has already been inflicted on the public through the demolition of the East Wing, the injunctive relief sought will merely ensure that this harm cannot be compounded by the construction of a Ballroom incompatible with its historic surroundings while this case proceeds. *See Wash. Metro. Area Transit Comm’n v. Holiday Tours, Inc.*, 559 F.2d 841, 844 (D.C. Cir. 1977) (preliminary relief is appropriate to “maintain the status quo pending a final determination of the merits”). Courts routinely hold that preserving the status quo pending the outcome of litigation is in the public interest, including where there may be irreparable environmental or cultural harm absent this preliminary relief. *See, e.g., Brady Campaign to Prevent Gun Violence*, 612 F. Supp. 2d at 24–25.

To the extent the Defendants claim they will suffer harm because they have already begun planning, soliciting bids, or tentatively scheduling work on the Ballroom, any such harm is “self-

inflicted” and carries little equitable weight. *See, e.g., League of Women Voters*, 838 F.3d at 12-13 (government cannot invoke harm flowing from its own unlawful actions to defeat injunctive relief). Moreover, any such harm would itself provide evidence in support of the procedural violations that merit injunctive relief, because it would indicate that the Defendants have prepared construction plans without any review or input from the NCPC or CFA. The Defendants chose to move forward with a major project on one of the nation’s most significant sites without first undertaking the procedures Congress mandates. They cannot now rely on the costs of that premature decision to outweigh the National Trust’s concrete and irreparable harms.

**IV. Any Security Bond Requirement Should Be Waived Due To the National Trust’s Nonprofit Status and Pursuit of Litigation in the Public Interest.**

In connection with the National Trust’s request for injunctive relief in this case, the National Trust requests that the Court waive any security bond requirement.

Federal Rule of Civil Procedure 65(c) provides that “[t]he court may issue a preliminary injunction or a temporary restraining order only if the movant gives security in an amount that the court considers proper to pay the costs and damages sustained by any party found to have been wrongfully enjoined or restrained.” However, “[t]he language ‘in such sum as the court deems proper’ has been read to vest broad discretion in the district court to determine the appropriate amount of an injunction bond.” *DSE, Inc. v. United States*, 169 F.3d 21, 33 (D.C. Cir. 1999) (affirming order waiving bond due to the “public service” rendered by the plaintiff’s suit). This “include[es] the discretion to require no bond at all.” *P.J.E.S. v. Wolf*, 502 F. Supp. 3d 492, 520 (D.D.C. 2020).

Because of the National Trust’s nonprofit status and limited funds, it has a strong policy against paying attorneys’ fees, other than out-of-pocket expenses, when it participates in advocacy litigation. Merritt Decl. ¶ 14. Instead, it relies on *pro bono* representation when outside counsel is

needed, as in this case, or public interest lawyers whose discounted fees can be covered by other organizations. *Id.*

When the National Trust seeks injunctive relief in a case, the Trust has always requested, and virtually always received, a waiver of the security bond requirement based on the “public interest” nature of the litigation. *Id.* ¶ 15. The National Trust’s litigation program is aimed at enforcing and vindicating the rights of the public as a whole, which are reflected in federal and state laws protecting historic properties. This policy is in furtherance of the National Trust’s congressional charter, directing the Trust to “facilitate public participation” in historic preservation. 54 U.S.C. § 312102(a); Merritt Decl. ¶ 15.

“A bond ‘is not necessary where requiring [one] would have the effect of denying the plaintiffs their right to judicial review of administrative action.’” *Nat’l Council of Nonprofits v. OMB*, 775 F. Supp. 3d 100, 130 (D.D.C. 2025) (quoting *Nat. Res. Def. Council, Inc. v. Morton*, 337 F. Supp. 167, 168 (D.D.C. 1971)). Such a situation arises where a bond would “hold Plaintiffs hostage” for the harm from the government’s own unlawful conduct. *Id.* (noting that defendants “will personally face no monetary injury from the injunction”).

The imposition of a security bond—as a condition for obtaining injunctive relief to temporarily delay construction or demolition activities that would harm historic resources—would have a direct chilling effect on the ability of the National Trust, and other public interest plaintiffs, to advance the public interest and enforce compliance with historic preservation laws through litigation. Merritt Decl. ¶ 16. If the financial burden of vindicating public rights were to fall on nonprofit organizations that bring enforcement actions, such as the National Trust, then the procedural rights and historic and cultural interests that Congress sought to protect through its

statutes—including NEPA and those creating the NCPC and CFA—would effectively be vitiated. *Id.*

The National Trust could not post a substantial injunction bond without diverting funds from other purposes and therefore reducing its historic preservation programs. Merritt Decl. ¶ 18. Alternatively, the National Trust would simply not be able to post such a bond at all, and would be unable to secure the injunction on which it was conditioned. *Id.* ¶ 19.

### **CONCLUSION**

The National Trust respectfully requests that this Court grant its Motion for Temporary Restraining Order and Preliminary Injunction, and enter an order enjoining the Defendants and those working in concert therewith or under their direction and control from taking any and all actions in furtherance of the physical development of the Ballroom Project, including but not limited to any further demolition, site preparation work, subsurface work, removal of debris, removal of soil, landscape alteration, vegetation or tree removal, grading, excavation, digging, trenching, boring, filling, blasting, laying of foundations, laying of utilities, pile driving, construction equipment installation, or other construction or related work at the White House or within President’s Park. The National Trust requests that the Order and Injunction specify that no such work shall proceed until the requisite reviews have taken place in accordance with the Administrative Procedure Act, 5 U.S.C. § 701 *et seq.*; until the Ballroom Project has been reviewed and approved of by the National Capital Planning Commission, and reviewed by the Commission of Fine Arts, *see* 40 U.S.C. §§ 8721(e), (h), 8722(b), 8722(d), 9102; *see also* 45 C.F.R. § 2101.1(a)(1); until adequate environmental assessments and environmental impact statements have been prepared under the National Environmental Policy Act, 42 U.S.C. § 4331 *et seq.*; and until Congress has expressly authorized the construction of the Ballroom, *see* 40 U.S.C. § 8106.



Respectfully submitted,

Dated: December 12, 2025

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**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 ELIZABETH S. MERRITT**

1. My name is Elizabeth S. Merritt, and I am Deputy General Counsel at the National Trust for Historic Preservation in the United States (“National Trust”). I have served in the National Trust’s Law Department for more than 41 years, focused on advocacy to protect historic places throughout the nation, in both the administrative and judicial arenas. As a result, I am very familiar with the National Trust’s programs, and especially its advocacy and litigation activities. 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.

2. The National Trust is a private charitable, educational, nonprofit corporation chartered by Congress in 1949 to further the historic preservation policies of the United States, and to facilitate public participation in the preservation of historic properties. See 54 U.S.C. § 312102(a).

3. As part of the National Trust’s public interest advocacy program, the National Trust has often participated in litigation to enforce federal, state, and local laws that protect historic places. Since 1970, the National Trust has formally participated in hundreds of cases in

state and federal courts around the country, both as a plaintiff and as *amicus curiae*, and occasionally as an intervening defendant.

4. The National Trust has a long history of active involvement in the federal project and planning review processes conducted by the National Capital Planning Commission (“NCPC”). For example, the National Trust has previously submitted testimony or comments to the NCPC over the course of many years regarding the following matters:

- Opposing demolition of historic officers’ housing at Fort McNair (Feb. 2, 2023);
- Adverse impacts of McMillan Park development on President Lincoln’s Cottage (Nov. 7, 2014);
- Comments regarding the Height Act (Oct. 25 and Nov. 19, 2013);
- Master Plan for Homeland Security Department headquarters at St. Elizabeths Hospital campus (Nov. 1, 2007 and Jan. 8, 2009);
- Proposed Vietnam Veterans Memorial Visitor Center (Dec. 6, 2007);
- Courtyard roof for Old Patent Office Building (June 2, 2005); and
- Closing of Pennsylvania Avenue in front of the White House (Mar. 12, 2003).

5. In addition, I personally have submitted written or in-person testimony to NCPC on behalf of the National Trust regarding the following matters:

- Redevelopment of the McMillan Park site (Nov. 6, 2014);
- Proposed Vietnam Veterans Memorial Visitor Center (Aug. 3, 2006 and June 3, 2009);
- Courtyard roof for Old Patent Office Building (Sept. 8, 2005); and
- Washington Monument security and visitor facilities (May 1, 2003).

6. The National Trust is also routinely and actively involved in review of environmental assessments (“EA”) and environmental impact statements (“EIS”) prepared by federal agencies pursuant to the National Environmental Policy Act (“NEPA”).

7. The National Trust frequently submits comments on NEPA documents, and is often involved in enforcing federal agency compliance with NEPA. *See, e.g., National Parks*

*Conservation Ass'n, et al. v. Semonite*, No. 18-5179 (D.C. Cir. Mar. 1, 2019); *Coalition Against a Raised Expressway (CARE), et al. v. Dole*, 835 F.2d 803 (11th Cir. 1988); *Druid Hills Civic Ass'n, et al. v. Federal Highway Admin.*, 772 F.2d 700 (11th Cir. 1985); *Citizen Advocates for Responsible Expansion, Inc. (I-CARE), et al. v. Dole*, 770 F.2d 423 (5th Cir. 1985); *City of South Pasadena, et al. v. Slater*, 56 F. Supp. 2d 1106 (C.D. Cal. 1999).

8. In my decades of personal experience at the National Trust, the National Trust's commentary and advocacy before the NCPC and other governmental entities (whether federal, state, or local) has been highly influential. The National Trust's advocacy often results in modifications to proposed projects.

9. The National Trust follows developments in preserving and interpreting the White House through, among other things, the White House Historical Association, and a representative of the National Trust serves as an ex officio member of the board of the Association. The White House Historical Association is also co-steward, with the National Trust, of Decatur House. Decatur House, located adjacent to President's Park in Lafayette Square and owned by the National Trust since 1956, is itself a historic building and the first private residence built in the White House neighborhood. When the National Trust conducts board meetings in Washington, D.C., they are frequently held at Decatur House.

10. On October 21, 2025, in response to the initiation of demolition of the White House East Wing, the National Trust's President and CEO, Carol Quillen, sent a letter to the Chair of the NCPC, the Acting Director of the National Park Service, and the Chair of the CFA. The letter expressed serious concerns about the failure to comply with the public review process for the Ballroom Project, and urged the Administration and the National Park Service to cease

demolition until after the required review procedures for the Ballroom Project had been completed.

11. Because of the National Trust's concern regarding the failure to initiate review by the NCPC, I personally reached out to Meghan Hottel-Cox, General Counsel and Secretary at the NCPC, to inquire as to whether the NCPC had received any submissions regarding the White House Ballroom Project. And on December 3, 2025, I specifically mentioned my concern by email that construction of the Ballroom has already been initiated. Ms. Hottel-Cox responded by email on December 5, 2025 that "NCPC has not yet received a submission for the Ballroom project."

12. Assuming that the Defendants do submit plans for the Ballroom Project to the NCPC and CFA, the National Trust intends to participate actively in the public comment process. In addition, the National Trust intends to submit comments in response to any NEPA document that is released to the public regarding the Ballroom Project. Among other things, the National Trust intends to express a concern that the massing and height of the proposed new construction will overwhelm the White House itself and may also permanently disrupt the carefully balanced classical design of the White House with its two smaller, and lower, East and West Wings, and to urge the NCPC and CFA to take these concerns into consideration. The ongoing demolition and construction activities severely harm the interests of the National Trust by foreclosing alternatives and modifications to the Ballroom Project that could avoid, minimize, and/or mitigate the adverse effects of the Project on the historic significance of the White House.

13. In connection with the National Trust's request for injunctive relief in this case, the National Trust requests a waiver of any security bond requirement.

14. Because of the National Trust's nonprofit status and limited funds, we have a policy against paying attorneys' fees, other than out-of-pocket expenses, when we participate in advocacy litigation. Instead, we rely on *pro bono* representation when outside counsel is needed, as in this case, or public interest lawyers whose discounted fees can be covered by other organizations.

15. When the National Trust seeks injunctive relief in a case, the Trust has always requested (and virtually always received) a waiver of the security bond requirement based on the "public interest" nature of our litigation. The National Trust's litigation program is aimed at enforcing and vindicating the rights of the public as a whole, which are reflected in federal, state, and local laws protecting historic properties. This policy is in furtherance of the National Trust's congressional charter, directing the Trust to "facilitate public participation" in historic preservation. 54 U.S.C. § 312102(a).

16. The doctrine allowing a waiver of the security bond is based on the recognition that organizations such as the National Trust, acting as private attorneys general, have no personal or financial stake in the enforcement litigation and therefore prosecute lawsuits that benefit the public as a whole.

17. The imposition of a security bond—as a condition for obtaining injunctive relief to temporarily delay construction or demolition activities that would harm historic resources—would have a direct chilling effect on the ability of the National Trust, and other public interest plaintiffs, to advance the public interest and enforce compliance with historic preservation laws through litigation. If the financial burden of vindicating public rights were to fall on nonprofit organizations that bring enforcement actions, such as the National Trust, then the incentives intentionally created by Congress to encourage citizen suits and private attorney general actions,


(*see, e.g.*, 54 U.S.C. § 307105 (NHPA); 28 U.S.C. § 2412 (EAJA)), would be significantly reduced or eliminated.

18. The National Trust could not post a substantial injunction bond without diverting funds intended for other historic preservation programs.

19. Alternatively, the National Trust would simply not be able to post such a bond at all, and would be unable to secure the injunction on which it was conditioned.

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

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

  
Elizabeth S. Merritt

**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.

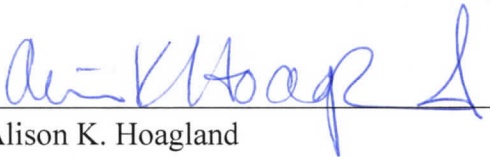
13. If a ballroom were constructed, similar to that which the defendants in this action have proposed to be built on the former site of the East Wing, it would cause permanent and irreparable harm to the White House and President's Park. To have an adjacent structure overshadowing the White House, exceeding 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.

**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. 25-4316

**DECLARATION OF GREGORY B. CRAIG**

I, Gregory B. Craig, hereby declare and state as follows pursuant to 28 U.S.C. § 1746:

1. I am an attorney at the law firm Foley Hoag LLP and am counsel for plaintiff, the National Trust for Historic Preservation in the United States (“National Trust”), in the above-captioned matter.

2. I submit this declaration in support of the National Trust’s Motion for Temporary Restraining Order and Preliminary Injunction, filed herewith.

3. Attached as Exhibit A to this declaration is a true and correct copy of an article by Jonathan Edwards and Dan Diamond titled “Trump hires new White House ballroom architect,” published by the Washington Post and dated December 4, 2025.

4. Attached as Exhibit B to this declaration is a true and correct copy of an article by Jonathan Edwards and Dan Diamond titled “Trump wants a bigger White House ballroom. His architect disagrees,” published by the Washington Post and dated November 26, 2025.

5. Attached as Exhibit C to this declaration is a true and correct copy of an article by Lucinda Prout Janke titled “The President’s Park (Give or Take a Few Acres),” published in the Spring 2010 issue of the Journal of the White House Historical Association.

6. Attached as Exhibit D to this declaration is a true and correct copy of an article by Travis McDonald titled “The East and West Wings of the White House: History in Architecture and Building,” published in the Summer 2011 issue of the Journal of the White House Historical Association.

7. Attached as Exhibit E to this declaration is a true and correct copy, in pdf form, of a webpage maintained by the White House Historical Association and titled “East Wing Fact Sheet,” as it appeared on December 11, 2025.

8. Attached as Exhibit F to this declaration is a true and correct copy of an article by Elizabeth Rees titled “The Office of the First Lady: The Evolution of the East Wing Staff,” published by the White House Historical Association.

9. Attached as Exhibit G to this declaration is a true and correct copy of an article by Ashley Ahn titled “A Look Back at the White House East Wing,” published by the New York Times and dated October 22, 2025.

10. Attached as Exhibit H to this declaration is a true and correct copy of an article by Alexandra Hutzler and Isabella Murray titled “White House East Wing demolished, new images appear to show,” published by ABC News and dated October 23, 2025.

11. Attached as Exhibit I to this declaration is a true and correct copy, in pdf form, of a webpage maintained by the National Park Service and titled “Jacqueline Kennedy Garden,” as it appeared on December 11, 2025.

12. Attached as Exhibit J to this declaration is a true and correct copy of a press release titled “The White House Announces White House Ballroom Construction to Begin” issued by the White House and dated July 31, 2025.



13. Attached as Exhibit K to this declaration is a true and correct copy of an article by Luke Broadwater titled “Inside Trump’s Push to Make the White House Ballroom as Big as Possible,” published by the New York Times and dated November 30, 2025.

14. Attached as Exhibit L to this declaration is a true and correct copy of a letter from Dr. Carol Quillen, President and Chief Executive Officer of the National Trust, to William Scharf, Chair of the National Capital Planning Commission; Jessica Bowron, Acting Director of the National Park Service; and Billie Tsien, Chair of the Commission of Fine Arts, dated October 21, 2025.

15. Attached as Exhibit M to this declaration is a true and correct copy of an article by Gabe Gutierrez, Monica Alba, Peter Alexander, and Dareh Gregorian titled “White House’s entire East Wing to be demolished ‘within days,’ officials say” published by NBC News and dated October 23, 2025.

16. Attached as Exhibit N to this declaration is a true and correct copy, in pdf form, of a webpage maintained by the National Park Service and titled “The White House is a National Park,” as it appeared on December 11, 2025.

17. Attached as Exhibit O to this declaration is a true and correct copy, in pdf form, of a webpage maintained by the National Park Service and titled “Basic Information,” as it appeared on December 8, 2025.

18. Attached as Exhibit P to this declaration is a true and correct copy of a National Capital Planning Commission media release titled “NCPC Welcomes New Chairman and Presidential Appointees,” dated July 14, 2025.

19. Attached as Exhibit Q to this declaration is a true and correct copy of an article by Darlene Superville titled “PHOTOS: White House starts East Wing demolition to build Trump’s ballroom,” published by PBS News and dated October 23, 2025.

20. Attached as Exhibit R to this declaration is a true and correct copy of an article by Irie Sentner titled “Trump taps personal lawyer Will Scharf for White House staff secretary,” published by Politico and dated November 16, 2024.

21. Attached as Exhibit S to this declaration is a true and correct copy of an article by Swapna Venugopal Ramaswamy titled “Trump waltzes into ballroom controversy with ‘two geniuses’ and an East Wing demolition,” published by USA Today and dated October 23, 2025.

22. Attached as Exhibit T to this declaration is a true and correct copy of an article by Peter Nicholas titled “Trump says the new White House ballroom will be ‘a little bigger’ than initially planned,” published by NBC News and dated September 13, 2025.

23. Attached as Exhibit U to this declaration is a true and correct copy of an article by Seung Min Kim titled “WATCH: Trump hosts dinner for donors to \$250 million White House ballroom project,” published by PBS News and dated October 16, 2025.

24. Attached as Exhibit V to this declaration is a true and correct copy of a letter from the American Institute of Architects to Executive Secretary John Stanwich, The Committee for the Preservation of the White House, dated August 5, 2025.

25. Attached as Exhibit W to this declaration is a true and correct copy of a public statement from the Heritage Conservation Committee of the Society of Architectural Historians titled “Statement on the Proposed Ballroom Addition at the White House,” dated October 16, 2025.

26. Attached as Exhibit X to this declaration is a true and correct copy of a social media post from the Truth Social account of Donald J. Trump, dated October 20, 2025.

27. Attached as Exhibit Y to this declaration is a true and correct copy of an article by Kathryn Watson titled “White House begins demolition of part of East Wing for Trump’s ballroom,” published by CBS News and dated October 21, 2025.

28. Attached as Exhibit Z to this declaration is a true and correct copy of an article by David Smith titled “Trump’s ballroom blitz sparks chorus of disgust: ‘The perfect symbol’,” published by The Guardian and dated October 23, 2025.

29. Attached as Exhibit AA to this declaration is a true and correct copy of a press release titled “White House Continues Proud Presidential Legacy,” issued by the White House and dated October 21, 2025.

30. Attached as Exhibit BB to this declaration is a true and correct copy of an article by Marco Hernandez, Junho Lee, and Ashley Wu titled “Trump’s Plans for the East Wing Keep Changing. Here’s a Look,” published by the New York Times and dated October 24, 2025.

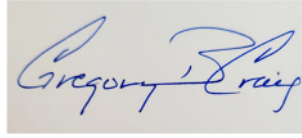
31. Attached as Exhibit CC to this declaration is a true and correct copy of a proposed agenda for the December 4, 2025 meeting of the National Capital Planning Commission.

32. Attached as Exhibit DD to this declaration is a true and correct copy of an article by Dan Diamond titled “White House fires arts commission expected to review Trump construction projects,” published by the Washington Post and dated October 28, 2025.

33. Attached as Exhibit EE to this declaration is a true and correct copy, in pdf form, of a webpage maintained by the Commission of Fine Arts and titled “Who We Are,” as it appeared on December 11, 2025.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 12th day of December, 2025.

A handwritten signature in blue ink, reading "Gregory B. Craig", is shown within a rectangular frame. The signature is written in a cursive style with a horizontal line through the middle of the name.

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Gregory B. Craig

# **EXHIBIT A**

*Democracy Dies in Darkness*

## Trump hires new White House ballroom architect

Although the president and the original architect had clashed over the size of the project, the decisive factor was the small firm's limited capacity to handle such an enormous project.

December 4, 2025

By Jonathan Edwards and Dan Diamond

President Donald Trump has replaced the architect he handpicked to design his White House ballroom, according to three people familiar with the project, ending the involvement of a boutique firm whose selection raised questions from the start about whether it had the capacity to complete the massive, high-profile endeavor.

For more than three months, James McCrery II and his namesake architecture firm led the effort to design Trump's \$300 million ballroom building — until late October, when he stopped working on the project, one of the people said. It is unclear whether McCrery stepped back voluntarily, but the men parted on good terms and remain so, according to one of the people familiar with the project, all of whom spoke on the condition of anonymity to discuss internal conversations.

Trump and McCrery had clashed over the president's desire to keep increasing the size of the building, but it was McCrery's firm's small workforce and inability to hit deadlines that became the decisive factor in him leaving, one of the people said.

Trump has chosen architect Shalom Baranes, who's been designing and renovating government buildings in Washington for decades, to pick up the mantle, according to two of the people. Baranes's firm has handled a number of large Washington projects dating back decades, including projects involving the main Treasury building near the White House, the Federal Reserve and the headquarters of the General Services Administration.

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Baranes led a \$1 billion renovation of the Pentagon immediately after the terrorist attacks of Sept. 11, 2001, which he described as his “proudest moment” in a 2017 Washington Post op-ed. His architectural approach, which includes modernist buildings, is different from McCrery’s classical style.

“As we begin to transition into the next stage of development on the White House Ballroom, the Administration is excited to share that the highly talented Shalom Baranes has joined the team of experts to carry out President Trump’s vision on building what will be the greatest addition to the White House since the Oval Office — the White House Ballroom,” White House spokesman Davis Ingle said in a written statement. “Shalom is an accomplished architect whose work has shaped the architectural identity of our nation’s capital for decades and his experience will be a great asset to the completion of this project.”

The White House and McCrery’s representative have said that McCrery remains involved in the project in a “consulting” role.

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A top Trump deputy said Thursday that the White House expects to submit ballroom plans this month to the National Capital Planning Commission, a 12-member board charged by Congress with overseeing federal construction projects.

Will Scharf, who serves as the president's staff secretary and was tapped by Trump this summer to lead the NCPC, said at a public meeting Thursday that the commission would review the ballroom plans "at a normal and deliberative pace." He said that other White House officials had not shared information about the ballroom with him, but that he expected more details about the project to come soon.

"I'm excited for NCPC to play a constructive role in what I expect will be one of the most important projects in the true core of Washington, D.C., for many years to come," Scharf said at the meeting.

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The lack of NCPC involvement in a project until months into demolition and site prep is not normal, especially for one as large and symbolically meaningful as the ballroom building. A security fence and a tennis pavilion — neither of which involved the White House itself — each took more than a year to move through the NCPC.

Before formally submitting proposals, planners at federal agencies typically contact NCPC staff as part of a rigorous, four-step review, ending with a presentation at a public commission meeting. At each stage, commission staff and commissioners give feedback on details ranging from aesthetics to environmental impacts.

In such cases, agencies have typically held off on demolition, site prep or construction until getting the commission's approval.

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The White House has shared few details about the project's specifications beyond its seating capacity, square footage and that the government plans to rely on private donations to fund construction. The approach has drawn complaints from outside architects, historic preservationists and Democrats who say Trump owes the public more transparency about a major project that will reshape the White House's grounds.

White House officials have said that they did not seek NCPC approval to demolish the East Wing because only new construction, not demolition, falls under the commission's purview.

Historic preservationists have said the White House should have waited for federal advisory panels to review and sign off on the project. Sen. Richard Blumenthal (D-Connecticut) on Thursday introduced legislation, dubbed the “No Palaces Act,” that would require demolition on the White House grounds to trigger NCPC review, require congressional authorization to use private funds for White House construction and impose other restrictions on projects. Members of Congress would also be allowed to file an injunction to enforce the law.

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“There ought to be a right on the part of a member of Congress to seek a court order stopping this kind of absolutely atrocious destruction,” Blumenthal told The Post. “It’s not Donald Trump’s house, it’s the people’s house.”

Trump has had his own concerns about the project, including whether his original architect could finish the job on Trump’s timeline: before the end of his second term.

The ballroom building — at 90,000 square feet and estimated to hold nearly 1,000 guests and cost \$300 million — was from the start a herculean task for McCrery, said people familiar with his firm’s operations. That might have been true for any firm given Trump’s rushed timeline, but it was especially difficult for the head of a small firm better equipped to design churches, libraries and homes.

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Trump's selection of the firm raised eyebrows among architects and planning experts worried that a shop as small as McCrery's couldn't complete such a large project in little more than three years. One architect said federal officials tasked with awarding contracts would normally consider only firms four times bigger than McCrery's to take on projects of that scale.

Those concerns grew almost immediately, according to one of the people, who spoke on the condition of anonymity about the project.

"Everybody realized he couldn't do it," the person said.

McCrery's spokesman did not respond to requests for an interview.

The renovation represents one of the biggest changes to the White House in its 233-year history, and has yet to undergo any formal public review. The administration has not publicly provided key details about the building, such as its planned height. The structure also is expected to include a suite of offices previously located in the East Wing. The White House has also declined to specify the status of an emergency bunker located beneath the East Wing, citing matters of national security.

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In the weeks since the switch from McCrery to Baranes, crews of dozens of workers have continued to prep the site for construction, driving piles, stockpiling materials such as reinforced concrete pipes and amassing an array of cranes, drills and other heavy machinery, photos obtained by The Post show. On Wednesday, they erected a towering crane anchored into a concrete paddock.

On Tuesday, Trump said during a Cabinet meeting that the pile drivers operate “all night” and have created a disagreement in his marriage. The president said he loves the sound while first lady Melania Trump has asked him to make the constant pounding stop, a request he’s denied.

“Sorry, darling, that’s progress,” Trump said he told her.

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### What readers are saying

The comments express strong criticism of President Trump's decision to replace the original architect for the White House ballroom project. Many commenters highlight concerns about the lack of planning and foresight, with some predicting that the project will result in a costly... [Show more](#)

This summary is AI-generated. AI can make mistakes and this summary is not a replacement for reading the comments.

# **EXHIBIT B**

 [www.washingtonpost.com /politics/2025/11/26/trump-ballroom-architect-james-mccrery/](https://www.washingtonpost.com/politics/2025/11/26/trump-ballroom-architect-james-mccrery/)

## Trump wants a bigger White House ballroom. His architect disagrees.

Jonathan Edwards, Dan Diamond : 7-8 minutes : 11/26/2025

President Donald Trump has argued with the architect he handpicked to design a White House ballroom over the size of the project, reflecting a conflict between architectural norms and Trump's grandiose aesthetic, according to four people who spoke on the condition of anonymity to describe internal conversations.

Trump's desire to go big with the project has put him at odds with architect James McCrery II, the people said, who has counseled restraint over concerns the planned 90,000-square-foot addition could dwarf the 55,000-square-foot mansion in violation of a general architectural rule: don't build an addition that overshadows the main building.

A White House official acknowledged the two have disagreed but would not say why or elaborate on the tensions, characterizing Trump and McCrery's conversations about the ballroom as "constructive dialogue."

"As with any building, there is a conversation between the principal and the architect," said the official, who spoke on the condition of anonymity to discuss private conversations. "All parties are excited to execute on the president's vision on what will be the greatest addition to the White House since the Oval Office."

McCrery declined an interview request through a representative who declined to answer questions about the architect's interactions with Trump in recent weeks.



### **Follow** Trump's second term

Trump's intense focus on the project and insistence on realizing his vision over the objections of his own hire, historic preservationists and others concerned by a lack of public input in the project reflect his singular belief in himself as a tastemaker and obsessive attention to details. In the first 10 months of his second term, Trump has waged a campaign to remake the White House in his gilded aesthetic and done so unilaterally — using a who's-going-to-stop-me ethos he honed for decades as a developer.

Multiple administration officials have acknowledged that Trump has at times veered into micromanagement of the ballroom project, holding frequent meetings about its design and materials. A model of the ballroom has also become a regular fixture in the Oval Office.

The renovation represents one of the largest changes to the White House in its 233-year history, and has yet to undergo any formal public review. The administration has not publicly provided key details about the building, such as its planned height. The 90,000-square-foot structure also is expected to host a suite of offices previously located in the East Wing. The White House has also declined to specify its plans for an emergency bunker that was located below the East Wing, citing matters of national security.

On recent weekdays, a bustling project site that is almost entirely fenced off from public view contained dozens of workers and materials ready to be installed, including reinforced concrete pipes and an array of cranes, drills, pile drivers and other heavy machinery, photos obtained by The Washington Post show.

Plans for the addition as of Tuesday had not been submitted to the National Capital Planning Commission, a 12-member board charged by Congress with overseeing federal construction projects and [now led by Trump allies](#). A preliminary agenda for the commission's next meeting, scheduled for Dec. 4, does not include the ballroom project under projects expected to be covered at the meeting or reviewed by the body in the next six months. White House officials say that the administration still plans to submit its ballroom plans to the commission at "the appropriate time."

The administration's [rapid demolition](#) of the East Wing annex and [solicitations from companies and individuals](#) to fund the new construction have caused controversy over the project, which Trump believes the White House needs to host special events. Democrats, historical preservation groups and some [architects](#) have criticized the project's pace, secrecy and shifting specifications. The White House initially said this summer that the ballroom would cost \$200 million and fit 650 people, while Trump in recent weeks asserted that it could cost \$300 million or more and would fit about 1,000 people.

McCrery has kept his criticism out of the public eye, quietly working to deliver as Trump demanded rushed revisions to his plans, according to two of the people with knowledge of the conversations. The president — a longtime real estate executive who prides himself on his expertise — has repeatedly drilled into the details of the project in their Oval Office meetings, the people said.

McCrery has wanted to remain with the project, worried that another architect would design an inferior building, according to a person with knowledge of his thinking.

McCrery, a classical architect and the founder and principal of McCrery Architects, had designed works like the U.S. Supreme Court bookstore and the pedestal for President Ronald Reagan's statue in the U.S. Capitol. The ballroom was the largest-ever project for his firm, which has specialized in designing churches, libraries and homes.

Trump hired McCrery for the project on July 13. Eighteen days later, the White House announced the ballroom project, with officials promising to start construction within two months and finish before the end of Trump's second term.

Trump also appointed McCrery in 2019 to serve a four-year term on the U.S. Commission of Fine Arts, which provides advice to the president, Congress and local government officials on design matters related to construction projects in the capital region.

Democrats have pressed the White House and its donors for more details on the planned construction and what was promised to financial contributors. The ballroom is being funded by wealthy individuals and large companies that have contracts with the federal

government, including Amazon, Lockheed Martin and Palantir Technologies. (Amazon founder Jeff Bezos owns The Post.)

Several donors have cast the decision in statements as an investment in the future of a building that belongs to the American people, pushing back on the suggestion that their largesse was intended to curry favor with Trump.

A donor list released by the White House of 37 businesses and individuals who underwrote the ballroom is not comprehensive, administration officials acknowledged, leaving open the possibility that millions of dollars have been funneled toward the president's pet project with no oversight.

"Billionaires and giant corporations with business in front of this administration are lining up to dump millions into Trump's new ballroom — and Trump is showing them where to sign on the dotted line," Sen. Elizabeth Warren (D-Massachusetts) said in a [statement](#) last week. Warren and her colleagues also introduced legislation that would impose restrictions on White House construction and require more transparency from donors.

*Kara Voght contributed to this report.*



# **EXHIBIT C**

# WHITE HOUSE HISTORY

**The White House Neighborhood**

**Journal of the White House  
Historical Association**

Number 27

# WHITE HOUSE HISTORY



White House Historical Association  
Washington

NUMBER TWENTY-SEVEN • SPRING 2010

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# The President's Park

## (Give or Take a Few Acres)

LUCINDA PROUT JANKE

A recent magazine article described the garden of the White House, "known as the President's Park," as covering 82 acres and encompassing Lafayette Park and the Ellipse.<sup>1</sup> Surrounded by a large fence, the White House indeed appears to be sited in spacious grounds, but the present White House grounds are only about 18 acres, less than a quarter of the original reservation. The original plans for both the president's residence and its setting were much more ambitious. Included in Peter Charles L'Enfant's 1791 concept for the new Federal City, the executive mansion was sited prominently on a rise as seen today from the north, and on the south built into a ridge, all surrounded by a tract of more than 80 acres. The designer labeled the reserve "President's Park." Today, however, most people perceive of Lafayette Park, the White House grounds, and the Ellipse as separate areas. All were—and are—part of the grounds designated by L'Enfant as the President's Park.

L'Enfant's original plans for the president's grounds are more clearly defined. The boundaries stretched from H Street on the north to Tiber Creek

(now Constitution Avenue) on the south, bordered on the east by Fifteenth Street, NW, and on the west by Seventeenth Street. The residence was to have been located at the northern end of these grounds, visible from the Capitol down Pennsylvania Avenue and for many miles from the south, as its sweeping vistas looked to the Potomac River and beyond. Wide terraces were to cross the entire tract south of the residence, roughly at E Street. To the north was to be a forecourt where five major avenues converged, an urban planning device familiar in front of palaces in European capitals.

The five spokelike streets were never extended all the way to the President's House. A map drawn for one of the owners of the land upon which the President's Park was located shows these avenues—extensions of Connecticut Avenue, Sixteenth Street, and New York Avenue—along with an early footprint of the "president's palace." Samuel Davidson, a Georgetown merchant, had purchased this land, known in part as the Port Royal Tract, in 1791 and 1792, anticipating profits from selling lots when the government acquired it. The boundary between Davidson's acquisition and that of David Burns, whose family had owned their land for three generations, passed through what would become the President's Park.

Changes in L'Enfant's perfectly rectangular park began almost immediately, the first when city squares were created in the northernmost corners of the park. These appear already established in the 1792 engraving of the city plan. The next alteration of the President's

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*Pierre Charles L'Enfant's 1791 "Plan of the City Intended for the Permanent Seat of the Government of the United States," reproduced in 1887 as a facsimile by the U.S. Coast and Geodetic Survey Office. The President's Park is labeled "I," rising north from the Mall.*





1791. Detail of the President's Park and foundations for the presidential residence as originally conceived by L'Enfant.

Park involved significant changes to the size and location of the presidential residence. L'Enfant's concept of the building is unknown, lost when the ambitious but contentious Frenchman was fired after less than a year of service. But its footprint as laid out was about four times the size of the White House as built.

Faced with the loss of the city's designer, and thus no house plans, George Washington held an architectural competition for both the Capitol and the President's House. James Hoban, awarded the White House prize, presented a building more in the scale of a large country house in England or Ireland than the palace envisioned by L'Enfant. By this time the cellar for the larger building was already near completion. Hoban's building was located on the northern end of the great chasm the cellars formed; President Washington himself drove the stakes siting the building to come, and thus removed the President's House from the Pennsylvania Avenue axis or vista intended by L'Enfant.<sup>1</sup>

The park was further diminished by public buildings. Well before the President's House was completed, two buildings were introduced to the grounds on President Washington's orders, to end a dispute between himself and Congress over where offices for the public



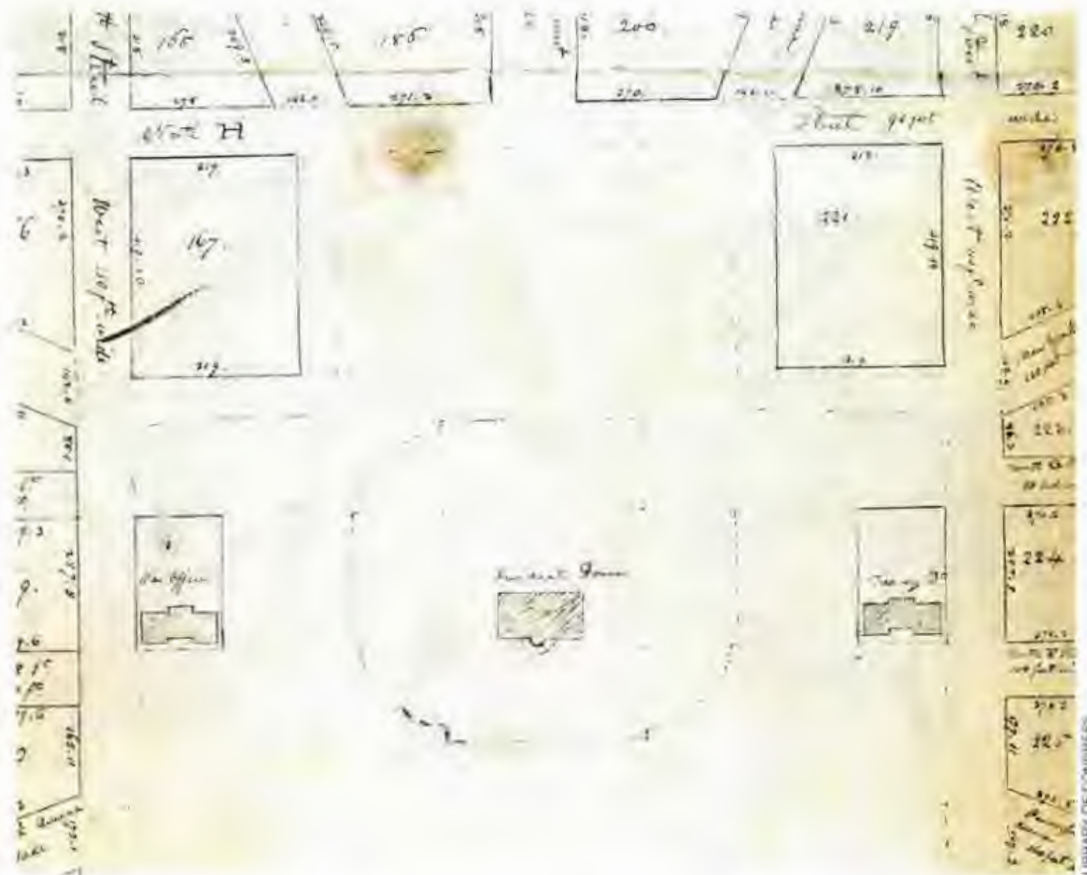
1792. Detail of the first "Official Plan" for the city of Washington, reflecting significant changes to the size and location of the foundations.

employees should be housed. The difference was, of course, over controlling the workers, but Washington's idea that the executive needed the staff nearby won out. In time this decision, purely political, would bring the major incursion into the President's Park. The Treasury Department Building was begun late in 1798, east of the President's House. Erection of a similar structure to house other executive departments began on the west in 1799. Robert King's 1798 map shows these two as yet incomplete buildings, both similar in size. Built close to the street, they were aligned with the squares to the north, at some distance from the residence. When the government moved from Philadelphia in 1800, the Treasury Department, with its sixty-five employees, was the first to arrive. It is certain that George Washington never imagined dwarfing the President's House, as do the present Treasury on the east, and State, War and Navy Building on the west, built on the sites half a century after his time.

The next important development in the history of the President's Park occurred with the change of administration in 1801. John Adams lived in the house only a few months. His wife, Abigail, in an oft-quoted letter, described the house as habitable but noted that "we have



1798. A map of President's Square drawn in August 1798 by the government surveyor Robert King shows the President's House positioned between two yet unfinished buildings: the Treasury Department on the east and a similar structure meant to house the other executive offices on the west, War, Navy, State, and the Post Office.



not the least fence, yard or other convenience without.”<sup>13</sup> Adams’s successor, Thomas Jefferson, lived in the White House for the next eight years and took an active interest in both the house and its grounds. Of particular relevance to the President’s Park are the wings he added to the residence and his decision to fence and develop the landscape of the grounds.

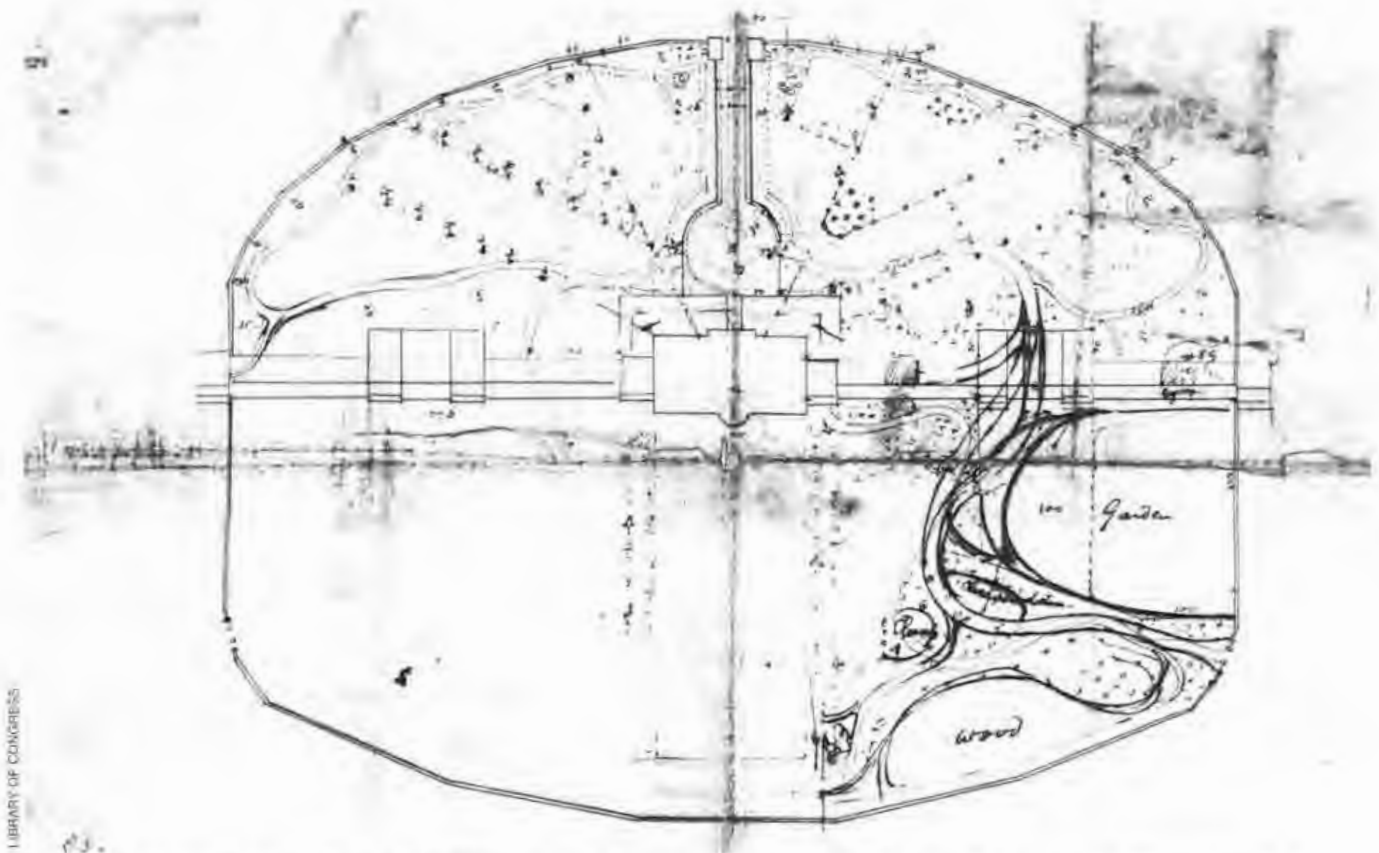
Jefferson ordered the grounds fenced with a 12 foot stone wall on the south and rail fencing on the other three sides. The result by 1808 was a 5 acre site, the first time the grounds had been enclosed around the President’s House. Early in his administration Jefferson began planning for the east and west wings, to connect the residence with the executive office buildings, as well as to conceal the homely “offices” needed for the house, such as wash facilities and a smokehouse. Construction began on these wings in 1805 but neither was completed as designed; indeed, their lengths were cut in half as built. An early nineteenth-century sketch, believed to be by Jefferson or the public architect Benjamin Henry Latrobe or both, shows the design for the wings, fencing, and plantings. This plan introduced the concept of separate White House grounds within the President’s Park. The north side was the public entrance, and the south

was reserved for private use and future pleasure gardens. This division of the grounds continues to this day.

Included in the sketch was a carriageway through the park, with a monumental entrance arch-of-triumph where Pennsylvania Avenue dead-ended at the President’s Park. This arch was actually built, a huge confection in stucco with sandstone trim and wooden gates, and doubtless was meant to compensate for loss of the grand climax the “palace” would have made to the avenue, had it been built. It stood until 1859, when it fell before the south expansion of the Treasury Building.

A decade later, after the White House and office buildings were burned during the British invasion of the city in August 1814, all were rebuilt; however, Congress authorized the erection of two additional structures to house the four executive departments. A separate building for the State Department rose to the north of the Treasury Department Building, on the east side of the grounds; the War and Navy Departments occupied the west side in two separate buildings.

The President’s Park served for several years after the War of 1812 as a construction station for the reconstruction of the White House. A sketch of Saint John’s Church made by Latrobe about 1816 depicts a horse and



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1802–5. Landscape plan for the White House grounds apparently sketched by Thomas Jefferson, with Henry Latrobe's penned suggestions, introduced the concept of separate White House grounds within the President's Park.

rider on a barren stretch between the church, completed on the north edge of the President's Park in 1816, and the as yet unrepaired White House. The roadway may have been more of a country lane at this time. By the mid-1820s Pennsylvania Avenue had been cut across the President's Park between Fifteenth and Seventeenth Streets. The insertion of this broad, rather roundabout extension of the capital's main street created a strong physical and psychological separation of the White House grounds from the northern side of the President's Park.

Only after completion of repairs following the fire of 1814 was the park to the north cleared, graded, and planted, orchardlike, with alternate slow-growing elms and fast-growing Virginia red cedar trees. Quick shade was provided by the cedars, while the elms, considered permanent, took their time growing up. Architect Charles Bulfinch devised the plan, allowing for streets to border the park. New north-south streets in the President's Park appear on Robert King's 1818 map of the city, as do streets on the south side of the two

squares. However, these do not yet connect to a street immediately north of the White House, where Pennsylvania Avenue is today. The rest of the President's Park appears intact on King's map and in his field notes, as yet uninvaded by other new streets and avenues. By the time of President James Monroe's public reception on New Year's Day 1818, the first held in the rebuilt White House, the immediate grounds had been fenced in and wrought iron gates installed on the north side of the White House, along with two pairs of stone piers, the same in use today. These served to further distance the park to the north from the White House grounds. After the visit of the Marquis de Lafayette in 1824 and 1825, the park on the north was named "Lafayette Park" and further severed from the White House grounds. Formally, the park is still Lafayette Park; the term "Lafayette Square" refers to the houses facing the park.

In 1833, approximately the year President Andrew Jackson completed the landscaping of the grounds, the Treasury Department Building burned to its walls. This





1818. The "Map of the City of Washington" by surveyor Robert King showing new north-south streets bordering the President's Park. When Pennsylvania Avenue was brought around to pass before the White House, these side streets would be connected to it. A drover's path was cut through the President's Park on the South (I) but it is not shown here, nor is the high stone wall Jefferson built, more or less following the curve in the terrain, shown in the map.



was the third fire that had ravaged it, the first in 1800 on upper floors in office papers, the second at the behest of the British in 1814. The third was as devastating as the second, resulting in demolition of the surviving brick walls and construction of a much larger “fire-proof” structure in stone, lined with brick. This was the beginning of half a century of major expansion of the departmental buildings next to the White House.

Robert Mills was selected to design the new Treasury Department Building. His architecturally impressive colonnade along Fifteenth Street, reminiscent of neoclassical buildings contemporary to it in Europe, walled off the President’s Park. The Treasury Department Building would continue to grow, beginning in 1836, until it reached the present size in 1869. The old State Department Building was demolished to make way for the Treasury’s north wing. Considered to be the largest Greek Revival structure in the world, the completed Treasury Building ultimately covered 5 acres of the President’s Park. But this was not quite the end of the local expansion of the Treasury, which in 1919 erected an annex across Pennsylvania Avenue in the square occupying the northeast corner of the original President’s Park.

Following the Civil War, plans were made to replace the department buildings on the west side of the White House with one flamboyant building of great size. The result was the massive State, War and Navy Building, which rose between 1871 and 1888. The Second Empire-style building had a footprint similar to its counterpart on the east; it, too, walled off the President’s Park. The White House was now flanked by two buildings much taller and larger than itself. Late nineteenth-century efforts to expand it to match came to nothing and were silenced forever in the restoration and remodeling by Theodore Roosevelt in 1902.

Organization and ornamentation of the White House grounds were piecemeal until 1850, when President Millard Fillmore engaged the noted landscape designer Andrew Jackson Downing—self-styled a “rural architect”—to develop plans for the grounds north and south of the White House as well as the Mall. This southernmost section of the park had been known for many years as the White Lot; explanations of the origins of the name vary.

It was marshy in wet seasons and had been a concern of inhabitants of the White House and the general

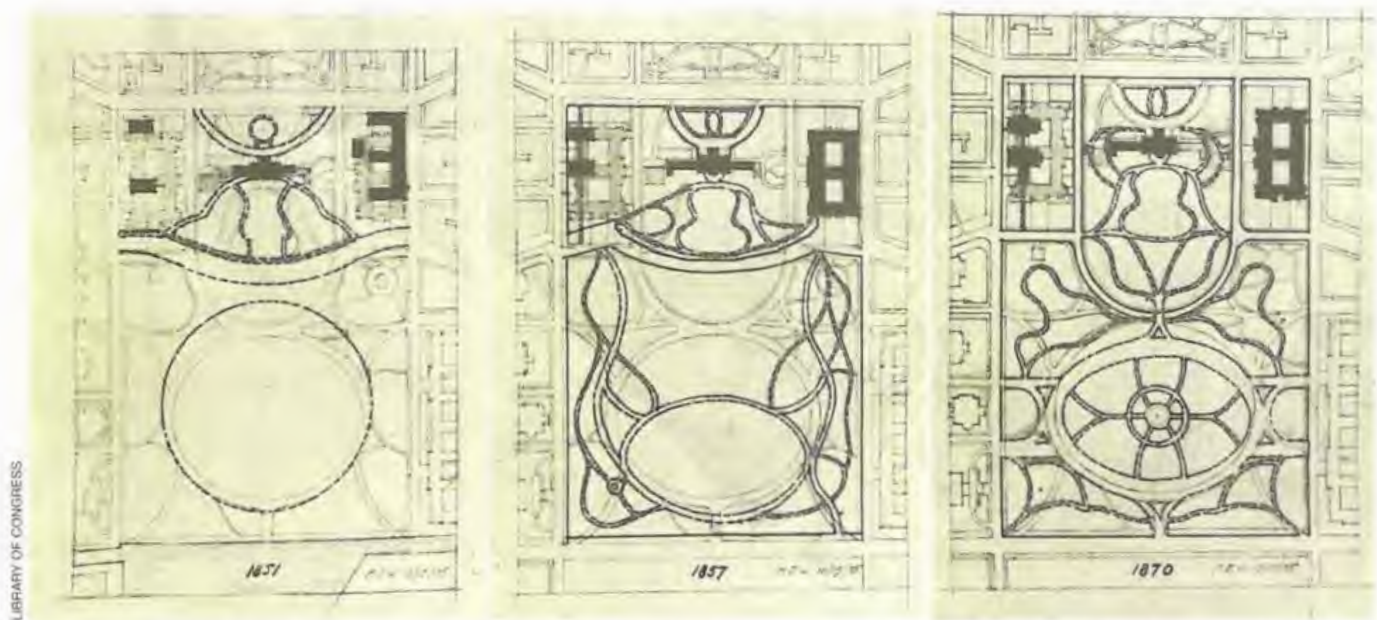
area from the city’s very beginning. Downing called for filling it, raising the grade substantially, and laying out a circular parade formally planted with trees, all enhanced by footpaths and shady retreats. His death in a steam-boat explosion in 1852, along with the growing political tensions that led to the Civil War, delayed the implementation of these plans. But Downing’s idea survived and influenced later developments of the President’s Park, in particular the section now known as the Ellipse, an oval substituted for his envisioned circle.

On the north, the dedication in 1853 of Clark Mills’s equestrian statue of Andrew Jackson in Lafayette Park occasioned the installation of cast-iron fencing and new plantings. The unnamed thoroughfares on the west and east became Jackson Place and Madison Place.<sup>6</sup> In 1891 a statue honoring Lafayette’s service in the American Revolution was unveiled on the southeast, the first of four significant bronze sculptures on the corners of the park.

The statues and subsequent landscape designs further defined the 7-acre Lafayette Park as a separate entity. Efforts to improve the President’s Park gained impetus after the Civil War, when, in the late 1860s, a plan to build a new president’s residence were abandoned. East Executive Avenue was cut through between the Treasury Building and the White House in 1866, and in 1871 West Executive Avenue was opened, linking for the first time the north and south parts of the President’s Park. Directing these changes was General Orville Babcock, aide-de-camp to General Ulysses S. Grant during the Civil War and a close friend who became private secretary when Grant became president. Babcock was an engineer with an interest in landscape, and Grant was quite comfortable with the fact that maintaining the White House had been placed under the Army Corps of Engineers. Babcock was given free hand. One of his many projects at the White House was demolishing Jefferson’s high stone wall on the south. Babcock, who made extensive improvements to city parks and streets as well, thus enlarged the White House grounds to the south. East and West Executive Avenues, now completed, were extended into the grounds south of the White House, forming a semicircle. The street rounding the circle became South Executive Avenue.

The land south of the White House grounds, the White Lot beyond Babcock’s new iron fence, was being filled by wagon- and cartload of topsoil, but it remained





A series of maps dated 1851, 1857 and 1870 in the Library of Congress shows the evolution of the buildings, roadways, paths and design of the area known first as the "parade," later as the Ellipse. The buildings on either side of the White House gradually increased in size while Downing's circular parade became an oval ellipse. Below: An isometrical view of the President's House, the surrounding public buildings, and private residences drawn c. 1857. It anticipates new and expanded government buildings, some never to be realized, and omits such landmarks as the Jackson equestrian statue in Lafayette Park.







Joseph Passonneau's axonometric map of the city in the year 2000 shows further developments in the area of the President's Park. To the right of the Ellipse the large single large building is the 1928 Commerce Department; beyond it is the west end of the Federal Triangle complex, 1910-38. While the 19th-century Ellipse and executive buildings appear much the same as they have for a century, north of the White House, however, the large new government buildings of the 1960s and 1970s loom over the restored row houses of Lafayette Park.



unfinished when Rutherford B. Hayes became president in 1877. A quarter-century after its design by Downing, the circular parade became a 17-acre “ellipse,” believed to be the largest in the world.<sup>5</sup> This section of the President’s Park was laid out from 1877 to 1880 by the Army Corps of Engineers, primarily under the direction of Lieutenant Colonel Thomas Lincoln Casey. His annual reports document the use and adaptation of the Downing design and the final filling of the White Lot using soil excavated from the cellars of the State, War and Navy Building then rising. In the collections of the Library of Congress is a map probably used as a plan to develop the Ellipse.<sup>6</sup> The circular roadway bordering the Ellipse became tangential to South Executive Avenue. No new roadways were cut into the President’s Park except for access to the Ellipse, but the development of this area as an integral unit also divided presidential parkland. The landscaping of the Ellipse and the eventual cutting through of E Street increased the separation of the southern portion of the park from the White House grounds. The final partitioning of the President’s Park into the sections we now know was nearly complete.

Many of the twentieth-century changes in the President’s Park have resulted from changes in the roads, except for E Street, which already cut across the tract. A 1922 map shows E Street invading the area from the east but not yet the west.<sup>7</sup> Security considerations during World War II necessitated the closing of West Executive Avenue to the public, because by then the executive offices had spilled over from the West Wing to the State, War and Navy Building, and access between the two was in the open air, across that street. The avenue was never reopened. East Executive Avenue was closed in 1987, also a security measure to better control approach to the White House from the east or everyday entrance. Pennsylvania Avenue was closed to vehicular access in 1995; E Street soon followed. The portion of the President’s Park below Lafayette Park and above E Street became, for all intents and purposes, a hard-to-access secured area demarcated by guardhouses, Jersey barriers, and bollards. Security efforts serve to emphasize the increased isolation of the central section of the President’s Park.

The executive departments occupying the old State, War and Navy Building gradually left for other locations; the vast beehive of offices was given over to the use of the White House so that this area was effectively

returned to the use of the president, if not to parkland. The Treasury Department remains firmly in place in its original location. Each occupies about 5 acres of the park. The National Park Service was given jurisdiction over the President’s Park in 1933, and the Army Corps of Engineers’ nearly seventy years of authority ended. A brochure available at the White House Visitors’ Center in early 2008 includes a map and walking tours of the President’s Park. The name is used on Park Service literature as well as signs in the area, but it rarely appears in maps or guidebooks. And an informal survey reveals that even longtime residents of the city are not familiar with the term, nor do they perceive of the area by the name of the President’s Park.

What began as decisions by President Washington in the late eighteenth century was only the beginning of the partitioning of this large tract. The sections cut off the President’s Park and given other names are well known: the Ellipse, the White House grounds, Lafayette Park, General William T. Sherman’s equestrian statue and its surrounding plaza, the grounds of the Treasury, and the Old State, War and Navy Building, now renamed the Eisenhower Executive Office Building. The larger context, the President’s Park, while it remains a legal preserve within the capital, has surrendered its own identity otherwise to its parts.

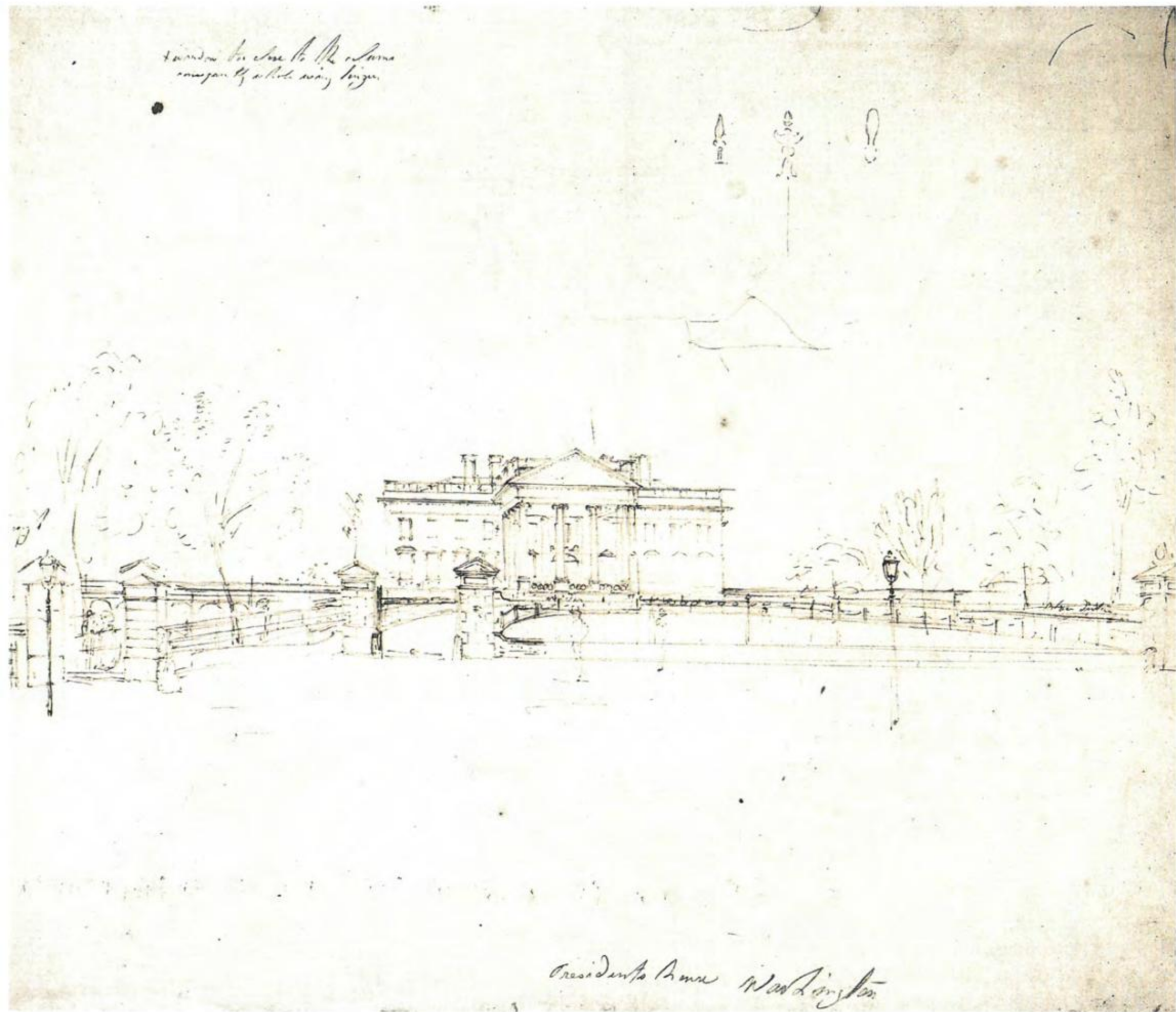
## NOTES

1. Gerald Clarke, “At Home with History in the White House,” *Architectural Digest*, March 2008, 166.
2. Andrew Jackson was long criticized for cutting away the view of the White House from Pennsylvania Avenue, but it was in fact George Washington who placed the White House where it is, out of the axis L’Enfant had created between his “palace” and the Capitol. See William Seale, *The White House: The History of an American Idea* 2nd ed. (Washington, D.C.: White House Historical Association, 2001), 26.
3. Letters of Abigail Adams published by Charles Francis Adams in 1840, at [www.familytales.org](http://www.familytales.org).
4. *National Intelligencer*, December 30, 1858 and corrected by ordinance February 11, 1859, cited in Wilhelmus Bogart Bryan, *A History of the National Capitol from Its Foundation Through the Period of the Adoption of the Organic Act*, vol. 2, 1853–1878 (New York: Macmillan, 1916), 330.
5. Clark Kimberling, “The Shape and History of the Ellipse in Washington, D.C.,” essay published on the web as <http://faculty.evansville.edu/ck6/ellipse.pdf>. A professor of mathematics at the University of Evansville in Indiana, Kimberling focuses on the dimension and shape of the Ellipse as well as other geometric shapes in the city plan, and in particular the method of laying out the Ellipse. This latter quest led him to explore its history through the papers of Lieutenant Colonel Thomas Lincoln Casey, to no avail.
6. Map dated September 29, 1877. Library of Congress, Washington, D.C., G7852.W46.1877.US.
7. U.S. Geological Survey Map compiled for *Ridley’s Washington* (New York: Henry Holt, 1922).

# **EXHIBIT D**



London to see the House  
comparatively whole being larger



President's House Washington



# The East and West Wings of the White House

## History in Architecture and Building

TRAVIS MCDONALD

**O**n a cold March 11, 1809, Thomas Jefferson paid the ferryman \$1 to take him and his carriage across the Potomac River at Georgetown and headed south toward retirement. What he left behind at the President's House were unfulfilled dreams of remodeling the still-unfinished mansion and completing its partly built domestic service wings, which were entirely his idea. It is ironic, in retrospect, that these wings, with their zigzag roofs and flat terrace platforms, would become his physical heritage there, because they have been mostly forgotten.

If the White House is, as the historian William Seale has written, "an American Idea," it includes one of Jefferson's most tenacious architectural ideas—domestic service wings. Jefferson did not invent the concept but borrowed it from those seen attached to Renaissance villas in Andrea Palladio's *Four Books of Architecture* (1570). Domestic service wings appear in Jefferson's earliest drawings for his bookish Palladian-style home, Monticello, built in the early 1770s. Placing

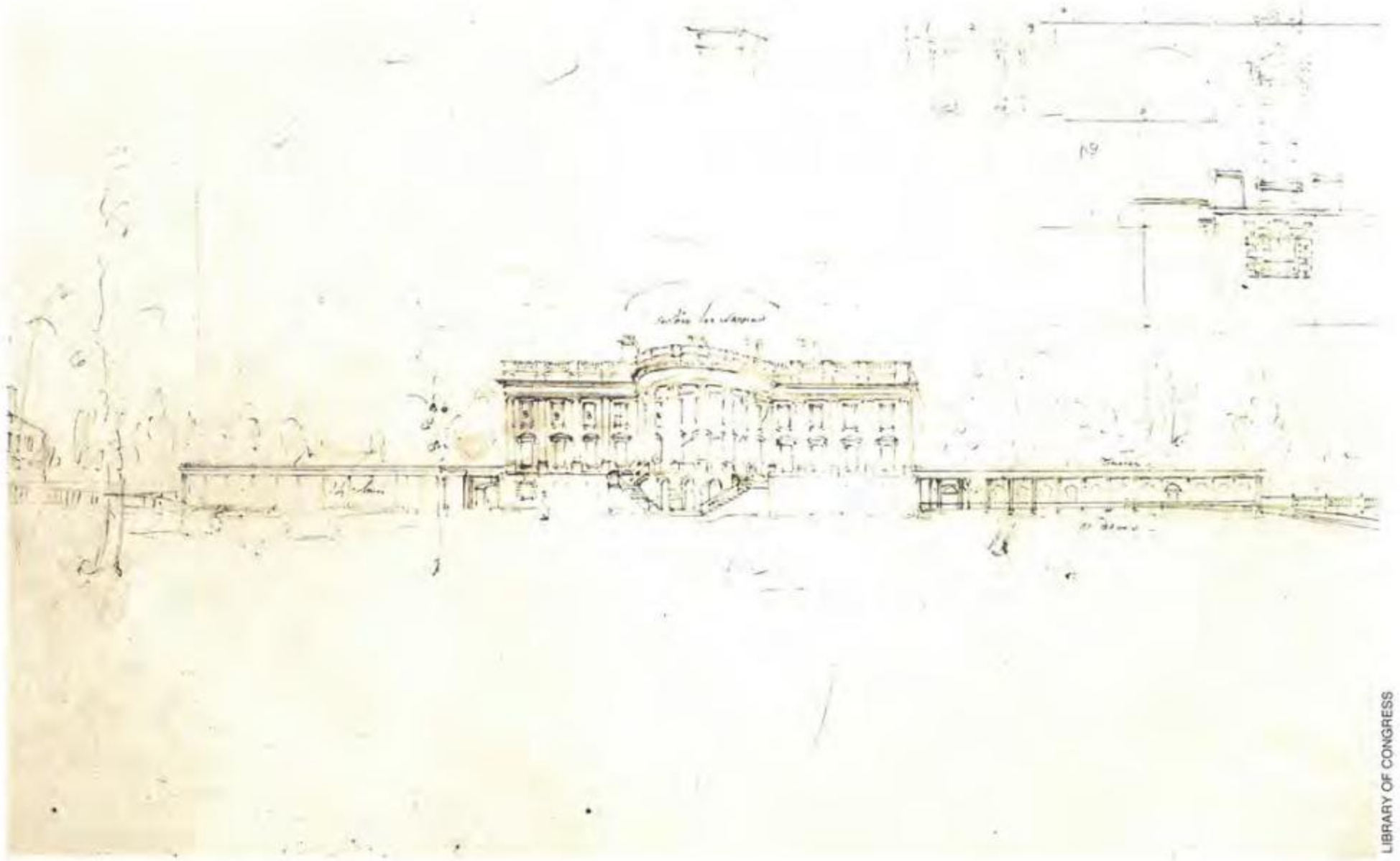
domestic outbuilding functions in wings gave order to what would have been the typical scattered backyard arrangement of necessary buildings; more important for Jefferson, it saved the space for ornamental landscaped gardens. He adapted the same ideal for the White House.

Urban houses of pretense needed the same domestic services as large country houses. In America those functions were squeezed into backyard spaces as connected or detached buildings, while in Europe they filled the lowest floor and continued into connected wings or were separated and grouped as service courts. The overall service requirements of the White House amplified those of even large urban American houses on small lots like the ones George Washington and Jefferson had used in Philadelphia. Pierre Charles L'Enfant, in his famous plan for the Federal City, had, in fact, indicated a palace-derived solution for the White House with greatly extended wings and terraced ensembles. Washington, however, especially liked James Hoban's Irish Georgian house design and declared it the winner of the architectural competition for the President's House in 1792.<sup>2</sup> Historians have indicated that Washington and Hoban actually discussed wings on the house, but details are not known and Hoban confined the immediate service needs to the basement story of the White House.<sup>3</sup> He probably rationalized that typical food-related functions could be supplemented through daily trips to the local meat and produce market, as indeed happened.

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1. *Drawing of the White House from the north by John Rubens Smith, c. 1833. Recently discovered at the Library of Congress, this previously unpublished image provides details of the house as it was and clues to Andrew Jackson's changes, as, for example, his 1833 relocation of the stone gate piers that still stand today.*





2. Drawing of the White House from the south by John Rubens Smith, c. 1833, showing the east and west wings in Andrew Jackson's era.

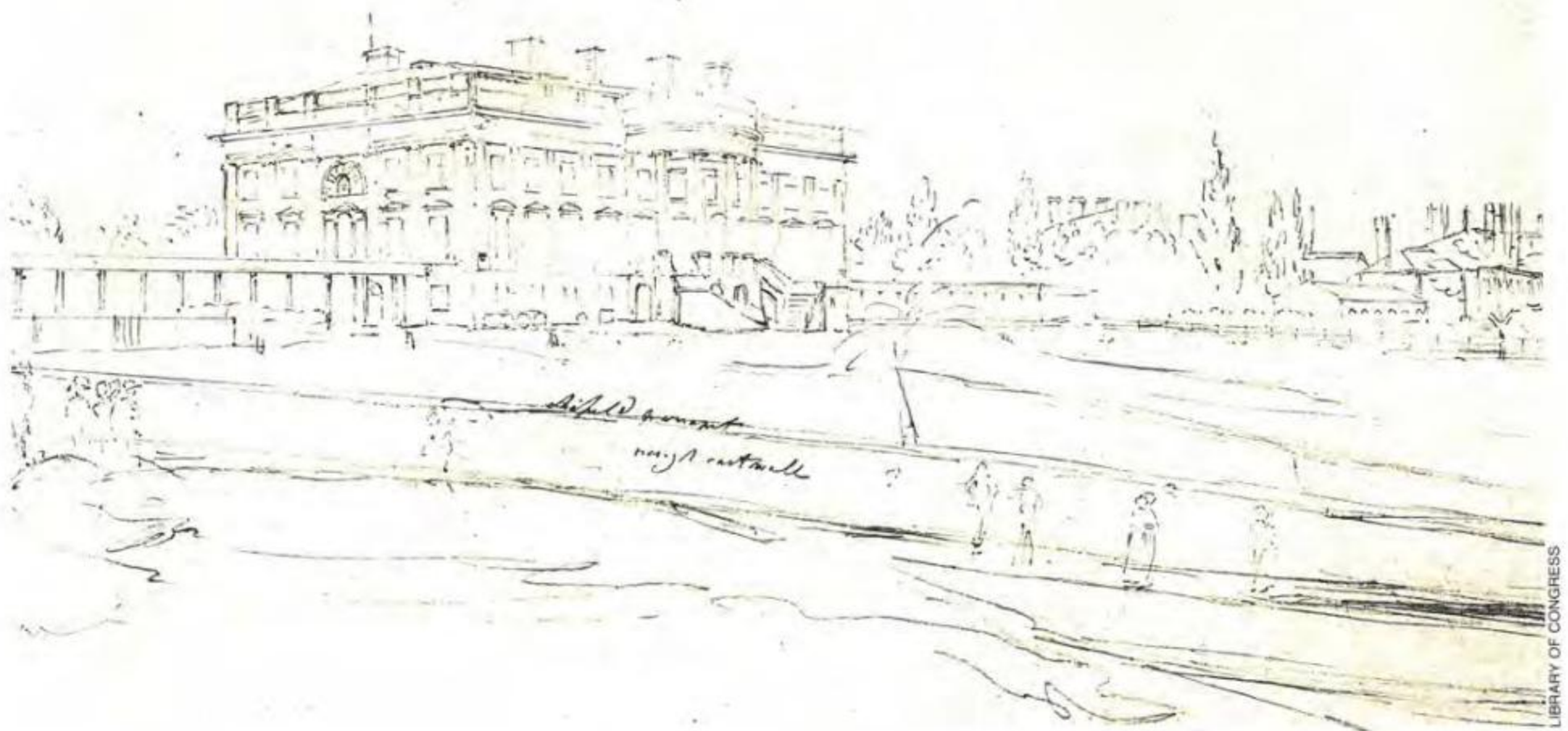
When President John Adams arrived in Washington to move into the White House in November 1800, there were no separate service structures except for simple brick stables two blocks away; the grounds held only workers' sheds. It was up to him and Mrs. Adams to make the unfinished brick and stone interior shell habitable. The basement, containing work and chamber spaces for cooks, housekeepers, and servants, probably seemed more cozy and finished than the principal rooms above. Adams's addition to the house consisted of rickety wooden stairs to a scabbed-on wooden balcony that gave the public unintended access to the south entrance of the house. When Jefferson replaced John Adams as president in 1801, he quietly slipped into a shell of a house still reeking of fresh plaster. His creative design propensities must have been stoked as never before.

### White House Remodeling

Thomas Jefferson never resided in any house very long without altering it to suit his ever-developing taste for comfort and convenience. The incomplete interior of the White House presented him with a remodeling opportunity he had already practiced in Williamsburg, Paris, New York, and Philadelphia.<sup>4</sup> This practice on landlords' houses later paid dividends when he remodeled Monticello, constructed his idealistic villa retreat Poplar Forest in Bedford County, Virginia, and eventually created his largest work, the University of Virginia in Charlottesville.<sup>5</sup> While his remodeling skill bore mostly unrealized fruit in his interior plans for the White House, the two service wings he added established an important link to his three most personal projects and represent an enduring experiment in architecture.

Probably even before Jefferson took up residence in the White House, his creative mind whirled with ideas of how to tweak the large Georgian pile. What he had been given as a starting point was a house of generous size with domestic services confined to the basement story and flanking government buildings about





500 feet to the east and west. The mostly barren shell vacated by John and Abigail Adams was a *tabula rasa*, as were the grounds around the house, facilitating the amateur architect's fertile imagination to produce remodeling solutions to the former and initial plans for the latter.

To Jefferson's dismay, domestic necessities such as shelters for fowl, goats, and cows had begun to supplant the workers' shanties that had sprung up around the house during construction. Jefferson found other needs wanting. The stables were two blocks distant; guests and servants shared an exterior privy; keeping ice was difficult without an ice house; the basement offered inadequate storage for wood and coal; and other functions such as a hen house and smokehouse were needed and best placed outside the basement. Jefferson's solution to put these functions in wings developed from his use of attached Palladian-style service wings at Monticello. To accomplish this would take time, congressional budget approval, and a capable construction superintendent. The latter job fell to Benjamin Henry Latrobe as surveyor of the public buildings and his assistant John Lenthall.<sup>6</sup>

3. *Drawing of the White House from the southwest by John Rubens Smith, c. 1833, omitting details on the west, foreground, but showing the reuse of portions of the east wing for grounds purposes.*

Jefferson had corresponded with Latrobe since 1798, most likely meeting him in Philadelphia about that time, and had first hired him in 1802 to study the Tiber Creek Canal between the White House and the Capitol and then to design a dry dock for the fledgling U.S. Navy on the Anacostia River at the base of Capitol Hill. Having confirmed Latrobe's skills as the most accomplished, and arguably the only, professional architect and engineer in America, Jefferson hired him in March 1803 as surveyor of the public buildings, a position he held until 1811.

Latrobe's initial task at the White House was to replace a leaking roof of slate embedded in mortar and gutters that were letting buckets of water into the house, threatening to destroy the few newly installed architec-



tural finishes. Jefferson also called upon Latrobe to fix the two new water closets on the Second Floor that were fed from rain-collecting cisterns in the attic. Jefferson redesigned the grand, but unbuilt, west staircase that Latrobe would construct off-axis in order to open the vista and public access to the terrace promenade once there was a wing built to support it. A similar glass door was retrofitted in the similar eastern Serliana or Venetian window for east wing terrace access. Jefferson's other interior plans to fashion a French three-room chamber and study suite on the First Floor were never accomplished but are shown on plans by Latrobe.<sup>7</sup> What Jefferson focused on and pursued to at least partial completion were the domestic service or "office" wings and their intended connection to the flanking federal buildings.

Jefferson began remodeling with the easiest, yet important, projects related to convenience and service: replacing the outdoor privy with two indoor water closets from Philadelphia; establishing a cooled wine cellar; hanging service bells throughout the house; upgrading the kitchen for his French chef by installing stew stoves, boilers, and ranges; and having the unsightly and dangerous south stairs removed in favor of a bridge-like entrance on the north side of the house, which had been intended for public access. Jefferson did keep Adams's scabbed-on wooden balcony as a temporary outdoor room from which to view the distant Potomac basin's wilderness, quickly disappearing beyond the already denuded White House grounds. Later he could enjoy the outdoors on his own terraces, but the view would remain less than scenic.

### **The Domestic Service Wings**

Jefferson's solution to the deficiencies of the White House came from his own house rather than from the sophisticated Paris town houses where he resided in the 1780s. His plan drawing of c. 1804 shows what he wanted (illustrations 16, 17). These drawings were first published by the architect and architectural historian Fiske Kimball in *Thomas Jefferson, Architect* (1916), a monumental work that established Jefferson as an accomplished self-trained architect in addition to his myriad other capabilities. Onto each side of the White House he proposed attached service wings, commonly called "offices." These wings, partially set into the grade on their north or public side, would expand east

and west as needed, or as funded, until they joined the Treasury Department building on the east and the War Department building on the west (illustration 15). The common thread visibly connecting these segments on the south would be a Tuscan order colonnade that provided a covered walkway. Jefferson's drawing also shows a 100 foot section of parallel wings to the south of the main block at the east and west ends, intended for government clerks' offices for the Treasury and War Departments, to which they connected. Latrobe's advocacy of fireproof construction influenced Jefferson to designate the extremities of the wings, opposite the span of proposed clerks' offices, for fireproof storage rooms for each department. This lateral expansion to each side of the White House served to visibly connect the three existing federal buildings in an American way, stretched out horizontally in the wide-open space.<sup>8</sup> The grouping of services in these wings left the large, ungraded expanse south of the house for Jefferson's private landscape mixture of formal and picturesque features (illustrations 11, 12).

Kimball's book also depicted Monticello's prototypical north and south colonnaded wings. The difference in function between these and the White House wings had to do with what was already housed in the basements and the scope and function of each house. The common denominator was service. Monticello's daily routine and its economy depended upon enslaved servants. Jefferson's preference at the White House was for paid servants.<sup>9</sup> Monticello's wings captured most of the economic and domestic functions of a large Virginia plantation that ordinarily existed as separate buildings arranged hierarchically in the surrounding and distant landscape. Jefferson's imitation of Palladio's domestic service wings reserved the surrounding grounds for picturesque pleasure gardens as well as making the linked and covered buildings convenient.

The White House wing plans can be scaled for size because of a drafting convention Jefferson learned in Paris. The famous antiquarian architect Charles-Louis Clérissieu taught Jefferson the architectural drafting advantages of using pencil on carpetmakers' point paper. Jefferson thereafter used this ruled graph paper (which became standard for architects in the twentieth century) as a visible scale in architectural drawing. The paper consisted of a grid of large red lines containing ten small squares between them. Typically, for



Jefferson, each small square equaled 1 foot. Thus this “decimal” paper required no scale rule or written dimensions for understanding scaled size. By scaling Jefferson’s White House wing plan with this method, one can see that he is placing the intended columns on 10 foot centers with door and window openings centered between them. The interior room wall divisions are also centered on the columns, with some larger rooms necessarily being a double or a multiple of the 10 foot module. The first sections of the wings, separated 20 feet from the main house wall, were meant to be 24 feet wide and 150 feet long. The plan shows partially penciled walls, indicating the subsequent extension to the adjacent federal buildings and the parallel row of clerks’ offices. Jefferson’s precision on the graph paper can be seen in the thickness of the brick walls dividing each room, which are shown to be about 6 inches less than two squares, or about 18 inches, being the standard size of a 2 wythe thick wall using standard 8½ inch long handmade brick with a mortar joint of about ½ inch.<sup>10</sup> In this scaled method, the room sizes are as follows: on the west the wine cellar was 18 feet in diameter, the wood room with coal cellar, 8 feet wide; the necessary, 9 feet; the saddle room, 8½ feet; the servant’s room 18 feet; and the coach house 58 feet. On the east the meat house with vault below was 13½ feet; the cellar stairs, 3½ feet; the necessary, 8 feet; the servant’s room, 18 feet; the hen house, 18 feet; and the stables, 58 feet.

Jefferson’s first addition was neither in the house nor in the wings but an exterior ice house constructed just west of the house in 1801. Some functions might wait, but those related to the quality of food and drink could not! This 18 foot round by 16 foot deep structure was not unlike the ice house constructed as part of the north wing at Monticello in 1802. Jefferson’s memorandum book notes that he paid for filling the White House ice house in 1802 and for carpentry work by John Lennox the same year.<sup>11</sup> The work by Lennox could be for any or all of the tasks of constructing the ice house roof, for an internal platform, or for an enclosure that appeared by 1803. The ice house was then joined to the west side of the basement level by what must have been a simple frame structure that also served to shelter the preexisting well just west of the house.

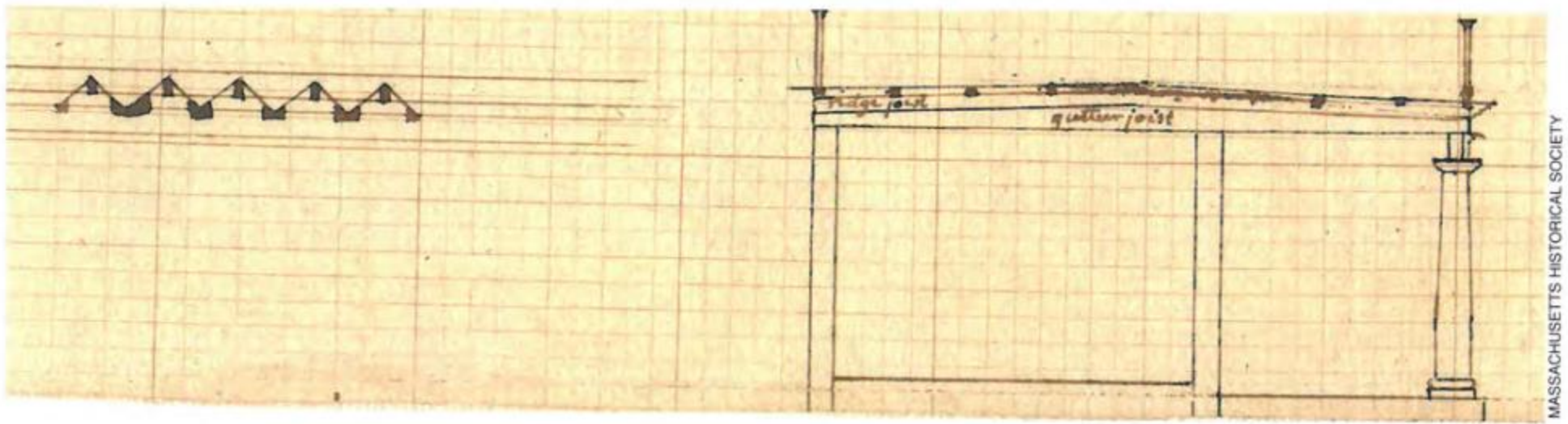
This was more than simply an ice house, however. Having no deep cellars in the basement posed a problem for keeping expensive drink at cool temperatures.

Apparently the subject became one of anecdote, as Sir Augustus John Foster mentioned in his travel memoir that the ice house–wine cellar had been occasioned after President Jefferson experienced “great losses in wine” from inadequate storage in the basement.<sup>12</sup> Latrobe also gossiped of Jefferson’s losses when, in a letter to William Lee, he shared his opinion that, due to the absence of an original underground cellar, “Mr. Jefferson lost 800 bottles of Crab cider for want of one” and that “a good provision [for a] cider and beer cellar never existed in the house.”<sup>13</sup> To prevent further loss of precious liquors, Jefferson had a platform fitted out inside the ice house as a sort of wine cellar room that had impressed Foster enough to remark on its temperature relative to the heat outside. Latrobe lamented that “the wine cellar in the West wing is fit for nothing but wine” but that the “present kitchen will admirably supply the deficiency [for beer and cider].”<sup>14</sup>

Digging for the west wing began in the summer of 1804 under the direction of architect and engineer Latrobe and his assistant and construction supervisor Lenthall, the same team working on the Capitol construction under Jefferson’s supervision. Jefferson had chosen the right man to undertake the most complex of American building projects. While the completion of the Capitol and the President’s House was his primary responsibility, Latrobe found that he first needed to supervise emergency rebuilding on both buildings.<sup>15</sup> He had promptly engaged builder John Lenthall as his assistant, beginning an interesting correspondence among the three regarding both building projects, with Lenthall serving as an outlet for Latrobe’s frequent frustrations with the architect-president.

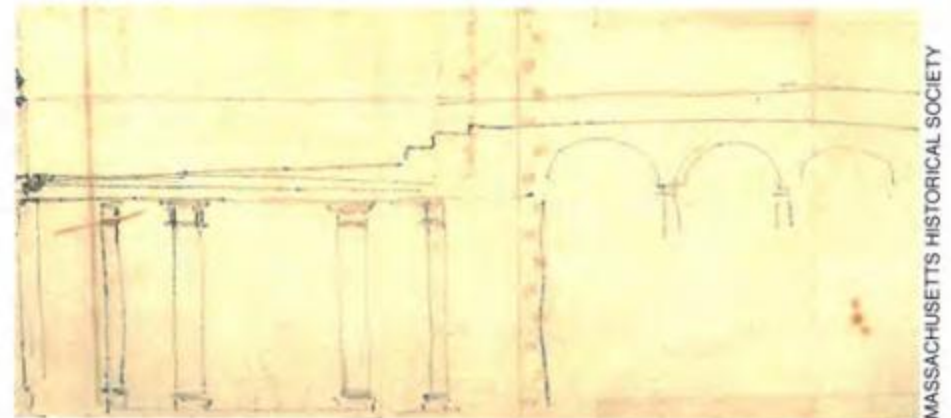
Latrobe and Jefferson found themselves intellectual and architectural soul mates of a sort, while Latrobe and Lenthall bonded over details of building construction. In the beginning, at least, Latrobe was taken with Jefferson, writing home to his wife after a White House dinner in 1802: “It is a long time since I have been present at so elegant a mental treat. Literature, wit, and a little business, with a great deal of miscellaneous remarks on agriculture and building, filled every minute. There is a degree of ease in Mr. Jefferson’s company that every one seems to feel and to enjoy.”<sup>16</sup> The honeymoon would soon be over, however, when Jefferson’s architectural ideas and taste clashed with Latrobe’s over certain building concepts and construction details.





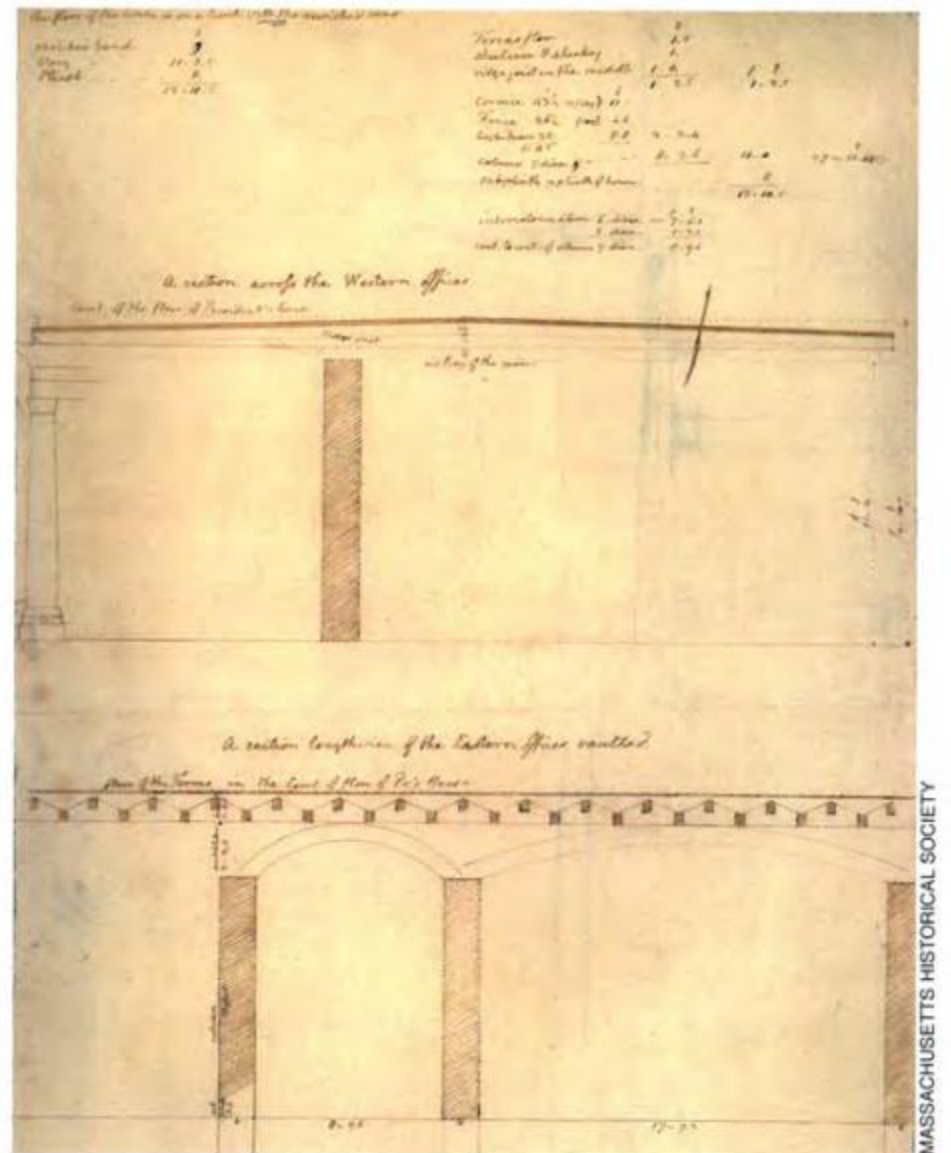
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4. Above: Thomas Jefferson's sketch of the terrace roof. Jefferson's preliminary sketch of the wing shows the innovative roof system he was developing for a number of his projects. His indication of "gutter joist" and "ridge joist" would become his signature technique for compressing a watertight roof system while allowing for a strolling deck above.



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5. Above, right: Jefferson dictated a challenge to Benjamin Latrobe that the east wing should not vary in height although its roof deck next to the White House was lower in elevation than the Treasury Department to which it would connect. Latrobe's sketch indicates that the height difference would be hidden by a low solid parapet wall.



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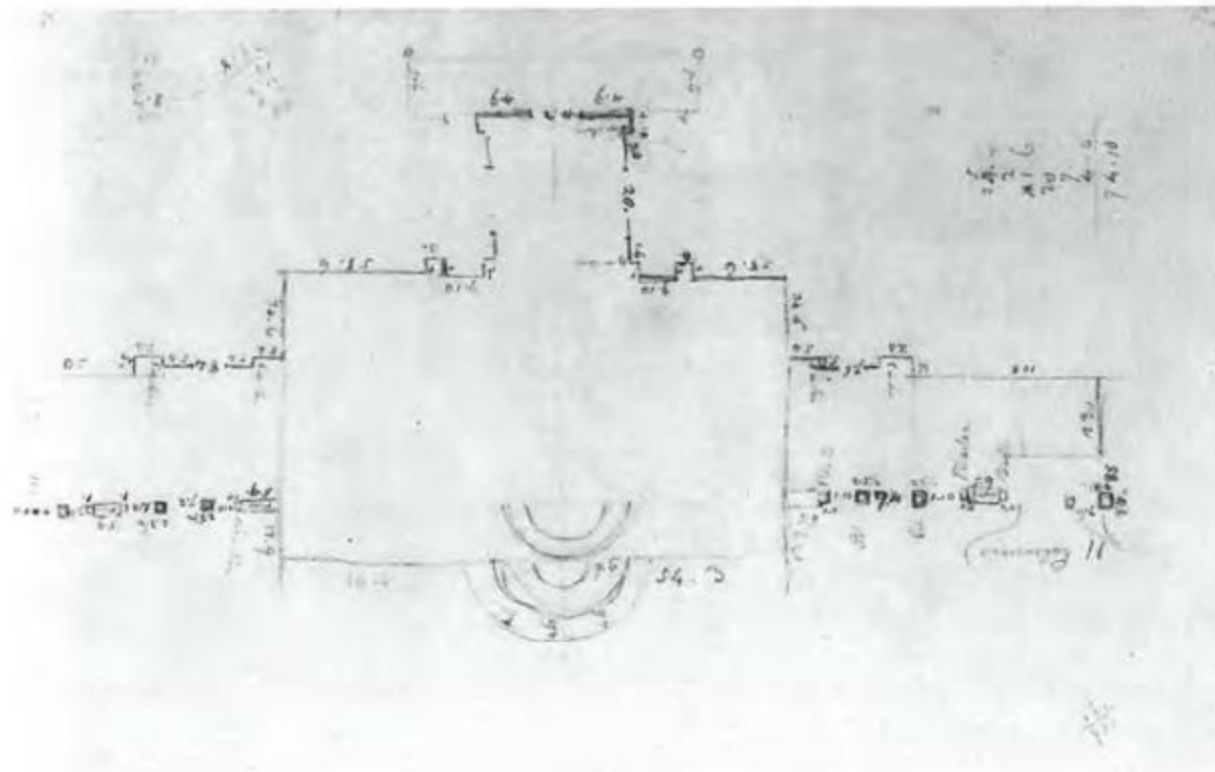




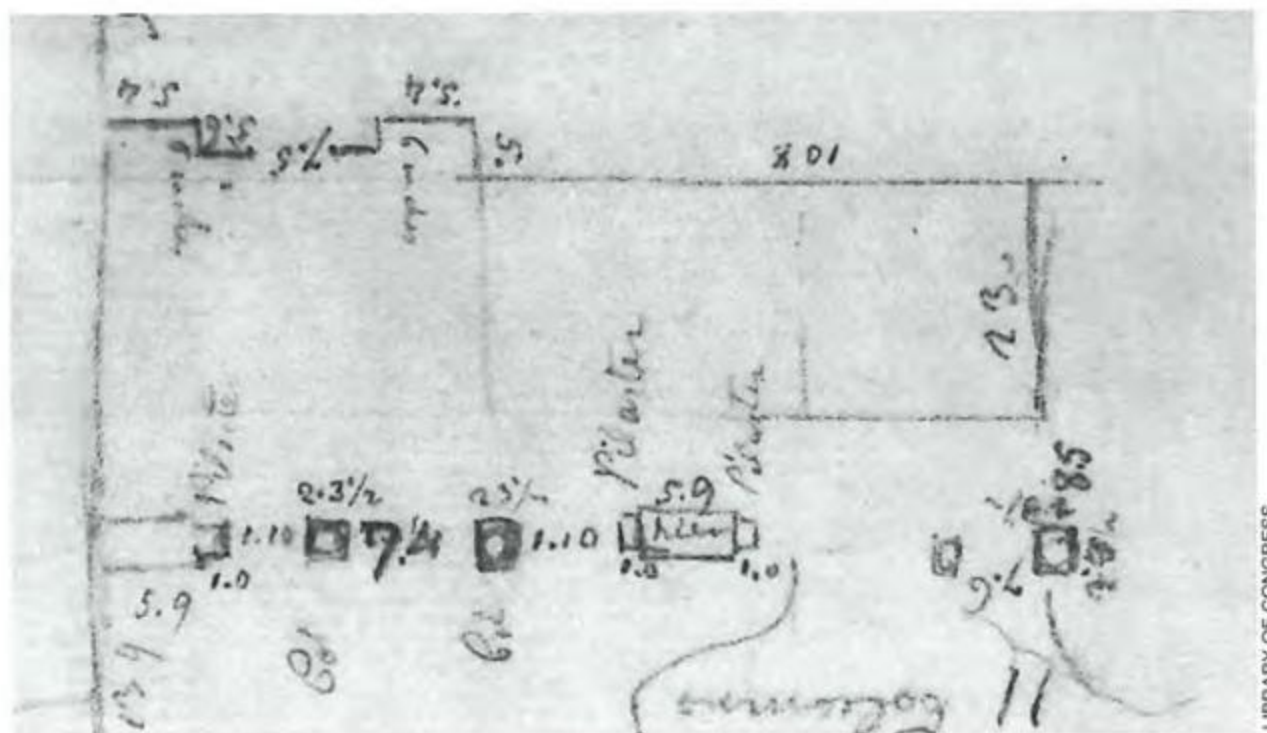
7. Far left: Jefferson's notes and drawing for his ice house at Monticello are the best indication for how he designed the contemporary ice house at the White House.

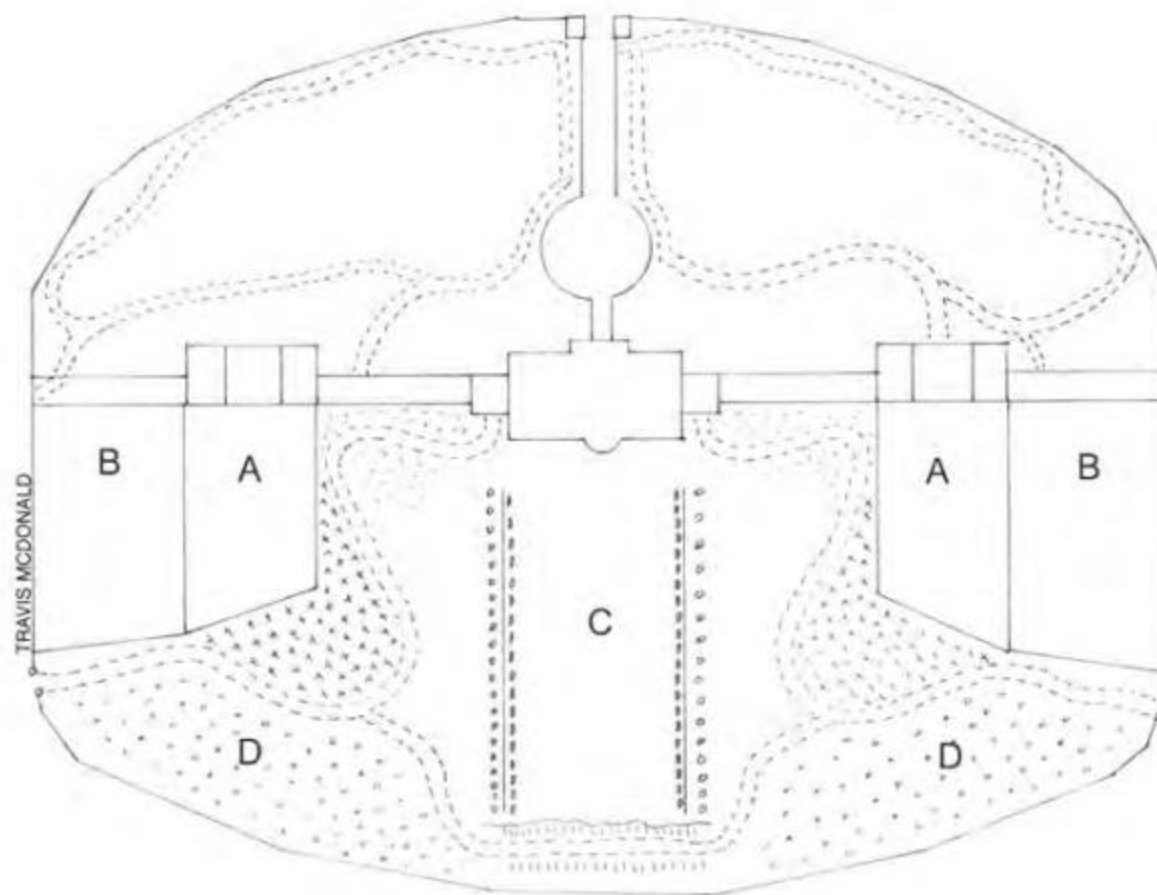
8. Left: President Jefferson and his surveyor of the public buildings, Benjamin Latrobe, exchanged many ideas and drawings for constructing the White House wings.

9. This sketched outline plan of the White House and wings, c. 1807–8, is most likely from Latrobe's office and indicates the actual dimensions of what existed. It shows the west wing in its first segment and a longer east wing with its addition.



10. Latrobe's sketch illustrates how he proposed terminating Jefferson's colonnade adjacent to the house. By creating piers and columns in antis, Latrobe conceived a more elegant solution.





Latrobe B H May 21 07

I have little doubt that the S.W. quarter will cost as much as the three others, & consequently that our money laid out on them will go three times as far as laid out on that. were they for 2000 I think it would matter little at that end of the cost as before but different as we know them to be. I have thought it best to change the order of the work. its ultimate objects will still be the same.

The distance between the two & meeting offices being about 1200 feet, I have thought we should leave 100 ft. to each office as a yard, and take 1000 ft. for the house. on the North & South sides the walls may be bounded by the streets. the shape of the ground will thus



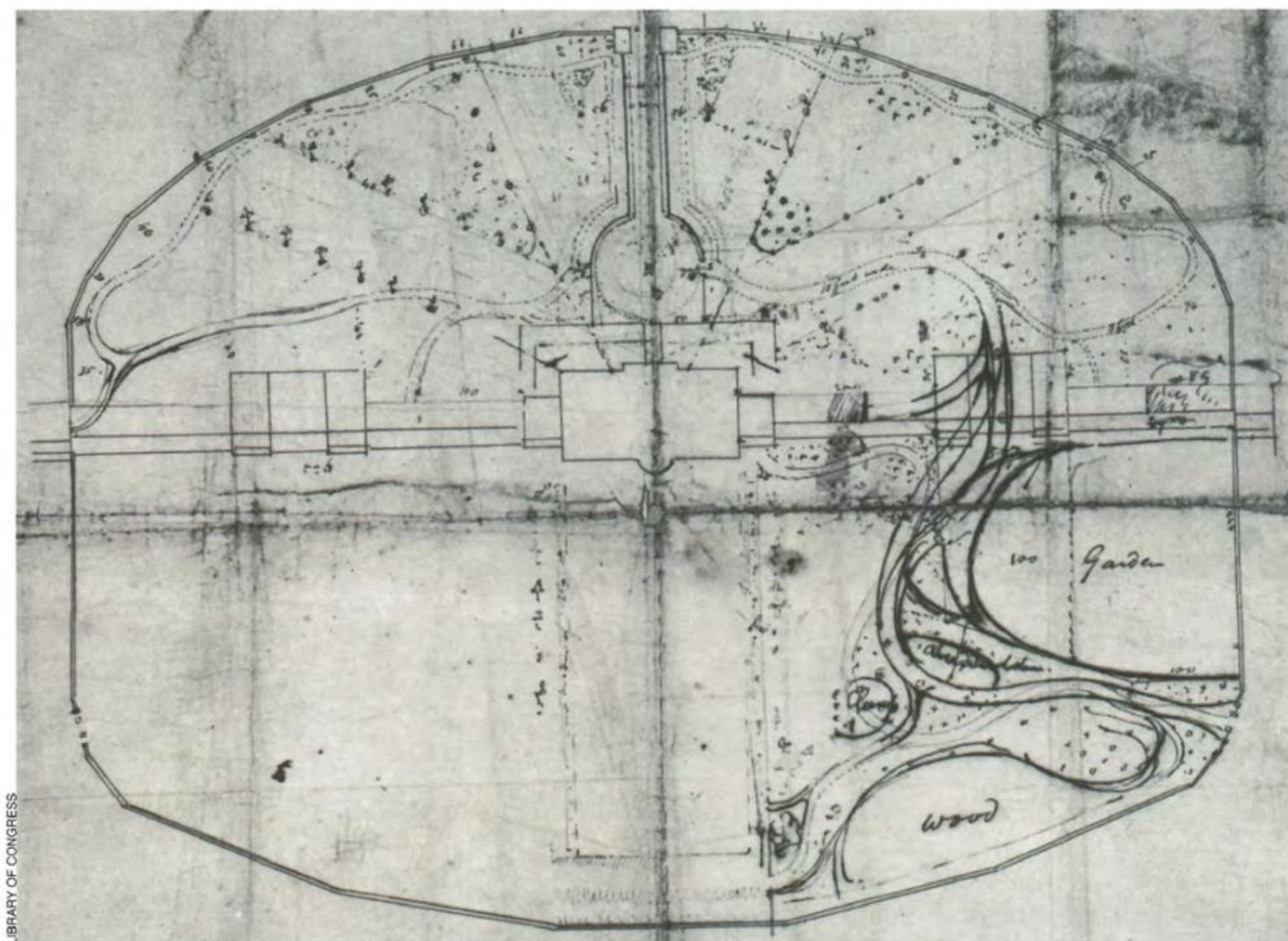
one - on each side of your glass for the Capitol? it seems to be the only thing that could disappoint our hope of having the Represen-  
-tative chamber ready. I salute you with esteem & respect

Th Jefferson

11. Above: This conjectural landscape for the South Grounds combines Jefferson's utilitarian idea of vegetable gardens (B) and a middle pavilion coach house service yard (A) with picturesque paths and plantings (D) and a more formal lawn planted with trees, flowers, and shrubs (C). This sketch is taken from the lightly drawn central and southeast quadrant design on the collaborative site plan that probably indicates Jefferson's initial ideas. The symmetry assumed for the southwest quadrant is conjectural. Although not realized at the White House, Jefferson's central design in this plan was the prototype for his landscape at his retirement retreat Poplar Forest.

12. Left: Jefferson's sketch in this letter reveals that the majority of ground would be reserved for a decorative landscape.

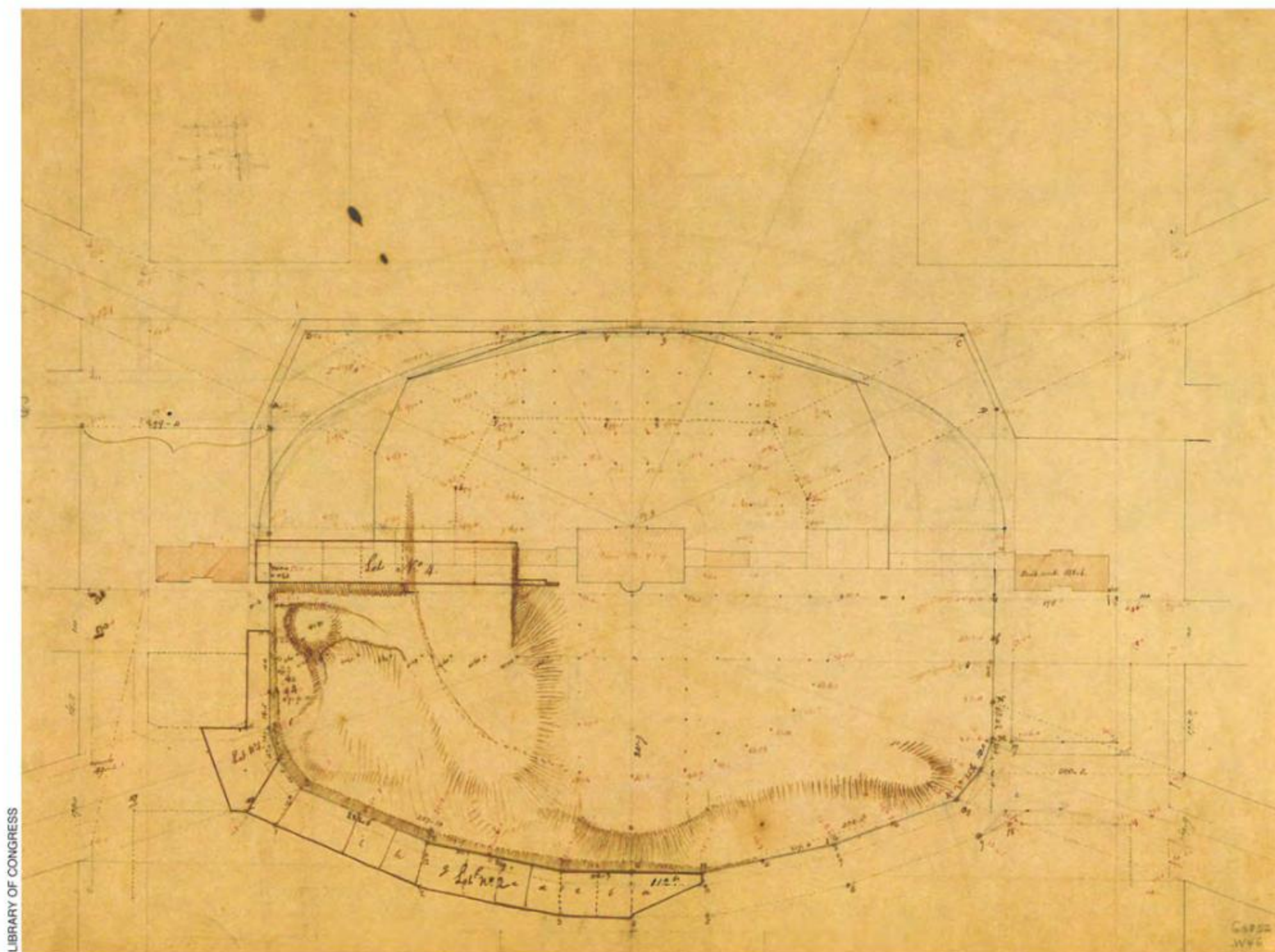




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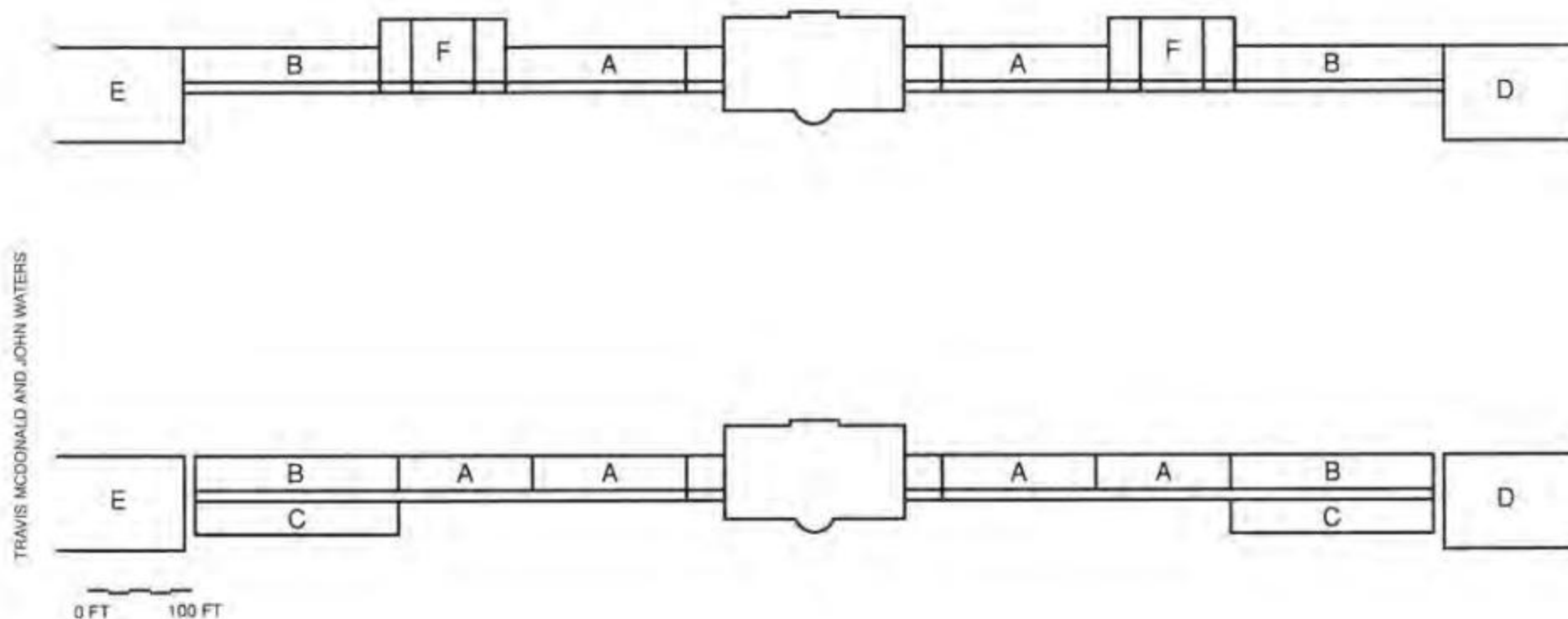
13. This landscape plan, c. 1805, can be considered a collaborative site plan consisting of Jefferson's initial ideas and Latrobe's suggestions. The collaboration is true both for the wings, with Latrobe's suggested central pavilions, and in the landscape with Latrobe's ideas sketched in a darker, more self-confident overlay in the southeast quadrant. The southwest quadrant was not regraded at the time of the sketch.





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14. In this plan both the natural topography and the intended excavation to accommodate the extended west wing are depicted. A faint pencil line showing a curved path, along with the falling grade at the end of the middle lawn, indicate that Jefferson proposed to use the natural topography to lay out his paths and landscape, as seen on the collaborative site plan (illustration 13). The natural grade shown on the southwest would also support a symmetrical plan, as indicated in the conjectural site design.



15. *Jefferson's initial scheme for the extended wings, seen on the lower plan, called for extended domestic service wings (A) ending in a double range of government clerks' offices (B,C) that served the adjacent Treasury Department (D) on the east and the War Department (E) on the west. As seen in the upper plan, Latrobe suggested middle pavilion coach houses (F) that would allow for horses or carriages to pass through the range of building from north to south.*



Construction of the White House wings in 1805 marked the beginning of a restrained and testy relationship between Latrobe and Jefferson. Responding to Jefferson's early concern for a seamless height and connection of the wings from the White House to the Treasury and War Department buildings, Latrobe wrote, "I find many difficulties in the arrangement of the connecting porticos of the public offices with the President's houses which however I do not despair of conquering."<sup>17</sup> Still, Latrobe found that this collaboration of his own architectural taste and reason with Jefferson's as "damned hard work" and confessed, "I have bestowed much labor upon them [designs for the wings] already, and find myself exceedingly puzzled how to determine the exact mode of accommodating the two ends of the wing between the President's house and the Treasury to each other so as to answer the object of each in the best manner."<sup>18</sup>

In a letter to Lenthall, Latrobe complained of the difficulty of aligning the east wing deck level with the flanking Treasury fireproof wing at a higher grade level. Latrobe lashed out in frustration and famously remarked: "I am sorry that I am cramped in this design by his [Jefferson's] prejudices in favor of the old French books, out of which he fishes everything, but it is a small sacrifice to my personal attachment to him to humor him, and the less so, because the style of the Colonnade he proposes is exactly coincident with Hoban's Pile,—a litter of pigs worthy of the great Sow it surrounds, and of the Irish boar, the father of her."<sup>19</sup> When Latrobe accidentally addressed the letter to Jefferson, Jefferson returned it stating he had not read it. Latrobe then wrote, somewhat embarrassed, to Lenthall: "The president, might have very safely read the whole of my last letter to you, even to the litter of pigs. He is certainly one of the best hearted men that ever came out of the hand of Nature and has one of the best heads too."<sup>20</sup> An indication that Jefferson actually did read Latrobe's reference to "old French books" is a letter Jefferson wrote in 1807 asking Latrobe for the return of his Kraft and Ransonnette book on the mansions of Paris, saying: "Being about to build some little temples in my grounds at Monticello, I must pray the return of the Plans des Maisons des Paris . . . as I expect to find some good designs in that."<sup>21</sup> In other words, Jefferson planned a fishing expedition in new (1801) French books.

The first portion of wings, east and west, appeared by the end of 1805 under Lenthall's supervision. When Latrobe submitted the surveyor's annual report on the public buildings to the president and Congress, part 3 of that report addressed the White House: "At the President's House two small buildings have been erected, containing some of those domestic offices without which that building could not conveniently be inhabited. They contain a meathouse, cellars for liquors, coal and wood, and privies, and are intended to be faced to the South by a covered passage, or colonnade. Further menial offices, and some of them of the first necessity, are still wanted, before the dwelling of the President of the United States will be provided with all those domestic accommodations which are required by most private citizens."<sup>22</sup>

### Evidence for the Design of the Wings

Were these first sections of the White House wings, with later "menial" and subsequent sections, constructed according to Jefferson's original plan? Did Latrobe influence changes to what Jefferson designed and intended? Did President James Monroe and the architect James Hoban alter the original design after the 1814 fire? This article is the first to seriously address these questions. To decipher the answers, a rather detailed account must be given to support an interpretation that stands on the variety of sources. The best answer to all of these questions requires some historical sleuthing based on the analysis of different sets of relevant evidence: Jefferson's c. 1804 drawing of the intended wings; drawings and written references to the wings during construction; Hoban's account of rebuilding the wings in 1817; the earliest known post-Jefferson wing plan drawing, by the architect Thomas U. Walter from 1853; and illustrations and photographs from the nineteenth and twentieth centuries, especially photographs of White House renovation projects from 1969. The myriad sources and types of evidence are not always in perfect corroboration, but they have been assembled and reassembled to test all the possible hypotheses and present the case that is best supported.<sup>23</sup>

Correspondence among Jefferson, Latrobe, and Lenthall implies that Jefferson's initial design was stubbornly adhered to despite Latrobe's personal preferences. One of many lengthy letters indicates that Latrobe worked from Jefferson's design but was produc-



ing working drawings, more or less in accord with Jefferson's drawing, for Lenthall's use. Latrobe wrote Lenthall during the initial season of building:

As to the president's calculations of his coal cellars, pray don't plague yourself about them, nor about the necessary. You have my ground plan; let that be your guide & of what consequence is it, whether there be a foot or two more or less for coals or *dung* provided there be the room enough. Now the president's 20 feet, are two spaces of 10 feet, whereas my two spaces make only 19'6"—& my are produced by the actual division of the spaces allotted for the Colonnade into equal parts & his are assumption near the truth and as to the door & windows, it is also only of consequence whether they fall centrally into the intercolumniations or not, but of none at all whether they fall symmetrically internally.<sup>24</sup>

Latrobe considered his own drawings the more accurate ones for Lenthall to follow while reconciling Jefferson's ideal design regularity to the reality of wall thicknesses and the practical space in each room. Walter's plan, subsequent plans, and what is still standing of the west wing confirm that exterior appearance and style did matter. Door and window openings were centered between each Tuscan column on the south (the columns did not come until 1808) and between the evenly spaced lunette windows on the north. That this design trumped internal room division walls is at the heart of the matter for understanding changes. Latrobe's mention of rooms 10 feet wide does not match the surviving Jefferson plan and indicates either some missing updated drawings by Jefferson or some tweaking by Latrobe.

The 1805 report to Congress describes the first wing segments as "two small buildings" containing a "meathouse, cellars for liquors, coal and wood, and privies" (illustrations 27, 28). Taken at face value, according to Jefferson's plan, this description would include three spaces on each side: ice house, coal and wood room, and privy on the west; and meat house with vault, stairway, and privy on the east. Latrobe's working drawings for the wings are not known to survive, and the later physical evolution of the wings makes it is hard to confirm this arrangement and size except for the first room on the west. Key to distinguishing between

Jefferson's intentions and Latrobe and Lenthall's construction is Walter's 1853 wing plan, the second oldest known after Jefferson's (illustrations 16, 17).

While it offers a distant comparative view in time, we know that President James Madison was determined to rebuild the house and wings as they were before the fire, a symbolic gesture that also implied the already iconic nature of the house. Hoban left a pretty good description of the extent of the main house's standing walls but not of the wings. The wing's masonry walls, partially in-ground, might have withstood substantial destruction just like those of the basement. The Walter plan thus serves as one verifiable measure in addition to other evidence when determining the original room usage and size for the east and west wings.

On the west the subterranean ice house became reenclosed in brick as part of the west wing in 1805. It constitutes the "room" and contained the wine cellar space referred to in the report to Congress as "cellar for liquors."<sup>25</sup> The proposed Walter plan substantiates the ice house use and location in 1853, since its survival was structurally assured and its function easily reactivated after the fire.

In Jefferson's plan next came the wood room with a coal cellar below. The period use of the term "cellar" did not necessarily mean a below-grade room but could denote any type of storage room or space. In this case, however, the Jefferson drawing labels this space "coal below, wood above." What it does not indicate is how servants accessed the piles of Virginia Midlothian coal.<sup>26</sup> What seems odd on the Jefferson plan is the narrowness of the wood room and coal cellar, scaled to be about 8 feet wide. It is here that a reference in the above mentioned letter from Latrobe to Lenthall makes sense. Latrobe complained about the president's "calculations of his coal cellars" and that a few inches difference in size for the cellars, be they for "coals or *dung*," did not matter. This reference seems to be linked to the one that immediately followed, referring to two spaces of 10 feet each. Jefferson apparently increased the size of the second room to 10 feet wide, a width that still worked with the exterior openings and made the adjacent necessary 10 feet wide. The lingering question is how anyone reached the below-grade cellar. The Walter plan shows a much larger second room of about 20 feet wide, the combination of Jefferson's two rooms, that in later plans is still labeled as wood and coal storage.



Jefferson's third space, the necessary or privy, Seale indicates was for servants on this side whereas the east privy would be reserved for the family and guests.<sup>27</sup> At 10 feet wide it might have been divided into two stalls but, one or two, was probably still "unisex," as per the custom. Latrobe's reference to cellars for "coal or dung," mentioned in relationship to rooms 10 feet wide, seems to confirm a combined cellar space for the coal cellar and privy waste removal. This combination works only for the west wing, but it does not resolve the question of access. A fourth room is unidentified and was probably used by servants.

A surviving drawing helps establish the size of the initial west wing (illustration 9). This drawing shows someone taking measurements of the existing house and wings. If it is related to working out the dimensions of Latrobe's design of a pilaster and pier, it would date to 1807 or 1808. The west wing length given in this drawing is 50 feet.<sup>28</sup> This size accommodates five window or door bays and accounts for all three of the Jefferson designated spaces as well as an extra space on the end. On the Jefferson plan that fourth space is labeled "saddle room," but at this period there were no stables in the west wing. Walter's plan shows a necessary of about 12 feet wide, divided into two stalls with seats, but placed to the west of Jefferson's necessary.

What complicates a reconciliation of the Jefferson and Walter plans is the odd fenestration shown in 1853. While we can expect the room division walls to vary from the regularity of the exterior features, four blind windows shown on Walter's west wing plan for the first five bays produce an awkward collision with internal walls. It is here that other sources help sort out the contradictory evidence. These include a period drawing, personal and official correspondence, and physical evidence shown in photographs.

Latrobe drew a beautiful south elevation of the White House showing a proposed portico (illustration 18). It also shows four bays of the east and west wings at that time. On the west is pictured: a lunette window on the ice house wall; a doorway with typical lunette window above, another doorway, and a window. This fenestration would seem to support the Jefferson room plan and sequence of an ice house, a wood room, and a necessary.

Another piece of evidence is an unlikely photograph taken on November 28, 1969, by a White House

photographer documenting three men digging out the west end of the west wing for Richard Nixon's new Press Room (illustration 22). The men are working below grade in a Piranesi-like view amid piles of dirt and fragments of masonry structures. While far from a suitable documentary recording of architectural evidence, this photograph sadly provides our known universe of physical evidence from which to interpret and test hypotheses of the initial west wing room plan.

The photograph clearly shows a round brick outline of the ice house, the wing room most substantiated. By using the window and door bays as markers, it is possible to place the "ghosts" on the upper walls and the below-grade remains in a proper context despite the photograph's warped perspective. On the right, the south wall, can be seen the first lunette window bay adjacent to the ice house, with a later doorway below it. To the right of that bay is the "ghost" of a missing wall that separated the ice house from room two. The second bay shows the sill of a doorway accessing the wood room that was later filled with brick. The third bay is shown as a doorway that would have accessed the necessary. These three bays confirm Latrobe's elevation and the Jefferson plan. The evidence would seem to confirm the Walter plan's depiction showing a window in bay two.

On the north side (left side of photograph) the ice house wall "ghost" is visible to the right, and continuing below window bay two. This defines the wall between the ice house and the wood room, whose walls are shown on the Walter plan as recessed for the original window and door to open into the room. On the wall to the right of window bay three (upper left foreground), and below to the right of the mason, is evidence of the missing wall between the wood room and the privy. This same wall also appears on the right side of the photograph in the foreground just below and east of the doorway (due to the perspective of the photograph things do not seem to align if the opening bays are not used as reference). This wall also establishes the eastern wall of room three, the necessary, whose full extent cannot be seen in the photograph. These walls for the original rooms two and three prove that the larger room shown in the Walter plan was created out of two earlier rooms. To the left of the mason is a lower brick wall that seems to be directly under the third window bay,



with an arch springing from it.

In addition to showing five later period doorways, there are three things of interest in the photograph. First, at the far wall, the eastern end of the wing, a large masonry arch has been filled in. This arch presumably carried the weight of the wing's eastern brick end wall above the ice house that protruded beyond it at a lower level. Constructed first, the ice house was covered by a wooden roof structure that was demolished when the wing was constructed, leaving the protruding wall that needed to be captured in the squared brick wing walls. The ice house might have been identical to that Jefferson constructed at Monticello at the same time, with a wooden roof structure below the level of the wing roof.<sup>29</sup> The original arch extended just to the south (right in the photograph) of the later doorway that was inserted in the filled wall when the ice house ceased to function.

Because the ice house is off-center to the north in the wing, there is room on its south side under the arch for space containing a stairway to be squeezed between the curved ice house wall and the south exterior wall. This is the most likely place for a narrow stairway accessing the cellar space below rooms two and three, and making sense of a cellar for "coals or *dung*." Jefferson's drawing hints at this arrangement by showing a south doorway in bay one, although with no indication of stairs.<sup>30</sup> The Walter plan does not show any access or stairs but simply a solid mass of masonry in this location.<sup>31</sup> The only reasonable access to cellars below would be a narrow stair space defining a third room, like that shown on the east wing plan, but nothing supports this scenario.

Finally, one perplexing bit of evidence in the photograph is the remains of two arches on the north side shown on either side of the mason. It would be reasonable to think that Jefferson might have created vaulted spaces for the coal cellar and/or a necessary clean-out. However, a letter from Latrobe seems to rule out this possibility. Latrobe remarked to Jefferson: "I regret that your Coal cellars were not arched. I have seen so much rotten timber in every building erected in Washington, that my passion to exclude it altogether grows upon me daily."<sup>32</sup> The arches could have been added in the 1818 rebuilding to help support the combined spaces of rooms two and three for wood and coal storage. There is no means of a lower-level access in Walter's plan, so the

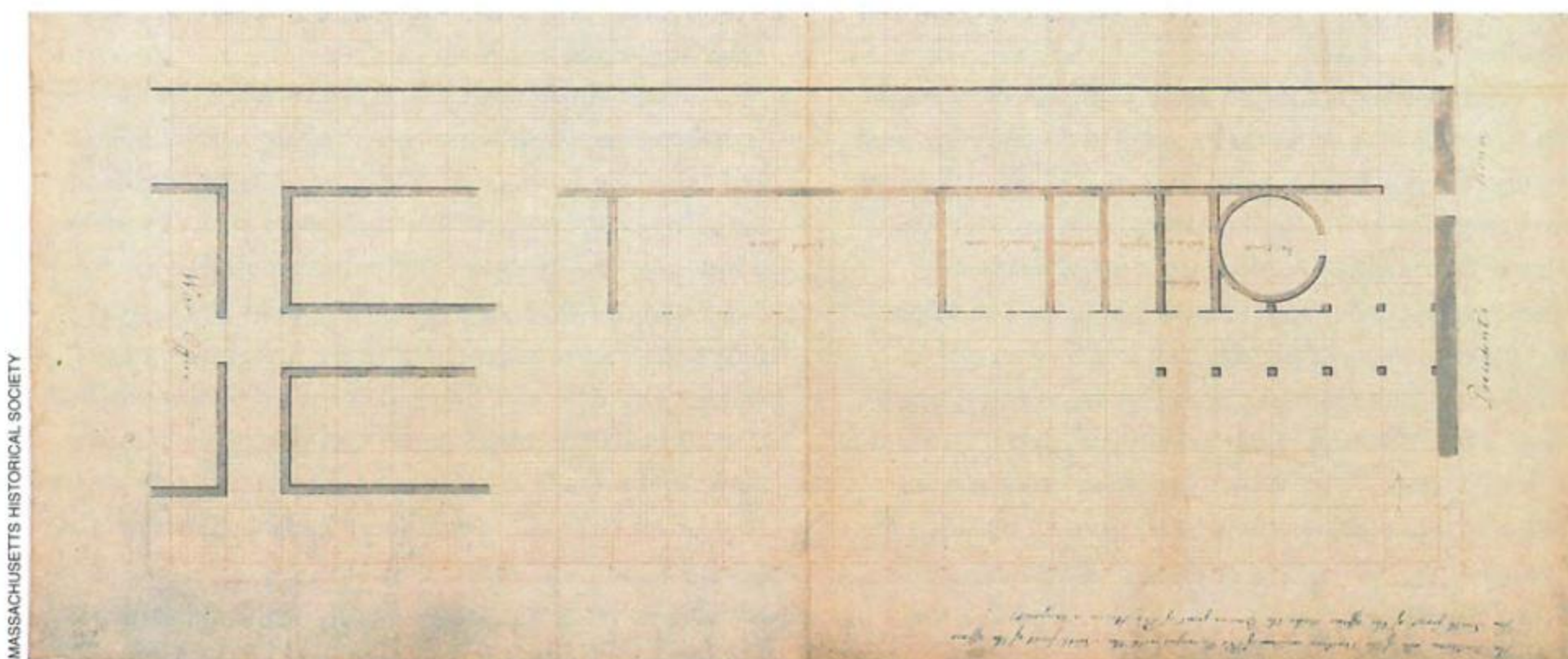
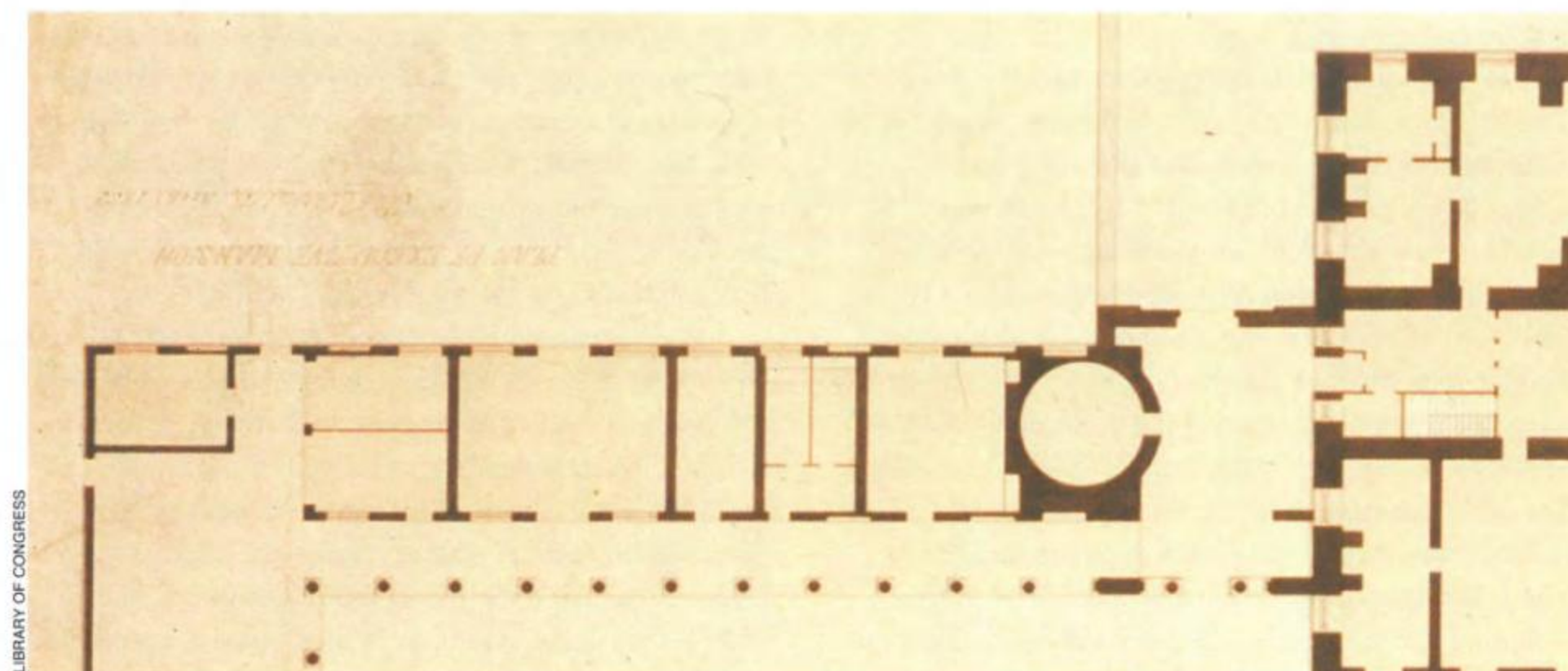
arches would not be for the necessary, which must have been cleaned from the space itself.<sup>33</sup> The other possibility is that the arches are relieving arches for the north wall, allowing the "Coal cellars" to extend beyond the wall into the higher north grade. As such, they would not have fit Latrobe's definition of an arched floor like that designated for the meat house's vaulted floor.

For the east wing a comparison of the Jefferson and Walter plans can be made, but the photographic and physical evidence is lacking due to that wing's demolition in 1866. Jefferson's plan calls for room one to be "Meat house above, Vault below," room two as "Descent into cellar" stairway, and room three as "Necessary." All three functions are mentioned in the 1805 report. What is seen on Walter's plan is consistent with Jefferson's room use and sequence but shows the rearranging of internal room walls to achieve a larger meat house and necessary.

"Meat house" was a term contemporary with "smokehouse," a structure where meats were smoked and salted for curing and then usually suspended from the rafters until needed. The difference with this meat house, due to Jefferson's flat terrace roof above, was that it did not have the typical tall pyramidal peaked roof wherein the hams cured in the upper reaches of smoke. Did this meat house contain only hams smoked elsewhere? Two clues suggest that fires were actually made in the space. The "Vault below" refers to a masonry vault of brick. This would not be necessary for constructing the floor above a cellar or for creating a ceiling above a cellar space, but it would be necessary if the floor structure needed to be fireproof for a fireplace or firepit in the room. The other possible clue to smoke being present is that the Walter plan shows a possible opening for ventilation on the west wall of this space facing the exterior passage between wing and house.

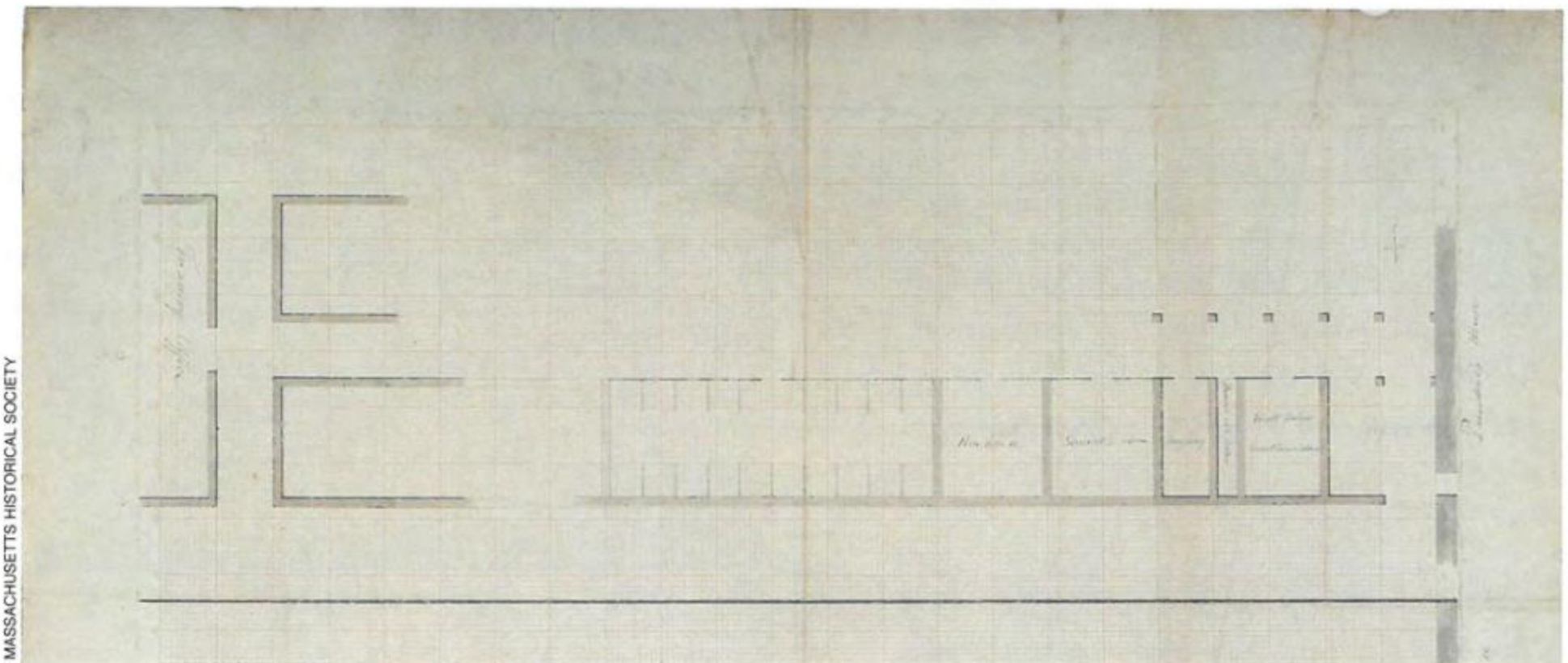
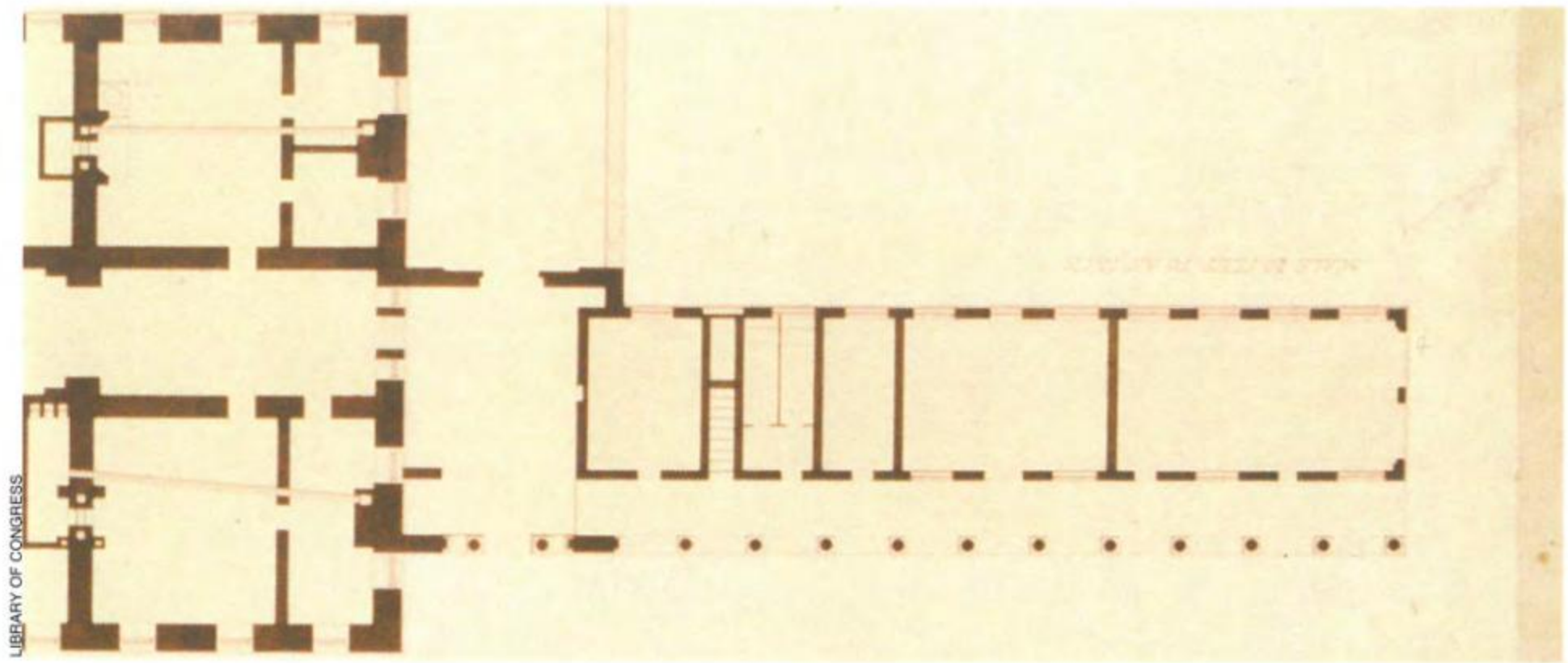
In two other applications where Jefferson created a low ceiling smokehouse under a terrace deck roof—Monticello and Poplar Forest—there was no apparent exit for smoke other than what seeped through the roof or deck.<sup>34</sup> The vault was not necessary for a fireproof floor since typical smokehouses had floors of dirt or brick. The vault not only made for a fireproof floor but created a cellar space below, as the stairway indicates. What the cellar was used for is unknown, although the proximity might indicate that it could have housed wood for the fires above. The possibility that the fireplace





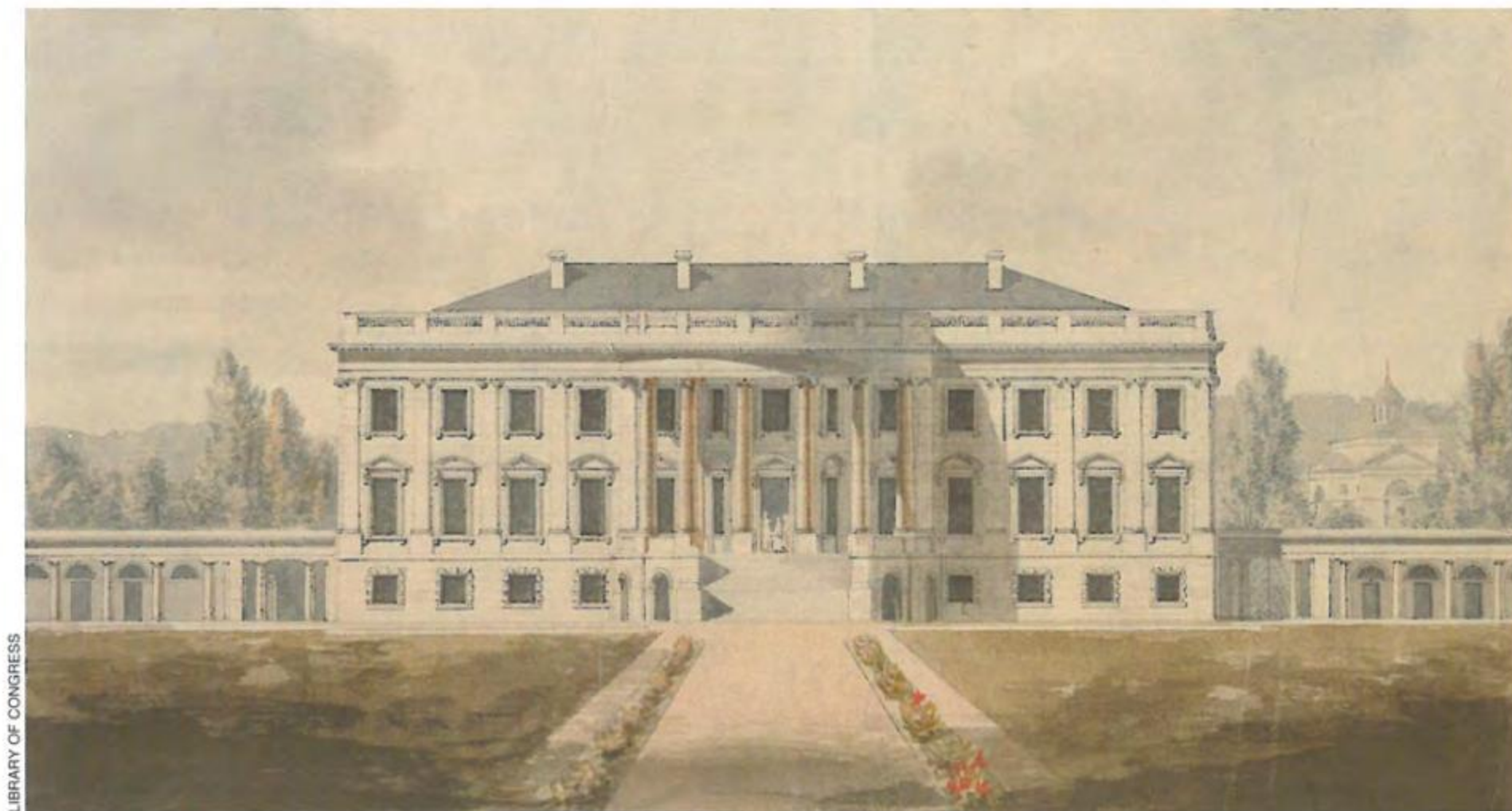
16. The lower plan, c. 1804, depicts Jefferson's initial intention for the west wing, showing the ice house that was constructed before the wing. The upper plan is Thomas U. Walter's drawing from 1853, the earliest known wing plan after Jefferson's and one that reflects the rebuilding after the 1814 fire and subsequent alterations.





17. The lower plan, c. 1804, depicts Jefferson's initial intention for the east wing, showing steps that accessed a below-grade cellar under the smokehouse. The upper plan is Walter's 1853 wing drawing reflecting the 1818 rebuilding and any subsequent changes.





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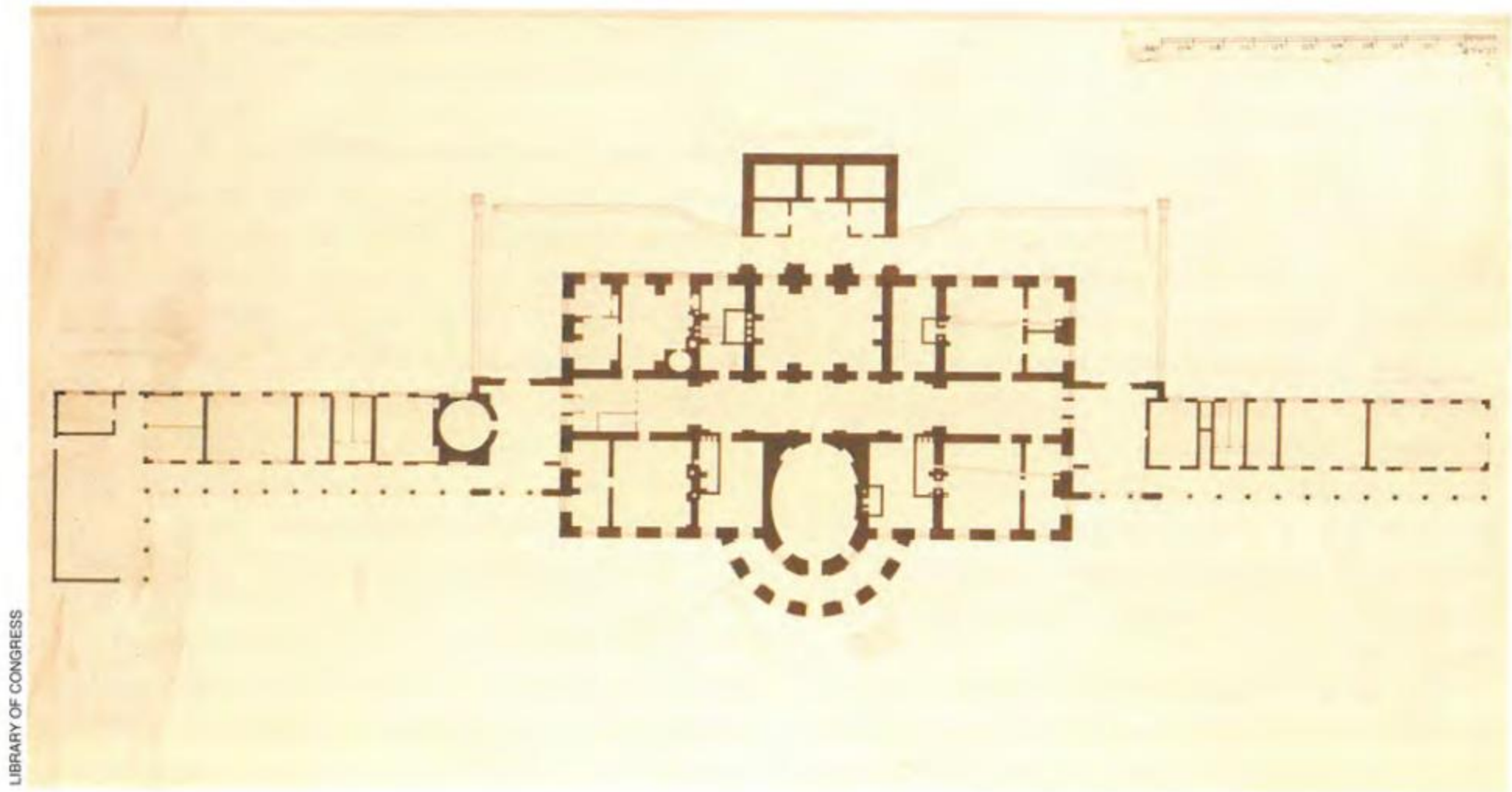
18. Above: Latrobe's "Elevation of the South front of the President's house, copied from the design as proposed to be altered in 1817" shows the first four bays on the east and west wings, lending credence that the Jefferson plan, at least in the first constructed portions, was faithful to his drawing.

19. Right: Latrobe's perspective drawing of the White House hand-dated to 1811 but showing the west wing as it appeared before 1809.

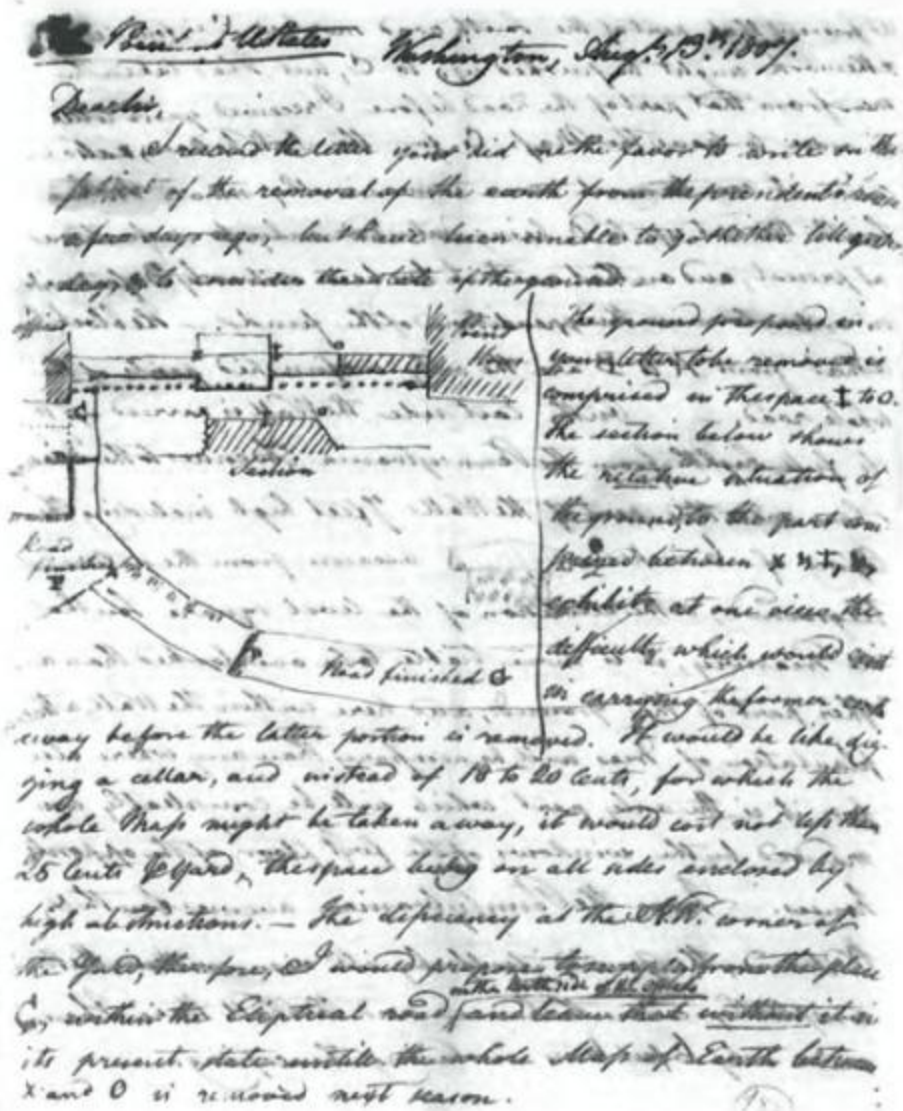


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20. Above: Walter's plan of 1853 is the earliest known plan of the White House basement level and wings. It reflects both faithfully reconstructed Jefferson plans following the fire of 1814 and some changes in the west wing.

21. Left: In a letter to Jefferson, Latrobe sketched the current landscape projects in 1807. The earth was too high for the extension of the west wing and needed to be excavated. The South Grounds were also being enclosed by an irregular semicircular stone wall.



was located below the space seems to be negated by Jefferson's use of the word "cellar," which implies storage. The stairway, constituting the second room space, in addition to accessing the "cellar below," could also have accessed the underside of the necessary where waste could be removed. Its window most certainly would have been used originally for light, as opposed to the blind window shown on the Walter plan.

The third space on Jefferson's east plan was the "Necessary" that, enlarged to 10 feet wide, might have accommodated two separate stalls for bench seats as shown in the Walter plan. Typically, Jefferson put louvers in his privy window openings for ventilation, but unfortunately his plan does not show windows and the Walter plan does not distinguish anything different in this opening.

In summary, it seems Jefferson stuck to his original plan but allowed for larger spaces (illustrations 27, 28). The first section of the west wing ended up as a five bay section, 50 feet long. The east was first a four bay section, 50 feet long. This arrangement seems to be confirmed by the fact that in 1805 Jefferson mentioned that he wanted to extend the east wing by 60 feet and in 1807 mentioned extending the west wing 50 feet, giving each by 1809 their 100 foot lengths.<sup>35</sup> On the east this extension was accomplished in two sections: a stable space was added in 1806, and a carriage house was added to the end in 1809. The west wing did not get its matched extension until 1818.

### The Roof Structure

The innovative significance of Jefferson's service wings lies in their roof structure. To create his flat terrace—or what he called "terras"—roof deck or walking platform, Jefferson had experimented at Monticello with several ways to compress the roof structure by altering the ceiling joists of the rooms below. The roof needed to act in a typical manner to keep out water while giving support to the deck and rising to a minimal height, typically behind the entablature trim. It was important that the deck level be at the same level as the floor of the house from which one stepped.<sup>36</sup>

Jefferson might have seen versions of flat roofs and terrace decks in Europe, where masonry "platform" roofs were more common, but his documented evolution of experimenting with different methods leads to the conclusion that he did invent his ultimate "terras" roof-deck

construction.<sup>37</sup> Latrobe, who certainly knew European construction methods, called it the "President's zig zag roof of sheet iron uniting all the good qualities of the pantile, without its bad ones."<sup>38</sup> Latrobe had more than a passing interest in sheet iron for roofs, because he was partners with Samuel Mifflin in the first iron rolling mill in the United States and claimed to have been the first to use sheet iron for roof coverings.<sup>39</sup> Latrobe and Mifflin were providing sheet iron for Monticello in 1803 at the same time that they were busily producing it for both the White House and the Capitol. At the White House the iron was needed for a hasty retrofit to replace the leaking slate roof and gutters of Hoban's roof.

Jefferson had ultimately settled on a compressed series of high and low ceiling joists for his wings that he called the ridge and gutter joists (illustrations 4, 5, 6). By spanning the closely spaced high and low joists with two layers of shingles, he created a miniature shingle roof that was hidden underneath the deck and at the same time acted as its support. If sheet iron was used, wide horizontal boards would be used to span the joists. Rain water fell through the cracks between deck boards to the sloped shingles or tin-covered boards below, where it was directed into the scooped-out wooden gutter joists that were pitched outward to carry it, by gravity, to one or both sides. In some instances the water was directed into cisterns, and at other times it fell out to the ground through scuppers in the entablature.<sup>40</sup> At the White House, hidden gutters directed water to tin pipes that ran down the outside of the room walls and from there it probably fed into cisterns in the basement, just as the main roof gutters delivered water into attic cisterns that fed the interior water closets. As Latrobe put it to Lenthall, "[There are] cross gutters inside the [wing] wall, into which all the others piss, as you say."<sup>41</sup>

The Achilles' heel of this system was the wooden gutter under the deck that stayed dark and damp and rotted. Jefferson solved this problem by using some sheet iron intended for the Capitol. Folded sheet iron was placed over the wooden ridges that overlapped, like a pantile roof, with inverted folded sheets in the gutters. Jefferson's "terras" roof drawing for the White House shows a V-shaped gutter to accommodate the sheet metal.<sup>42</sup> The terrace deck above required a wooden cap on top of the ridge in order to hold and secure the perpendicular sleepers to which the deck boards would rest and fasten. Even with sheet iron covering the wood, the



same longevity problem existed: the thin sheets of rolled iron could not be tinned like smaller sizes and had to be continually painted to be preserved.

The fixed deck not only kept air and sun out but also prevented maintenance, causing the iron sheet metal to rust or uncovered wood gutter joists to rot. Jefferson apparently first saw a similar use of sheet iron at General Samuel Smith's modern house, Montebello, outside of Baltimore. In a letter to Latrobe in 1803, Jefferson asked him to stop to see the house with its flat roof that used iron sheet metal in gutters, being "the first and only example yet executed." Jefferson asked Latrobe to examine it so that "it may furnish us, by the manner of its execution, information both as to what succeeds, and as to what may not succeed, and therefore is to be avoided, if anything about it does not succeed."<sup>43</sup>

There is no known further correspondence on the matter, but Jefferson proceeded with the sheet iron, and in fact had already ordered the material for Monticello's roof. While he used sheet metal for gutters at the White House and later at the University of Virginia, he came to acknowledge its failure. Concerning a similar "terras" deck and zigzag roof on the 1815 service wing at Poplar Forest, Jefferson remarked that sheet iron was expensive (when not at federal expense) and lasted no longer than the thick wooden gutter joists, which at Poplar Forest was only ten years.<sup>44</sup> At Poplar Forest wood shingles spanned the high and low joists and directed rain water into the wooden gutters and out through scuppers in the entablature, where it fell to the ground.<sup>45</sup> Using sheathing boards covering with sheet iron rather than wooden shingles saved a great amount of labor. A surviving wing roof shingle found at Poplar Forest shows that they were not typical shingles but were specially made. Each pine shingle—and there were about nine thousand for a 100 foot long roof—had to be planed on four sides, cut with beveled tops and bottoms, and incised with two parallel ¼ inch grooves on their faces to facilitate downward movement of water. The labor, it must be remembered, on Jefferson's own projects at Monticello and Poplar Forest, was slave labor. At the University of Virginia in the 1820s, with state money, Jefferson experimented with even more versions of this system over the student rooms on The Lawn, sometimes with wood shingles and at other times with sheet metal in the gutter joists.<sup>46</sup>

The sheet metal used in the White House roof gutters probably lasted until the British torched the place in

1814, but another typical type of failure before that prevented President James Madison from strolling or sitting on the deck as Jefferson had. Latrobe wrote Madison in 1812 that the "platforms covering the gutters were rotten and must be replaced."<sup>47</sup> This message must have chagrined Madison, who had adopted one of Jefferson's zigzag roof systems to create decks over the 1809 wings at his Montpelier. Whether they were replaced at the White House, or not, is hardly relevant because they would be burned in two years. When the wings were rebuilt by James Hoban in 1818, the roofs were copper. Whether Hoban constructed the roof structure with Jefferson's joist system or simply constructed a low pitch rafter roof is unknown.

### The Terrace Deck and Coach Houses

On April 22, 1805, Jefferson wrote to Latrobe with the request that his drawings of the wings be returned and asking for Latrobe's comments so that the "offices" could begin.<sup>48</sup> About that time Latrobe wrote to his brother and mentioned two of his projects: "I shall this Year build wings to the president's house *of his own design* (he is an excellent architect out of books by the bye, but loves the taste of Queen Elizabeth best), [and will build] additions to the Treasury offices."<sup>49</sup> Just prior to sending a long critique of Jefferson's "*own design*" along with his ideas, Latrobe confided in Lenthall that "neither my taste nor my reason could at first be made to yield acquiescence" to the architect-president.<sup>50</sup> In addition to a design improvement of terminating the colonnades with piers and pilasters rather than columns, Latrobe addressed two major issues: the difficulty of reconciling the wing roof deck height from the White House to the Treasury building on the eastern terminus, and the recommendation that the long 500 foot stretch of eventual service buildings on each side of the house needed to be broken up in the middle by a stables or coach house pavilion. The pavilion, he reasoned, would allow for more convenient north-south horse and carriage access, instead of going around the long wings. At the same time the messy stable yard could be accommodated farther away from the house. Further, the repetitive colonnade, Latrobe pointed out, allowed insufficient room for carriages to pass through.

Jefferson replied to Latrobe's suggestions stating that the piers and pilasters were fine and that the pavilions were along the lines of his own thinking, but the



terrace deck level was not negotiable: "Nothing can be admitted short of the terras of the offices from the President's House to the pavilions each way being absolutely in the level of the *floor* of the house. How it shall drop off from the last Pavilion to the Treasury, and gain from the West one to the War office is the difficulty of the art which will be worthy of you to conquer."<sup>51</sup> Jefferson evidently felt very strongly on this point because when he directed construction of the 100 foot service wing at Poplar Forest, he adamantly stated the deck should be "in the level of the floor of the house."<sup>52</sup> Jefferson's stubborn reply was later echoed in a Latrobe letter over the debate of whether real stone or rough cast (stucco) was appropriate on the north side of the wing. Latrobe wrote to Lenthall: "The back front [north] of the presidents buildings must absolutely be in ashler, let him manage the south as he will; I shall oppose rough cast on the north side tooth and nail, at the Treasury end, where *I* am master [it will be ashler]."<sup>53</sup> Latrobe's pencil sketch shows how he intended to accommodate the wing levels through an intermediate terrace deck level next to the house that gained height once over the wings proper with a low solid balustrade added to mask the difference (illustration 5). He also sketched a pier and pilaster design for any interruptions or terminations of the colonnades (illustration 10). Otherwise, Latrobe faithfully carried out the ridge and gutter system sketched by Jefferson (illustrations 4, 6).

The visual clue to what Latrobe proposed as the "middle pavilion" is seen on a collaborative site plan drawing c. 1805 that evidently merged Jefferson's design for wings and landscape with Latrobe's counter-design with middle pavilions (illustration 13). The pencil drawing might have been the work of Jefferson's architecture student Robert Mills, who was working in Latrobe's office, with heavier ink overlays by Latrobe.<sup>54</sup> The pavilions are shown as wing segments cut up, turned perpendicular, and pulled apart with a generous pass-through space in between. They project north from the wing wall 35 feet, and each side bay is 35 feet wide.<sup>55</sup> The center portion is a carriage passage that, at a very generous 60 feet wide, would have spanned the different heights of north and south with a pitched and paved surface. Altogether the structure was 70 by 130 feet, a rather large building. At a later date, after 1806 by the indication of the east wing's extension and the appearance of the Treasury fireproof, Latrobe's hand is

seen in the heavy overlay lines on the drawing that directs a major roadway from the north through this opening southeast toward his Pennsylvania Avenue gateway.<sup>56</sup>

It is worth quoting a good portion of Jefferson's reply to Latrobe's critique and design suggestions, as it reveals the detailed level of Jefferson's involvement as well as his polite reminder of who was in charge:

That the coach house cannot permanently remain where I have planned it, is certain because of the inconvenient distance a carriage would have to go from the South to the North front when the whole line of offices shall be closed. The upper floor of the Middle pavilions, level with the surface of the ground on the North side, and opening on it, must ultimately be destined for coachhouses. But I want a coach house immediately and hope we may the next year add 60 f. to this year's work which may be conveniently used as a coach house, while the rest of the line is unclosed, and may be converted to any other use, when further calls for accommodations shall render it necessary to build as far as the center pavilions. The obstructions to the colonnade from the stables, may be prevented by giving them a North door, as horses will easily ascend or descend the terras on the North side. But the most difficult of all is the adjustment of the new connecting building to the different levels of the three existing buildings. Nothing can be admitted short of the terras of the offices from the Pres.'s House to the pavilions each way being absolutely level of the *floor* of the house. How it shall drop off from the last Pavilion to the Treasury, and gain from the West one to the War office is the difficulty of the art which will be worthy of you to conquer. The depression of the Treasury floor favors eminently the giving the necessary height to the Treasury offices now to be built. By the bye, I observe in the drawings for the Treasury offices in mr. Gallatin's hands, that the barrel of the vault runs lengthwise of the building, to wit, from East to West. I thought that you had concluded it would be better for them to run across the building from N. to S. so as to press against each other, and rest on piers or partition walls. These would take little from the internal room as they would serve to place presses



against, and this arrangement would give large South windows; not indeed material for the Treasury offices now to be executed, but indispensable for those hereafter in which the officers and clerks will write. They will want doors too opening into the colonnade. My opinion is that in time they will want a double row of offices, as in my sketch given you, the passage between which will range with the colonnade. These suggestions are for your consideration; but your presence here for a few days is indispensable to consult and determine ultimately on the plans. In the mean time the digging is going on, and Mr. Lenthall found that the excellent rough building stone here is cheaper than brick in the proportion of 3, to 5. It is certainly as durable, and either of them being to be rough cast, it ought to be preferred, because it enables us to do more with our appropriated sum in the proportion of 5, to 3, which is a great matter.<sup>57</sup>

This letter informs us of a number of important issues respecting the immediate and continuing construction of the wings. Whatever he had contemplated (and we must take him at his word that he had), Jefferson accepted Latrobe's idea for distant middle pavilion coach houses and stables. Jefferson threw Latrobe another challenge. Making the pavilion's upper floor level with the north grade would pose yet another grade-building height to conquer, especially with a steeper grade for horses and carriages. At the same time Jefferson affirmed what he had drawn in his wing plan, that the stables and coach house would be closer to the house, even if temporary. Latrobe raised a good question when asking how carriages and horses would exit through the southern colonnade. For the present it was a mute question given the short sections of wings, but Jefferson's solution to the colonnade problem was simply to put a north door in the stables where the horses could "easily ascend or descend the terras on the North side." Jefferson's adamant statement about keeping the terrace deck level regardless of the change in grade reveals the sovereignty of Jefferson's "terras," for it connected architecture, landscape, and nature. The letter also confirms Jefferson's idea for using a parallel row of clerk's offices, the fact that he had sent Latrobe sketches, the frustration with Latrobe working long distance from Delaware, and the debate over using good stone versus cheaper stone covered with rough cast.

Jefferson's response to Latrobe's critique contains the first mention of a wing extension. Jefferson wanted an immediate extension for a coach house 60 feet long with a north doorway for horses. He acknowledged that this was temporary and when eventually the coach house would be located farther away in the pavilion, the wing space can "be converted to any other use."<sup>58</sup> The congressional report of 1806, however, mentions that a stable, rather than a coach house, was added on the east and that a coach house was still needed.<sup>59</sup> If this first addition, a stable, is defined on the 1853 Walter plan by the three bay room in the center of the east wing, the center opening on the north side indicates the doorway mentioned by Jefferson as the solution to north-south access (illustration 17).

Jefferson's west wing expansion had to await a considerable grade change (illustration 21). The "temporary stable" had been "added under the colonnade" on the east side (illustration 27). "Under the colonnade" had now become the catch phrase for "temporary," holding out hopes of some grand central pavilion.<sup>61</sup> The east wing grew again with a temporary coach house extension in 1809 under President Madison. The access problem through the intended colonnade, mentioned by Latrobe, was solved by two large carriage openings forming the east end of the wing and shown on the Walter plan. This temporary solution, due to the incomplete wing row, is also confirmed on the collaborative site plan showing Latrobe's bold marks leading a carriage drive from the north public grounds directly into the end of the east wing. While servants might have occupied the extended wing as Jefferson indicated, his "hen house" was forgotten.

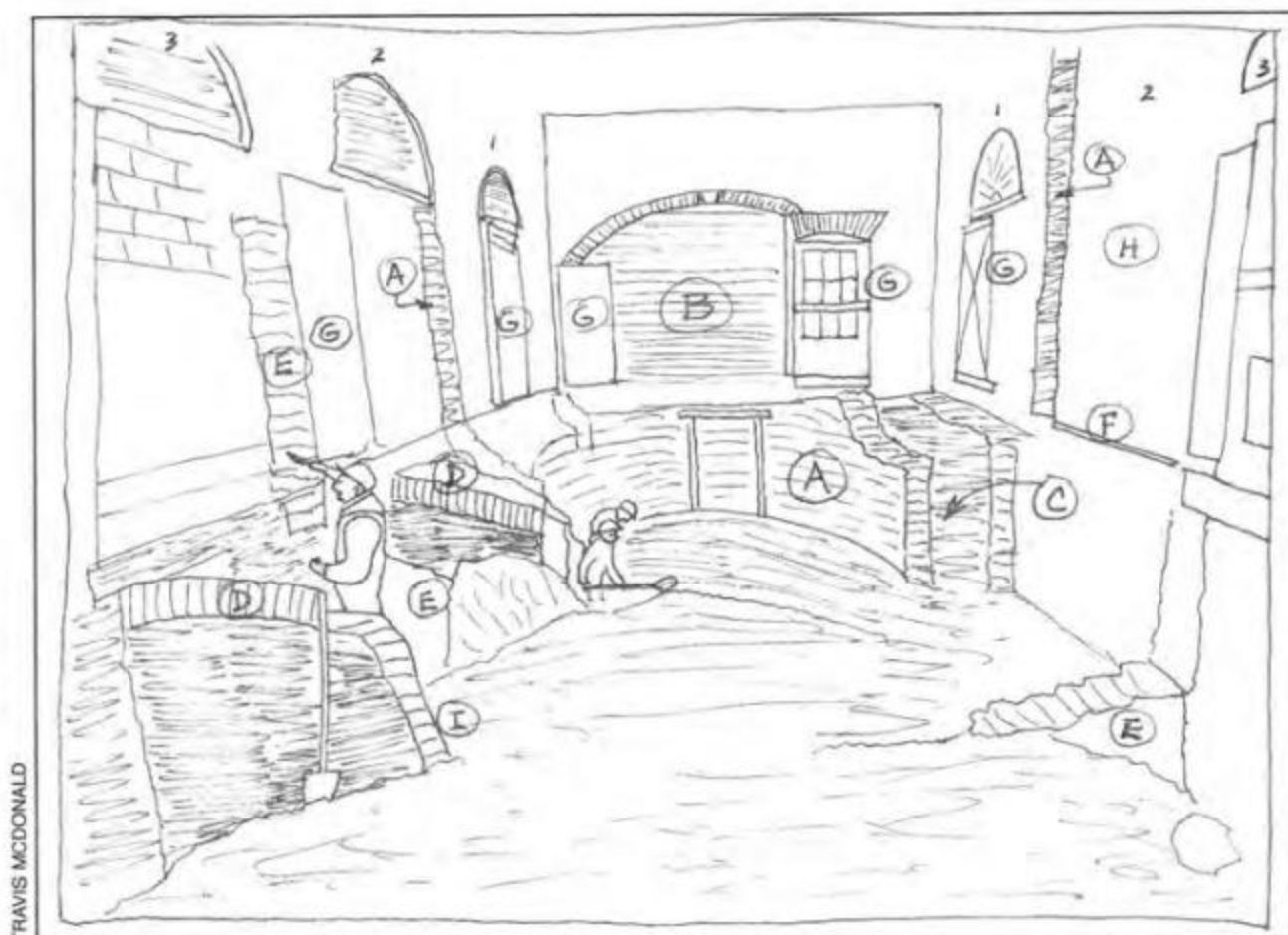
Photographs from a 1969 excavation in the West Wing confirm that the eighth lunette window opening had been a doorway and later filled with brick for a window (illustrations 24, 25).<sup>62</sup> Walter's 1853 plan also indicates the location of this doorway. Plans from 1877 and 1902 actually show it as a pass-through, with the north door aligned with one on the south. Architectural elevation drawings from McKim, Mead & White clearly show this doorway being reduced in size to a pedestrian one from its former, larger size.<sup>63</sup> The 1808 congressional report also stated that a coach house would be added "under the colonnade" of the east wing.<sup>64</sup> When this "temporary" "stable and coach house" function extended the east wing in 1809, supervised by Madison's



22. Top: In 1969 the eastern portion of the original west wing was excavated to create President Richard Nixon's Press Room. The three workers are working in and around the remains of the rediscovered cellar spaces that had not been seen since the nineteenth century. The photograph was taken from the room three space, the necessary. The perspective angles of the photograph are deceiving if the door and window bays are not used as markers.



23. Bottom: A visual anatomy of the excavation photograph can tell us many things: A is the circular ice house wall and the wall forming room two. B shows the later brick fill for the large arched opening that spanned the protruding section of the ice house. C is a space between the walls that most likely contained a wooden stair to the cellars. D shows two half arches that probably allowed coal to be stored beyond the north wall. E, on both left and right, represents the now vanished west wall of the wood room. F is the remains of a door to the wood room. G indicates five later period doorways. H is the brick-filled doorway to the wood room. I is the below-grade wall for the arch at D

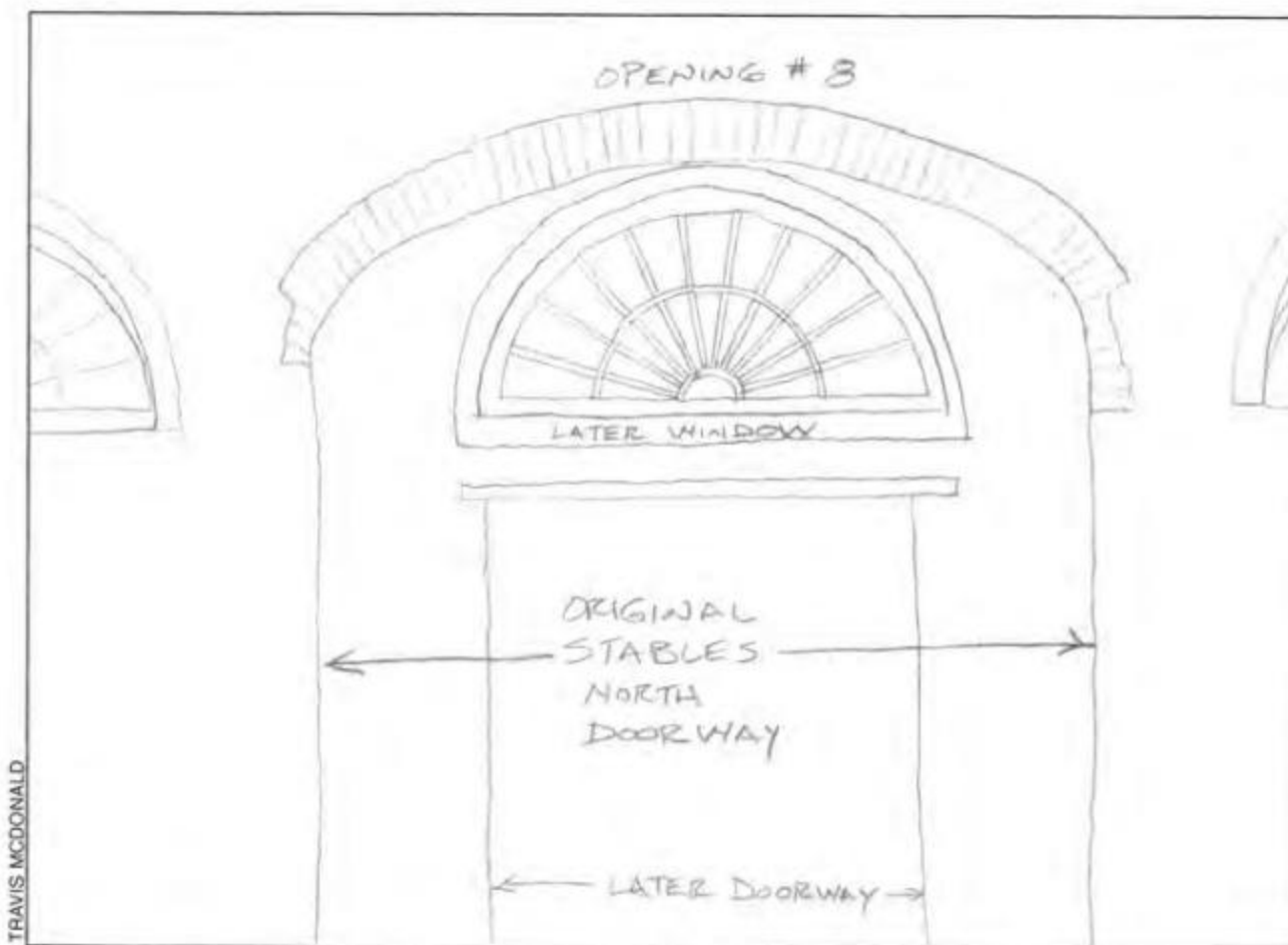




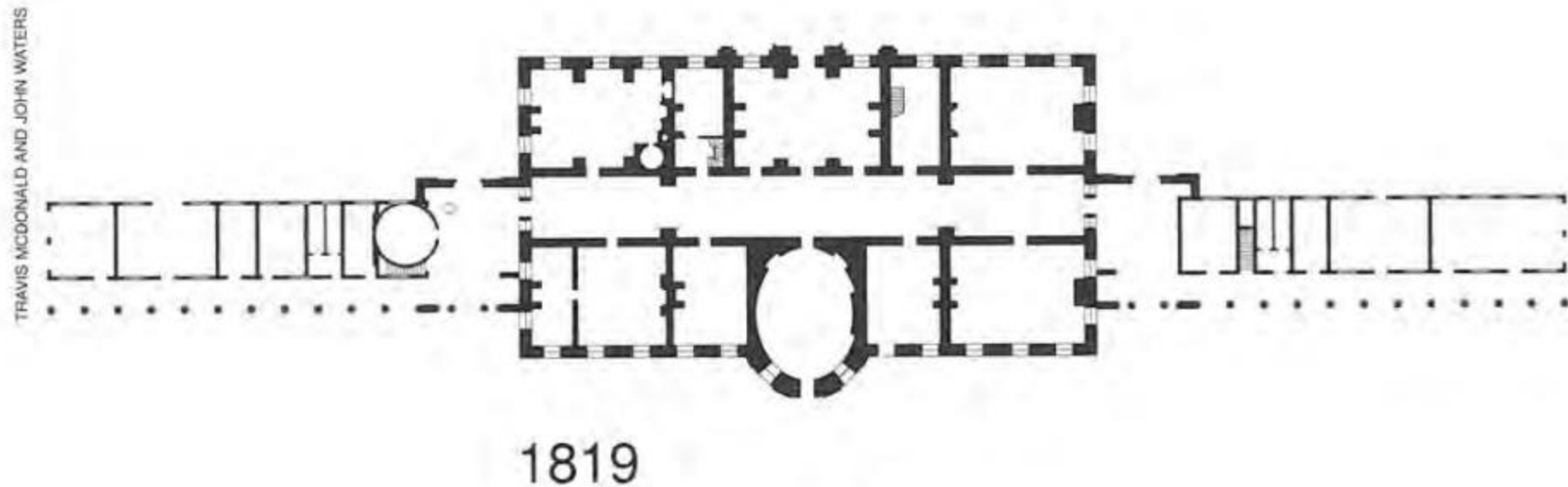


24. Top: In this 1969 photograph, the eighth window bay (from the east) of the west wing shows a much larger opening that has been filled.

25. Bottom: This overlay tracing of above photograph shows the original wider opening for the stables that was first filled in for a doorway that was finally itself filled in.





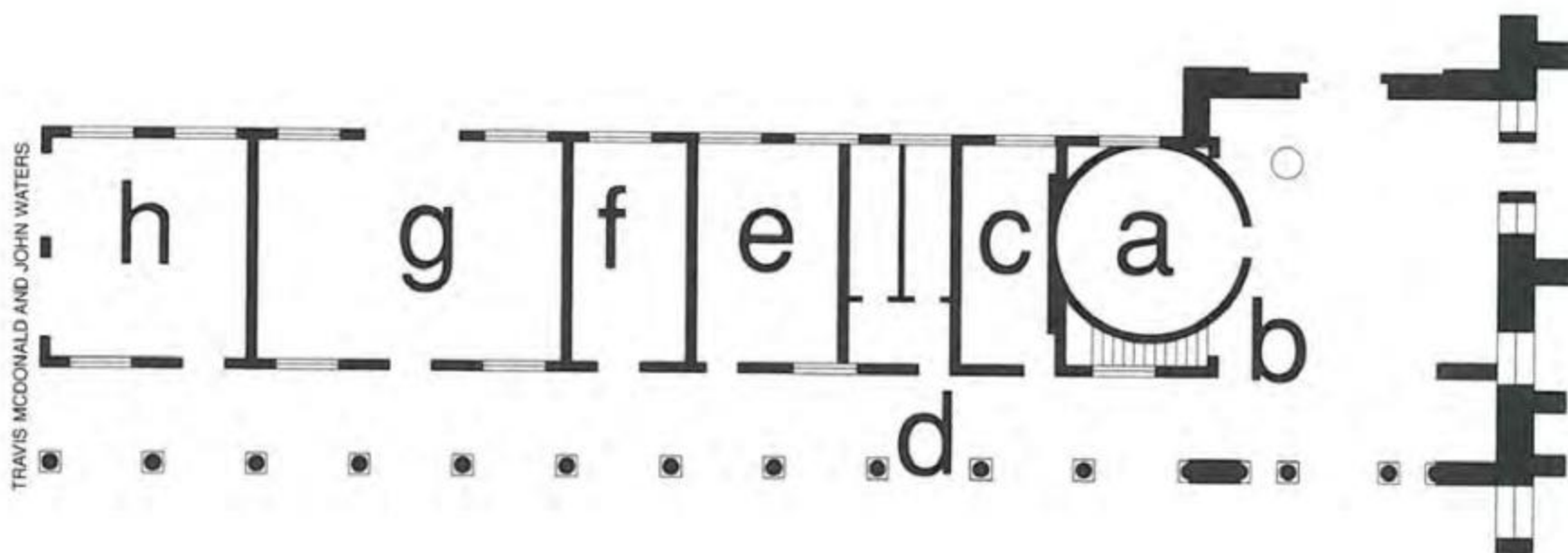
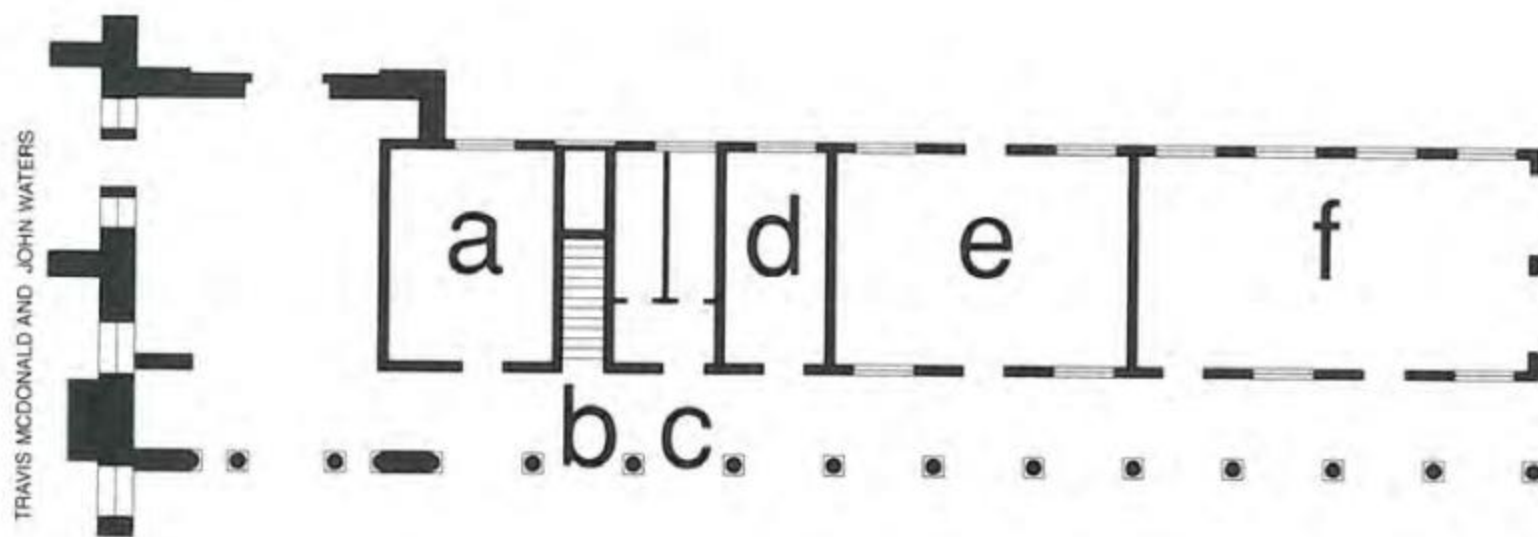


1819

26. Above: The west wing received its final form when Charles Bullfinch directed the postfire rebuilding in 1819.

27. Opposite, top: East wing plan, c. 1809. a, meat house (smokehouse) above and cellar below, 1805; b, stairs to cellar, 1805; c, necessary, 1805; d, servant's room or granary, 1806; e, stable, 1806; f, coach house, 1809.

28. Opposite, below: West wing plan: a, ice house, 1801/1805; b, stairs to cellar, 1805; c, wood storage above and coal below, 1805; d, necessary, 1805; e, servant's room?, 1805; f, granary, 1818; g, stables, 1818; h, coach house, 1818.



29. This chronological sequence shows the evolution of the wings from the South Front of the White House.



1803

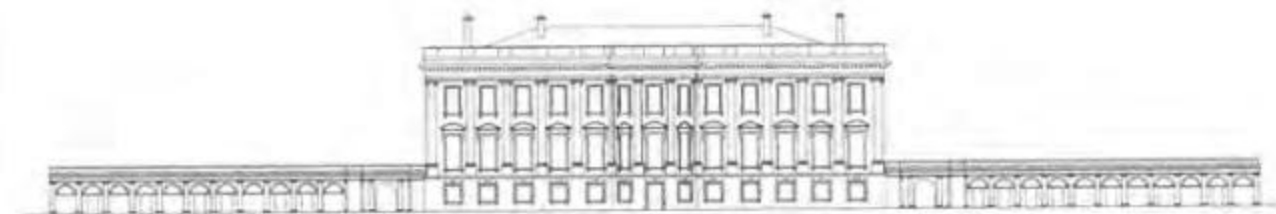


1805



1809

TRAVIS McDONALD AND JOHN WATERS



1819







1803

30. *This chronological sequence shows the evolution of the wings from the North Front of the White House.*



1805



1809



1819

31. *A comparative elevation of the current White House with its later West Wing Office Building.*



TRAVIS McDONALD AND JOHN WATERS

LORENZO WINSLOW PAPERS  
WHITE HOUSE COLLECTION



steward J. P. Sioussat, it faced the same colonnade access problem.<sup>65</sup> Walter's plan shows that two large carriage openings formed the east end of the carriage house. This temporary solution, due to the incomplete wing row, is also confirmed on the collaborative site plan c. 1805 showing Latrobe's bold marks leading a carriage drive from the north public grounds directly into the end of the east wing. Walter's 1853 plan shows the 1809 extension as two rooms, the western one being the carriage horse stable and not the servant's room or the "hen house," as intended on the original Jefferson plan.

### The Treasury Fireproof

At the same time that the White House wings were under construction and considered the president's project, Latrobe started his "own" project, for which he was "master"—or almost. On March 1, 1805, Congress appropriated \$9,000 for a Treasury fireproof building. Although fireproof wings were suggested by clerks in the Treasury, Jefferson saw them as part of his scheme for connecting the flanking public departmental buildings. The design of the fireproof buildings allowed Latrobe to demonstrate his professional architectural and engineering skills in comparison with Jefferson's. Latrobe first proposed to Secretary Albert Gallatin a quadrangle of fireproof buildings north of the Treasury that almost equaled its size.<sup>66</sup> The idea appealed to Gallatin but "in Compliance with Mr. Jefferson's wish" it became an eastern segment in the envisioned east-west chain of service buildings.<sup>67</sup>

Because the money for the fireproof building came through the Treasury, Latrobe served two masters: Secretary Gallatin who did not tend to interfere, and President Jefferson who had oversight of his surveyor of the public buildings and used it. Latrobe's beautifully executed drawing dated April 27, 1805, was sent to Secretary Gallatin but soon after was examined by Jefferson (illustration 34). The structure's fireproof nature was just the thing Latrobe loved, and he advocated for permanent and substantial construction: below-grade "carriage" arches in conjunction with a longitudinal groin vault, upper transverse arches that contained between them shallow masonry vaults, and cast-iron lunette window sash (illustration 35). Like the wings flanking the White House, and those projected for the future, Latrobe showed a Tuscan colonnade that

would provide a covered walk on the wing's south side and the typical "terras" roof of Jefferson's that is indicated in Latrobe's drawing by pitched wooden joists. Jefferson's "terras" covering was undoubtedly the weakest link regarding fire hazards. Inside were specially designed bookcases supported by iron rods passing north and south to the outer pier arches.

Jefferson apparently misread Latrobe's drawing, about which Latrobe confided to Lenthall: "The President objects to my mode of constructing the fireproof arches, and proposed another method, which won't do at all."<sup>68</sup> With an almost free hand, Latrobe told Gallatin that the design pleased him, being "infinitely the best morceau," and that he was "entirely satisfied" with his design freedom, on the fireproof project at least.<sup>69</sup>

When forced by financial circumstances to lop off the western two bays of the Treasury fireproof, reducing the building from 90 to 70 feet, Latrobe convinced Gallatin that a three bay, two story connection between the fireproof and the Treasury building could house a library for the secretary on its second floor adjacent to the secretary's office. Jefferson again intervened, as the idea involved his tenacious plan for the White House wings, and as Latrobe put it to Gallatin, he "interdicted your library upstairs."<sup>70</sup> After a conversation with Gallatin, Jefferson relented and allowed him the fashionable, shallow saucer-domed library space, which became even more elegant when filled with Latrobe-designed neoclassical furniture.<sup>71</sup> It was August 1807 when the 19 foot long section of the "fireproof of snail pace growth," which had collapsed and been rebuilt, finally reached completion, with its first floor fireproof room and the secretary of the treasury's library above.<sup>72</sup> This completed the easternmost end of the intended east wing range, but a gap of 250 feet still existed on this side of the White House (illustration 32, 33).

The final component added during Jefferson's time was the long-awaited stone Tuscan columns that lined up on the south of the wings, creating the covered passage colonnade. On the distant east end the Treasury fireproof never received the columns that were to join seamlessly with those of the extended wing sections beyond the planned central pavilion. If Latrobe ever drew plans for the central stable or coach house pavilions, they have been lost. Were these mysterious buildings ever built? It seems that Talbot Hamlin, in his Pulitzer Prize-winning biography of Latrobe of 1955,



misinterpreted letters referring to the Treasury fireproof connection collapse of 1806, thinking they were in reference to the middle pavilions. A number of historians thereafter relied on his interpretation and perpetuated the error. Hamlin's mistake stems from his misreading of Latrobe's letter to Lenthall of December 31, 1806, in which Latrobe offers his explanation of how the building connecting the fireproof section with the actual Treasury building collapsed. In that letter Latrobe references a "Carriage arch," which Hamlin took to mean an arch for a carriage opening rather than the below-grade groin vault's arch whose task it was to *carry* the masonry above, as in "the East carriage [that failed]."<sup>73</sup> A close reading of Latrobe's letter, keeping in mind that the Treasury connection was between the Treasury fireproof wing and the Treasury building to its east, dispels the notion of the middle pavilion as the subject of this letter, as do several other facts. Latrobe's indication of the middle pavilions on the collaborative site plan c. 1805 show the structure to be enormous in size, each about 70 by 130 feet. A building of this size, not too much smaller than the White House itself, would have to have been authorized and funded by Congress, but there is nothing in the records to this effect. It would no doubt have been thoroughly discussed by Jefferson, Latrobe, and Lenthall in its lengthy construction, yet there is no mention of its construction other than Jefferson's reference to its need in the future. The "new fireproof between the Treasury fireproof and the Treasury" did not have a finished roof and had to be temporarily covered with boards, and thus was vulnerable during the winter of 1806. Latrobe later mentions that the failure of the carriage arch was due to both frost damage and the premature removal of the centering from the upper arch. William Thornton's snide remark of March 1807 referring to Latrobe's arch failure, "one of the fireproof rooms, viz. that next the Treasury,"<sup>74</sup> has also been misinterpreted to mean the central pavilion. Latrobe's defensive reply to Thornton and James Hoban that the failed structure was rebuilt the following year for \$80 could hardly be for a large structure.<sup>75</sup> There are several mentions that the Treasury fireproof connection was rebuilt in 1807, but nothing about a stable or coach house structure collapse.<sup>76</sup>

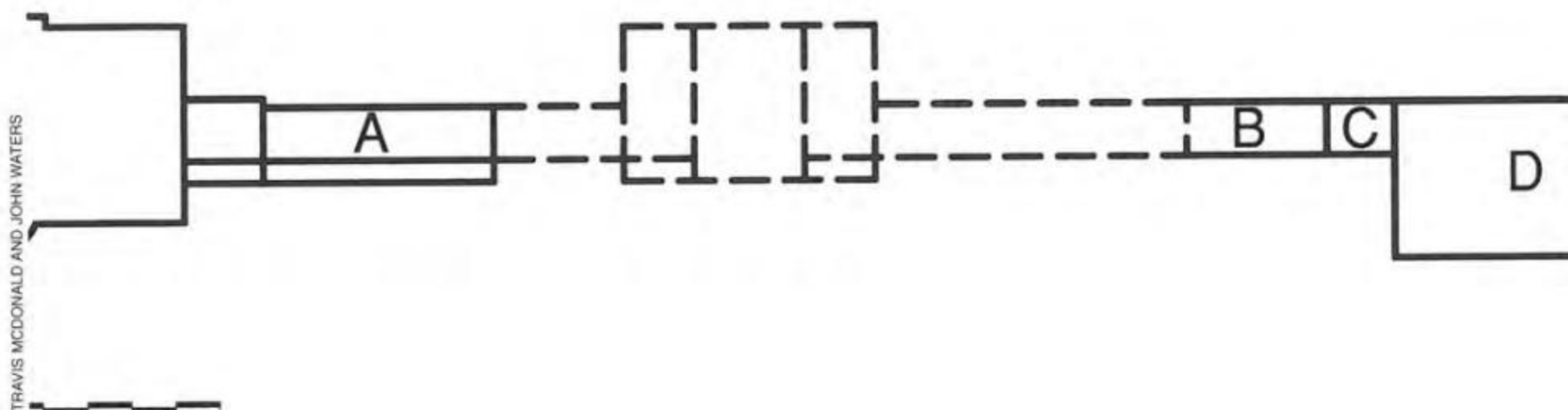
#### After the Jefferson Presidency

Thomas Jefferson left "the splendid misery"<sup>77</sup> of the presidency to his friend and protégé James Madison

in March 1809. At the end of that year Latrobe's surveyor of the public buildings annual report provided a summary of what had been done that year in addition to a concise history of his and Jefferson's time: "The appropriation made at the last session for the President's house, has been expended towards the arrangement of the grounds and garden within the enclosure; the coping of part of the surrounding wall, the construction of carriage house (the 60' extension of the east wing), and the better arrangement of the interior for the accommodation of a family." Latrobe then listed the priorities for the next year by first providing a history of accomplishments:

On the removal of the seat of government to Washington, in the year 1800, the President's house was in a most unfinished state, and quite destitute of the conveniences required by a family. The roof and gutters leaked in such a manner as materially to injure the ceilings and furniture. The ground surrounding the house barely enclosed by a rough fence, was covered with rubbish, with the ruins of old brick kilns, and the remains of brick yards and stone cutters' sheds. During the presidency of Mr. Jefferson, from the year 1804, annual appropriations have been made, by the aid of which several bed chambers were fitted up; the most necessary offices and cellars, which before were absolutely wanting, were constructed; a new covering to the roof was provided; a flight of stone steps and a platform built on the north side of the house; the grounds were enclosed by a wall, and a commencement was made in leveling and clearing them in such parts as could be improved at the least expense. But notwithstanding the endeavors of the late President, to effect as much as possible by these annual legislative grants, the building in its interior is still incomplete. It is, however, a duty which I owe myself and to the public, not to conceal that the timber of the President's house is in a state of very considerable decay, especially in the northern part of the building. The cause of decay, both in this house and in the capital is to be found, I presume, in the green state of the timber when first used, in its original bad *quality*, and in its long exposure to the weather before





32. Above: The mysterious middle pavilion proposed by Benjamin Latrobe would have been short of the east wing (A) as completed in 1819 and well short of the Treasury fireproof section of wing (B) and its connector (C) to the Treasury Department building (D).

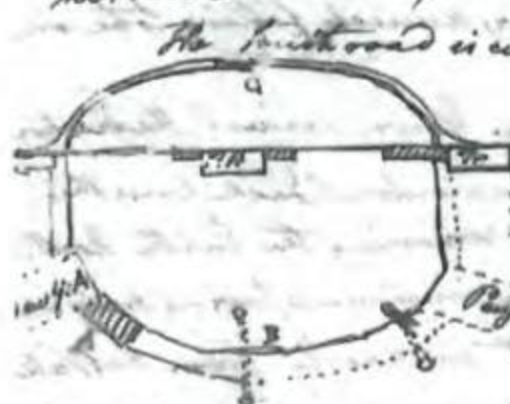
33. Right: This sketch by Latrobe in a letter to Jefferson from 1807 was in reference to the project for grading the grounds and enclosing it with a wall, but it also shows the extent of the east and west wings and their relationship to the Treasury's fireproof wing and connector.

The President's House.

Washington Sept. 2<sup>d</sup> 1807.

Dear Sir,

I wrote to you yesterday, again, you an account of the state of the work on the building of the Capitol. I will now report to you the progress of our work on the President's house.



The first road is cut out excepting only at the block A, at which the Senate had at work & in three walls they will have removed it.

From the point B westward the wall has not been touched. The face of the ground is cut down perpendicularly

from that point, with a flight fence on the top all the distance from within will be preserved, and access rendered in all places from without from the same point eastward to the Treasury fireproof which is fireproof excepting only opposite to the Pennsylvania Avenue which it is not for the purpose of drainage with the wall it can be removed. You will, I am sure, be highly satisfied with the result. I am, Sir, very respectfully, your obedient servant, B. Latrobe.

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35. *Left: Latrobe sketched this delicate lunette window in one of his many letters to construction supervisor John Lenthall in 1805. To contribute to the fireproof nature of the Treasury fireproof building, he designed the window to be made of iron.*



*the buildings could be roofed. Further progress in the leveling and planting of the ground, in the coping of the wall, and in current repairs and minor improvements, are also included in the estimate submitted.*<sup>78</sup>

Clearing and improving the grounds around the house had been a constant and never-ending story, paralleling that of the wings. Landscaped grounds were never far from Jefferson's mind as he looked out his study window onto the bleak surrounding site's contrast to the breathtaking distant views. Even more to Jefferson than Latrobe, landscape was integral with architecture. The fits and starts of improving the White House grounds had been excruciatingly slow due to the laborious amount of work entailed and to congressional appropriation for the same. Jefferson's unexecuted plans, seen perhaps as an echo on the collaborative site plan c. 1805, were not in vain, however, because they reappeared in his landscape at his retirement villa retreat Poplar Forest. Starting in 1805, as he worked on various projects from his White House study, Jefferson had been sending and receiving weekly letters to his workers in Bedford County, Virginia, who were preparing the modern octagonal house he would use as soon as he departed public life in March 1809 and continue to use until 1823.<sup>79</sup> Seale has indicated that Jefferson's landscape ideas were not forgotten but finally found form in schemes executed by Hoban, John Quincy Adams, and Andrew Jackson.<sup>80</sup>

In 1814 British marines infamously compromised the physical preservation of Jefferson's "office" wings. After the devastating fire, President Madison declared the following year that all must be rebuilt as before, without deviation. James Hoban, the original architect, came back by conservative demand to rebuild the largely destroyed mansion, just as Latrobe also returned to rebuild the Capitol.

Both Latrobe and Thornton inserted themselves as architects willing to help with a White House rebuilding directed—in an ironic second poor choice, they must have felt—by the original architect. Latrobe saw the opportunity to influence some kitchen improvements in the basement, while Thornton sought to help with the wings. Thornton solicited former President Jefferson's advice in 1815 on rebuilding and completing the wings and enlarging the executive office buildings. When Congress failed to approve either, Thornton suggested

to Jefferson that the ends of the wings be terminated on top with neoclassical *tempietos*. As C. M. Harris has noted, Jefferson "would not, and probably could not, return to these past scenes."<sup>81</sup>

Phoenix-like, the house, and then the burned wings, rose again and returned to use in 1818. President James Monroe suggested, either from Thornton's inquiry or perhaps after a conversation with his friend Jefferson, that the service wings be extended all the way east and west as intended.<sup>82</sup> When denied funding in 1819, Monroe insisted that a new coach house and stables be built on the west, abandoning the "temporary" coach house and stables that had been added "under the colonnade" on the east. The Report of the Committee on the Public Buildings from January 1819 stated that the western extension was 60 feet long, a symmetrical necessity to match the 60 feet added earlier to the east wing (illustration 28).<sup>83</sup> Hoban's addition housed a stables, carriage house and granary. Walter's plan shows that the carriages were accessed from large openings on the west end in a fashion similar to that on the east wing. Photographs from the 1969 excavation of the west wing confirm that the eighth lunette window opening in the stables space had been a north access doorway that was later filled in (illustrations 24, 25). This north doorway, similar to one on the east wing, is shown on plans from 1877 and 1902. Architectural drawings from McKim, Mead & White show this doorway being reduced in size to a pedestrian one from its former, larger size. On the east the extant wing stopped about 50 feet from the intended position of the intended pavilion and 200 feet short of the Treasury fireproof. The enormous 450 foot gap between the White House and its flanking federal buildings equaled a vast space that required congressional funding to fill.<sup>84</sup>

Hoban's 1818 construction estimate for the wings reveals little about Jefferson's original plans or departures from what existed before the fire. Hoban's specification of copper for the wing roofs does not detail the roof construction or shape. Did he replicate Jefferson's zigzag roof system? From early illustrations it appears that the roof had a low profile behind the low parapet and might still have served as a terrace walk. The roof was apparently flat enough to serve the first greenhouse added on top of the west wing in 1857. Hoban's estimate for the wing's ground-up construction provides some evidence of the extent of Jefferson's west wing.



Along with the “best granite” stone for foundations, and freestone for the north and west exterior-facing walls, the parged brick exterior walls that formed the new stables courtyard contained 60 feet of “entablature over columns,” “6 column shafts,” and 11 semicircular windows, ensuring the wing would visually fit with its original neighbor. The walls shown on the 1853 Walter plan seem to confirm the room divisions and an open carriage end similar to one on the east.

The Treasury fireproof also got a postfire makeover as a toolshed for the now-installed vegetable garden to its south, shown proposed on the collaborative site plan c. 1805. Given Jefferson’s love of vegetables, this must have been his intention, because he had sketched a plan in 1807 that designated a 100 foot wide garden space to the south of each terminating double range wings, reserving about 1,000 feet in between for a pleasure garden (illustration 33).

The use and function of Jefferson’s rebuilt wings changed over time as frequently as the building they supported. By the end of the 1820s the gardener, John Ousley, and his family were residents of the former fireproof wing, while cows temporarily resided in the west wing along with servants. Andrew Jackson’s new remote stables near the southeast gate freed the old stable wing for service and as the residence of the vegetable gardener, Charles Bizet, in the 1830s. In 1835 the old Treasury fireproof building was upgraded from toolshed to orangery by Andrew Jackson to house a salvaged sago palm from Mount Vernon, among other things.

During the 1840s the west wing laundry room that had moved out of the basement caught fire. Fire was still a danger from the kitchen that never left the basement space. During the 1850s the orangery was taken down, rebuilt, and demolished, its function moved to the roof of the west wing. The privies were moved to the space between the wings and the house, freeing up space for servants’ quarters and bathing rooms in the west wing along with the continuing laundry and ironing function. Andrew Jackson’s own shower bath was put in the east wing in 1832.

By 1870 the ice house had been floored over for a black servants’ dining room and lounge, hiding that earlier feature for the rest of the century. The most dramatic change came in 1866, when the east wing, having succumbed to a toolhouse, potting shed, and compost storage, was demolished and a balcony added to the east

elevation in its stead. When the west terrace greenhouse burned in 1867, the entire roof was rebuilt with iron support beams and brick arches that supported a new greenhouse on top. President Ulysses S. Grant found the west wing convenient for his infamous billiard room in the east end of the conservatory just next to the house. President Rutherford B. Hayes took full advantage of the Victorian conservatory fad by rebuilding one of cast iron on the west terrace in 1880 and expanding with even more of them to the south of the wing. Hayes also relocated the billiard room to a space in the lower wing and reinstalled Jefferson’s prominent glass doors that let family or guests promenade from the dining room into the popular tropical plant splendor.

Jefferson had created the terraces as a place to sit or stroll, enjoying the outdoors in good weather. While he undoubtedly used them for this purpose, the view was one of still open spaces retaining some naturalness in the far south vista. Had he been there in Hayes’s time he, too, might have used the greenhouses as a retreat from an expanding and encroaching Federal City.

President Theodore Roosevelt chose for a major White House remodeling in 1902 the New York architect Charles McKim of the famous McKim, Mead & White firm. McKim sought to bring Beaux-Arts order to the exterior by removing what he considered as unsightly the greenhouses that crept out from the house in a southwestwardly direction. He finally won a sensitive battle of influence over the first lady and other conservatory lovers, smashing the houses of glass and restoring Jefferson’s idea of an exterior flat roof promenade. To further restore Jefferson’s vision, McKim convinced Roosevelt to champion a reconstructed east wing to match and balance that of the west. This new east wing took on higher purpose than its predecessor and served as a secondary entrance to the house.

The west wing continued to house servants and laundry functions, but McKim and his government contact Colonel Theodore Bingham added an important new building just west of the old wing. A presidential and staff office building allowed those functions to depart the Second Floor of the White House, leaving their spaces to be remodeled for the needs of a good-size presidential family.

President William Howard Taft expanded the president’s office even more, taking over the west wing and moving some service functions back into the basement



36. By the late nineteenth century, the greenhouses had expanded to the west considerably beyond the roof of the west wing where they humbly started in 1857 for the pleasure of President James Buchanan.



LIBRARY OF CONGRESS

37. The reconstructed East Wing took as its model the remains of the original west wing but with a new role as the principal social public entry to the house, along with reception rooms, lounges, and offices.



WHITE HOUSE COLLECTION

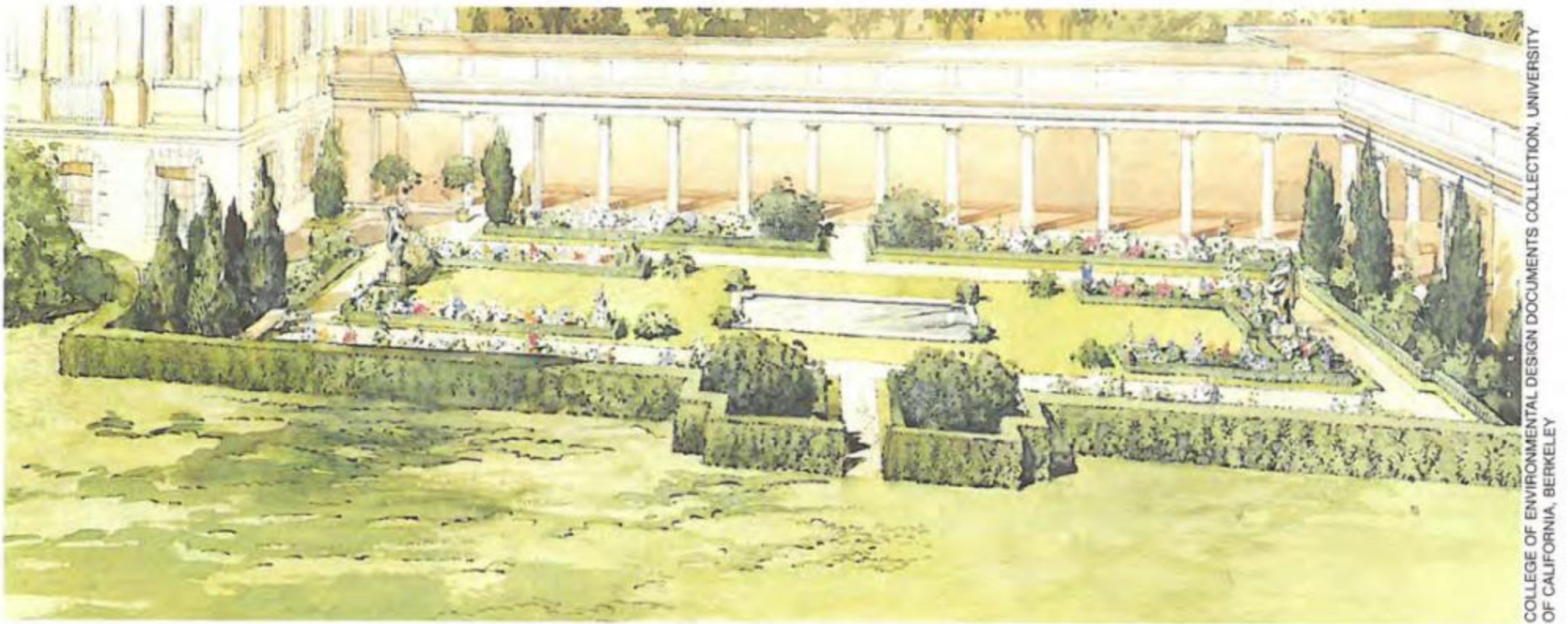


38. In 1902 the East Wing was reconstructed in the same location by Charles McKim, providing a visual balance to the west wing that had been stripped of its greenhouses. During excavation the contractors found and dug up the original east wing's foundations.



39. President Franklin D. Roosevelt scooped out the western portion of the original west wing in 1933 for his exercise pool, funded by school children around the country.





COLLEGE OF ENVIRONMENTAL DESIGN DOCUMENTS COLLECTION, UNIVERSITY OF CALIFORNIA, BERKELEY

40. Above: After the East Wing's reconstruction the landscape designer Beatrix Farrand designed this formal flower garden and pool as its complement in 1913. The colonnade is shown open as it would have been originally, but after it was enclosed in glass it became even more of an all-weather passageway than Jefferson had intended.

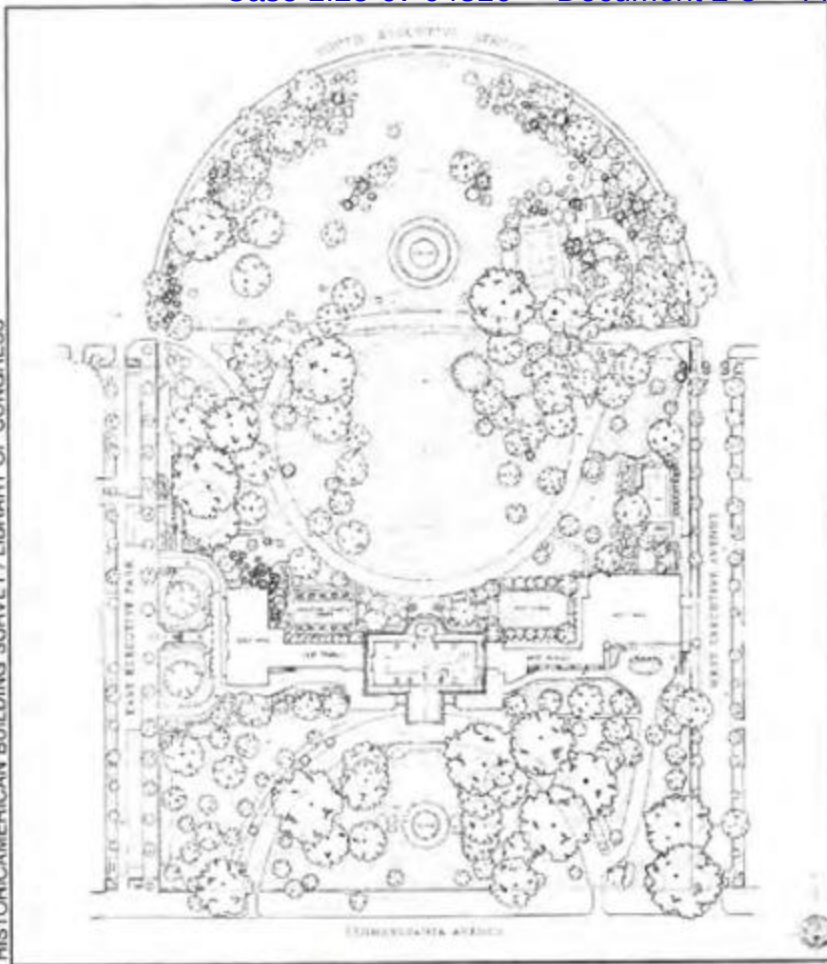
41. Right: By the late nineteenth century the former ice house, so important to Jefferson, had evolved into a servants' dining room and still later into an office and then the West Garden Room. This photograph from 1902 shows the large original arch that spanned the protruding round ice house that was first enclosed in wood along with the original well.



SAGAMORE HILL NATIONAL HISTORIC SITE



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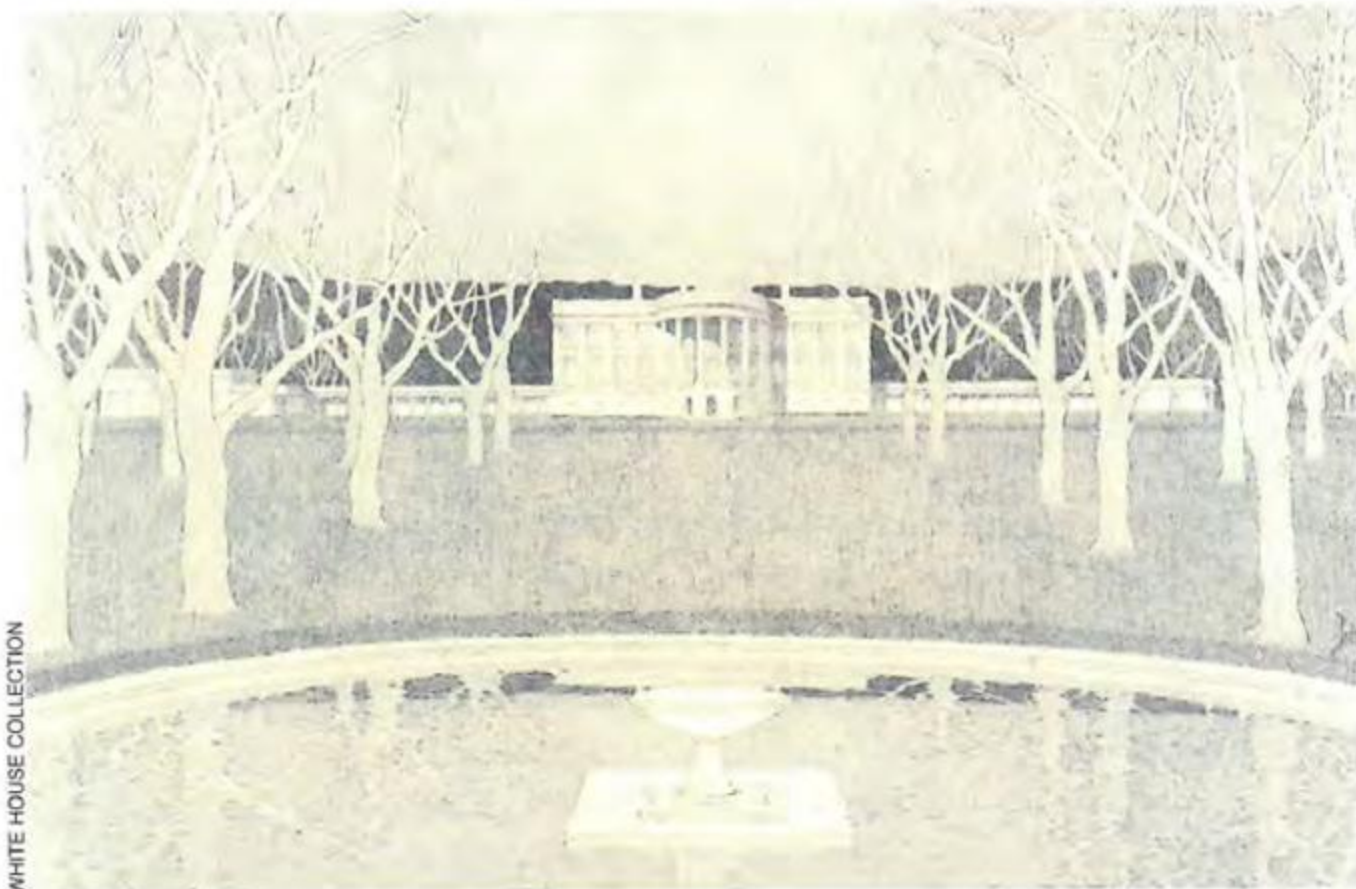


42. Top: As it evolved over two centuries, the South Lawn took on the pleasant ornamental grounds appearance envisioned by Jefferson, with paths winding through naturalistic woods. It remains, as he conceived it, the private side for presidents and their families.

43. Center: Artist Jules Guérin's rendering of the White House in 1902, after the return of the East Wing, eerily evokes, in an ascetic way, Jefferson's design of a central lawn and allée of trees, creating a landscaped "room" through which to stroll.

44. Bottom: The West Wing returned to its earlier form after the architect Charles McKim achieved for the removal of the numerous greenhouses that had sprung up through the later nineteenth century.

WHITE HOUSE COLLECTION



SAGAMORE HILL NATIONAL HISTORIC SITE





where they originally began. In the process, Taft built the first Oval Office. Another exchange of service “office” rooms for real clerks’ offices took place during President Woodrow Wilson’s term. Finally, under President Herbert Hoover, when the president’s office building was destroyed by fire, it was rebuilt even larger, replacing the old wing as the Oval Office we know today.<sup>85</sup>

McKim’s reconstructed East Wing continued to serve later presidents in the role for which it was designed, while the West Wing offered space with which to fiddle. Architectural fiddling is what pleased President Franklin Roosevelt, and in 1933 student contributions from around the country funded his exercise swimming pool and two dressing rooms within the West Wing walls. Roosevelt’s architect, Lorenzo Winslow, proudly kept the Jeffersonian lunette windows of the north wall but added glass doors on the south to help light the room.<sup>86</sup> Gone from the West Wing forever were the “office” functions of both sorts. In 1969, in an ironic boost to press reporters’ convenience, President Richard Nixon floored over FDR’s swimming pool room that had been recently remodeled by President John F. Kennedy and created the Press Room that remains today. Workers on bulldozers within the wing posed for the camera, looking eerily like President Harry S. Truman’s directed army of bulldozers that had scooped out the interior of the White House in 1949–50.<sup>87</sup> Unfortunately, whatever evidence of Jefferson’s original wing spaces that might have been gathered at that time is only accidentally captured in these photographs. As late as 1985 the staff of the Ronald Reagan White House, working on a new “west garden room” west of the house in the original north-south exterior passage, briefly revealed traces of the wing’s large arch that had spanned the ice house.

Thomas Jefferson’s spirit returned to the White House in the twentieth century after a long absence in the later nineteenth. It was not so much a guardian spirit, with so little left to guard, as it was a name invoked for periodic remodeling progress and the occasional brief reminders when architectural relics were found and destroyed. In making his case to clean up the White House exterior, Charles McKim invoked the spirit of Jefferson, as he did that of L’Enfant at about the same time when cleaning up the Mall under the McMillan plan. McKim referred to the “restored” wings

on the house as returning the “saucer” to the “cup.”<sup>88</sup> He proudly reported the discovery of the original east wing’s foundations as they were excavated for the new reconstructed wing (illustration 38). Jules Guérin’s evocative images from 1902 show a romanticized landscape with the visual impact of Jefferson’s two wings as they might have looked had his landscape been executed (illustration 43). McKim was not a historical architect by any means, but his partner Stanford White had been immersed in studying Thomas Jefferson during the reconstruction of the Rotunda at the University of Virginia in the 1890s. McKim’s passing interest in Jefferson led Roosevelt to acknowledge him in a public statement: “In making the restoration the utmost care has been exercised to come as near as possible to the early plans and to supplement these plans by a careful study of such buildings as that of the University of Virginia, which was built by Jefferson.”<sup>89</sup>

Excavations inside the West Wing have from time to time turned up bits of Jefferson’s structure. Hoover’s remodeling in 1929 revealed some, as did the 1933 installation of Franklin Roosevelt’s pool. Truman invoked Jefferson for a hotly criticized project of adding to the White House exterior. Having given a speech at the University of Virginia in 1947, Truman admired Jefferson’s suspended balconies on The Lawn pavilions and used that device’s origin in arguing for a similar suspended balcony on the South Portico. Although Jefferson is probably mentioned by every president who dwells in the house, Kennedy famously invoked Jefferson’s intellectual spirit in his tribute during a Nobel laureates’ dinner: “I think this is the most extraordinary collection of talent, of human knowledge, that has ever been gathered at the White House, with the possible exception of when Thomas Jefferson dined alone.”<sup>90</sup>

Since the 1940s Jefferson has stood in oversize bronze in the Jefferson Memorial, gazing north toward the White House. Jefferson would not lament the loss of his architectural vision or the treatment of his special wings, for he was known to favor the future over the past. The White House remains, in the words of William Seale, far more significant as a “cultural artifact” than as a misunderstood piece of venerable architecture.<sup>91</sup> Inherent in the original wings, however, are the thematic elements of Jefferson’s synthesis of ancient and modern architecture, landscape design and nature, construction technology, and the efficiency of domestic and public



service. Jefferson's wings, like the house itself, have suffered use, reuse, and abuse. They recall the unfulfilled and unfinished business that is historically appropriate for the ever-changing nature of the White House. There newness has always been considered superior, and even in the nation's best interest, to any regard for historical fabric. Like the unquenchable need to use and interpret Thomas Jefferson from generation to generation, the symbolic and imaginative power of the White House is intangible and never ending, and always focused on the present and the future.

## NOTES

1. See William Seale, *The White House: The History of an American Idea*, 2nd ed. (Washington, D.C.: White House Historical Association, 2001). General references to the history and the architectural history of the White House are based primarily on this book and on other published sources to which all White House researchers in the past twenty years must turn: William Seale, *The President's House: A History*, 2nd ed. (Washington, D.C.: White House Historical Association, 2008); and various articles in *White House History*, all published by the White House Historical Association. For convenience, see the three bound volumes of *White House History* (2004 and 2008).
2. Jefferson's architectural style and taste were decidedly different from Washington's. Jefferson had anonymously entered the 1792 competition with his version of Andrea Palladio's Villa Rotonda, but while his plan won second place, it was perhaps too radical for the time. When Jefferson failed to win over conservative minds, he fell silent on the issue in deference to Washington. Nevertheless, he had architectural traditions and personal forms that he would carry with him everywhere, including to the new national capital.
3. Seale, *President's House*, 109.
4. S. Fiske Kimball first discussed Jefferson's various plans for alterations in the Virginia Governor's House in Williamsburg, in his rented Paris house, and in his rented town houses in New York and Philadelphia. Kimball, *Thomas Jefferson, Architect* (1916; reprint, New York: Da Capo Press, 1968). See also Mark R. Wenger, "Thomas Jefferson, Tenant," *Winterthur Portfolio* 26, no. 4 (1991): 249–65.
5. Jefferson remodeled Monticello, first begun in 1769, after he returned from Paris in 1789 and completed it c. 1809; he began Poplar Forest in 1805 and completed it in 1826; and he began designing the University of Virginia c. 1810, with construction beginning in 1819.
6. In addition to Seale and Kimball, the complicated Jefferson and Latrobe architectural collaboration is found principally in Michael W. Fazio and Patrick A. Snadon, *The Domestic Architecture of Benjamin Henry Latrobe* (Baltimore: Johns Hopkins University Press, 2006); Jeffrey A. Cohen and Charles E. Brownell, *The Architectural Drawings of Benjamin Henry Latrobe* (New Haven, Conn.: Yale University Press, 1994), vol. 2; Talbot Hamlin, *Benjamin Henry Latrobe* (New York: Oxford University Press, 1955); Saul K. Padover, *Thomas Jefferson and the National Capital* (Washington, D.C.: U.S. Government Printing Office, 1946); William C. Allen, *History of the United States Capitol: A Chronicle of Design, Construction, and Politics* (Washington, D.C.: U.S. Government Printing Office, 2001); and C. Ford Peatross, ed., *Capital Drawings: Architectural Drawings for Washington, D.C., from the Library of Congress* (Baltimore: Johns Hopkins University Press, in association with the Library of Congress, 2005).
7. Benjamin Latrobe's floor plan drawing of 1807 shows how Jefferson intended to remodel the house based on his experience with French *hôtel* (town house) plans for apartments that were fashionable when he lived in Paris in the late eighteenth century. See Seale, *President's House*, 62; Michael Fazio and Patrick Snadon, "Benjamin Latrobe and Thomas Jefferson Redesign the President's House," *White House History*, no. 8 (Fall 2000): 36–53.
8. The architectural historian Vincent Scully has commented on the Jeffersonian, and American, trend for horizontal spread: "Much of Jefferson's work should be seen, metaphorically speaking, as a struggle between the fixed European past and the mobile American future, between Palladio and Frank L. Wright, between a desire for contained, classical geometry and an instinct to spread out horizontally along the surface of the land." Vincent Scully, quoted in Lois Craig, *The Federal Presence* (Cambridge, Mass.: MIT Press, 1978), 27.
9. Lucia Stanton, "'A Well-Ordered Household': Domestic Servants in Jefferson's White House," *White House History*, no. 17 (Winter 2006): 8.
10. Examination of photographs showing the interior of these wing walls during deconstruction in 1969 confirm the practice of an interior brick wall using a three course common or American bond whereas the outer wall was undoubtedly the more refined Flemish bond. The outer and inner courses would be bonded together with header and stretcher bricks respectively. It was common for Jefferson to specify for public buildings that the outer mortar be richer in lime than the inner-face mortar and that a lime mortar grout be used between the two. He used these specifications at the University of Virginia.
11. Thomas Jefferson, *Jefferson's Memorandum Books: Accounts, with Legal Records and Miscellany, 1767–1826*, ed. James A. Bear and Lucia C. Stanton (Princeton: Princeton University Press, 1997), 2:1066.
12. Sir Augustus John Foster, *Notes on the United States of America Collected in the Years 1805–6–7 and 11–12 by Sir Augustus John Foster, Bart.*, ed. Richard Beale Davis (1954; reprint, Westport, Conn.: Greenwood Press, 1980), 12. Latrobe wrote, "The President's House was erected by an Irish mason who gave as his own the plan of the Duke of Leinster's house in Dublin. This being shown to General Washington was approved of by him; and the Irishman, who had been but a journeyman under the real architect and designer of the plan, was appointed to superintend the building. He left out the upper story however and built no cellars, which President Jefferson, after experiencing great losses in wines, has been obliged to add at a depth of sixteen feet under ground. These are so cool that the thermometer stood two degrees lower in them than it did in a vacant spot in the ice-house early in July, when in the shade out of doors it was at ninety-six."
13. Benjamin Henry Latrobe to William Lee, March 22, 1817, *The Correspondence and Miscellaneous Papers of Benjamin Henry Latrobe*, ed. John C. Van Horne and Lee W. Formwalt, et al. (New Haven: Yale University Press, 1984–88), 3:873.
14. Foster, *Notes on the United States of America*, 12; Latrobe to Lee, March 22, 1817.
15. Latrobe faced the complications of taking over design and construction of buildings that had been designed by others and partially constructed. His uneasy relationship with Congress stemmed from his contention that much of the already constructed Capitol, designed in competition by William Thornton, was faulty in both structural design and quality of construction. Latrobe's criticism of Thornton's skill resulted in a protracted war of words between the two, especially after parts of the Capitol collapsed. Latrobe was called back after the 1814 fire to rebuild the Capitol. The classic story of the Capitol's architectural history and its roster of prominent architects is contained in Glenn Brown, *History of the United States Capitol* (Washington, D.C.: U.S. Government Printing Office, 1900) and updated by Cohen and Brownell, *Architectural Drawings of Latrobe*; Padover, *Jefferson and the National Capital*; Allen, *History of the United States Capitol*; and Peatross, ed., *Capital Drawings*.
16. Latrobe to Mary Elizabeth Latrobe, November 24, 1802, *Correspondence of Latrobe*, ed. Van Horne and Formwalt, 1:232.
17. Latrobe to Jefferson, March 26, 1805, *The Microfiche Edition of the Papers of Benjamin Henry Latrobe*, ed. Edward C. Carter and Thomas E. Jeffrey (Clifton, N.J.: James T. White & Company, 1976). Latrobe was as meticulous as Jefferson in his correspondence, separately numbering sequential letters to different people. This numbering system is evident in the microfiche copies, providing great service to researchers, but the numbers do not appear in the published letters. Latrobe was delighted in 1803 to start using Charles Willson Peale's polygraph machine that produced, by means of an attached second pen, a copy of each letter written. In February 1804 Latrobe lent Jefferson his polygraph to try and asked Peale to send one to the president for his own. Jefferson began using his in 1804 and later remarked that it was the finest invention of his age, reflecting the care he took to document his life and letters. For later historians of Jefferson and Latrobe, their use of this machine is the equivalent of a modern copy machine as opposed to press-copy roller machines that produced a faint, backward copy. The only other good letter and document copies of the time were those copied by clerks who were paid to do so for official reasons. Jefferson had hopes that the government would purchase multiple polygraph machines to lessen the reliance on copy clerks.
18. Latrobe to Jefferson, May 4, 1805, and April 28, 1805, *ibid.*
19. Latrobe to John Lenthall, May 3, 1805, *ibid.*
20. Latrobe to Lenthall, May 11, 1805, quoted in Seale, *President's House*, 113.



21. Jefferson to Latrobe, May 26, 1807, *Microfiche Papers of Latrobe*, ed. Carter and Jeffrey. Perhaps as payment for the loan of the copiously illustrated books, Latrobe hand-tinted all the plates.
22. Latrobe, "Report on the Public Buildings," December 22, 1805, *Correspondence of Latrobe*, ed. Van Horne and Formwalt, 2:168–72.
23. The drawings are illustrated in this article; illustrations and photographs are in the Office of the Curator, The White House. See also Report of James Hoban, Superintendent of the President's House, to Samuel Lane, Commissioner of Public Buildings, Washington, December 3, 1816, available at loc.gov. This author has diligently combed many primary and secondary sources for this article. However, one important source—the various files of correspondence in the National Archives—was not examined firsthand but through William Seale's two monumental works, *The President's House*, and *The White House*. An excellent guide to the most important White House records is contained in Alysha E. Black, "Making the Most of the Archives: Finding White House Documentary Sources at the National Archives," *White House History* no. 9 (Spring 2001): 4–13.
24. Latrobe to Lenthall, July 29, 1805, *Microfiche Papers of Latrobe*, ed. Carter and Jeffrey.
25. Jefferson's drawing shows the ice house as 20 feet from the house, but between the house and the ice house is written "24 feet," an annotation that might indicate someone verifying the actual dimensions when constructed. It is possible that the vaulted cellar space under the meat house could have been used for storing other liquors such as beer or cider.
26. The Jefferson drawing shows a doorway and a small space on the south wall of the ice house that might have been a space for a staircase to the coal cellar, but nothing supports this idea and in fact other clues suggest it was always a window bay, although later a doorway was retrofitted in the area.
27. Seale, *President's House*, 112. Whether the west privy was for all servants or only for black servants is not known. Interestingly, of the two octagonal original privies at Poplar Forest, oral history claims that one was for the family and guests and the other was for the later nineteenth-century tenant farmers and thus likely for the enslaved population during Jefferson's time since there did not seem to be a segregation in early privies by sex, but by race.
28. Jefferson's statement in 1807 that he wanted to extend the west wing by 50 feet would work with the evidence that it eventually was 100 feet long. Jefferson to Latrobe, August 5, 1807, *Microfiche Papers of Latrobe*, ed. Carter and Jeffrey. The initial 50 foot length is also confirmed by an 1811 perspective drawing from the north by Latrobe that shows the west wing with five window bays.
29. The Monticello ice house roof was correctly reconstructed in 2009 and is probably identical to that at the White House, with the exception of the inserted wine room.
30. Jefferson's drawing also shows a wooden south wall, similar to ones at Monticello, that was eventually constructed in brick intended to be stuccoed. The north wall of the first segments was constructed of stone below grade and brick above grade. The second segment of wing was constructed with brick below and above, according to photographs from 1969.
31. At the time of the Walter plan the large room formed by combining rooms two and three served for wood and coal storage without the need of an underground space; the stairs access might have been closed off and the space shown as solid masonry.
32. Latrobe to Jefferson, September 13, 1805, *Microfiche Papers of Latrobe*, ed. Carter and Jeffrey.
33. Generally, how were permanent privies cleaned? Permanent privies, such as the temple-like octagonal brick privies at Poplar Forest, did not use a deep shaft for waste and required a clean-out method of one type or another. If not a removable section right under the seat as in a close stool, or some type of drainage system, access was needed to a deeper space below. At Poplar Forest this access consisted of an arched opening at grade both for the octagonal privies and for the retrofitted privy under the staircase next to Jefferson's chamber. On the north public front of the White House wing this method seems unlikely. Rather, it seems that a vaulted space under the privy, adjacent to a similar one for the coal cellar, provided access for servants to haul away waste.
34. In both places Jefferson solved the low ceiling-smoky room problem by creating a vestibule with a fireplace where logs could be fed without being in the smoky space. The flue simply went into the room on the other side of the vestibule. A doorway on the side of the vestibule would provide access, when needed, to place or retrieve the meat.
35. Jefferson to Latrobe, May 11, 1805, *Correspondence of Latrobe*, ed. Van Horne and Formwalt, 2:67; Jefferson to Latrobe, August 5, 1807, *Microfiche Papers of Latrobe*, ed. Carter and Jeffrey.
36. At Monticello the terrace decks attached to the house at the enclosed greenhouse space off Jefferson's chamber suite on the south and off the open porch on the north but, basically, from the house floor level. Poplar Forest was like the President's House, where one stepped onto the terrace deck directly from the house, requiring the same floor level.
37. William L. Beiswanger, "Jefferson and the Art of Roofing," *Chronicle of the Early American Industries Association* 58, no. 1 (2005): 18–25, 36. See also the Report on Phase II-C Investigations, 1994, prepared for Poplar Forest by Mesick Cohen Wilson Baker Architects, which documents the various evolutionary construction systems that Jefferson tried for his flat deck supported by a serrated joist system. Jefferson's use of the Palladian wings came with the first Monticello before he experienced Europe, but it had a conventional roof like Palladio's wings. It was not until the President's House occupancy that Jefferson decided to build the upper roof at Monticello and to rebuild the wing roofs with flat terrace decks.
38. Latrobe to Lenthall, September 26, 1803, *Correspondence of Latrobe*, ed. Van Horne and Formwalt, 1:325.
39. This was at Nassau Hall, Princeton. The claim might be exaggerated. See *Correspondence of Latrobe*, ed. Van Horne and Formwalt, 2:86n2.
40. At Monticello the gutter joists directed water into a gutter system that fed cisterns. At Poplar Forest and at the University of Virginia the gutters simply dripped water onto the ground.
41. Latrobe to Lenthall, July 29, 1805, *Microfiche Papers of Latrobe*, ed. Carter and Jeffrey.
42. Jefferson used V-shaped gutters at Monticello, and both V- and U-shaped gutters at Poplar Forest and the University of Virginia.
43. Jefferson to Latrobe, May 23, 1803, *Microfiche Papers of Latrobe*, ed. Carter and Jeffrey.
44. Jefferson to Arthur Brockenbrough, September 1, 1819, Thomas Jefferson Papers, Library of Congress, Washington, D.C., DLC51. In 1825, when asked by his slave joiner John Hemings whether he wanted to put tin over the serrated roof on the main house at Poplar Forest, Jefferson replied that tin "would be a useless expense, because shingles will turn the water as well, and it would be no guard against fire as a plank floor is to be laid over them." Jefferson to John Hemings, August 17, 1825, Jefferson Papers, Coolidge Collection, Massachusetts Historical Society, Boston, record group 12. The Poplar Forest wing's first 1814 serrated roof joists rotted by 1824, and Jefferson commented to a friend that a new method, presumably a U-shaped gutter like that used at the University of Virginia, would be an improvement, perhaps because a U-shaped insert could replace any rot in the future. Jefferson to F. R. Hassler, December 3, 1825, Jefferson Papers, Library of Congress, DLC55.
45. A Jefferson drawing of the section of zigzag roof construction over the student rooms at the University of Virginia shows a curved metal plate that protrudes like a tongue to direct water away from the end of the gutter rather than dripping down the surface. This method was used in the Poplar Forest reconstruction. In his first-century B.C. architectural treatise Vitruvius mentions that lion-head scuppers on ancient temples used protruding tongues for a better drip edge. At the Poplar Forest wing, Jefferson installed a ground drain system on the south side of the wing to direct the dripping water away from the building and toward his plantings and garden to the south.
46. See various historic structure reports by Mesick Cohen Waite and Mesick Cohen Wilson Baker Architects on various pavilions at the University of Virginia.
47. Latrobe to James Madison, March 28, 1812, *Correspondence of Latrobe*, ed. Van Horne and Formwalt, 3:271.
48. Jefferson to Latrobe, April 22, 1805, *Microfiche Papers of Latrobe*, ed. Carter and Jeffrey.
49. Latrobe to Christian I. Latrobe, June 5, 1805, *ibid.*
50. Latrobe to Lenthall, May 4, 1805, *Correspondence of Latrobe*, ed. Van Horne and Formwalt, 2:62.
51. Jefferson to Latrobe, May 11, 1805, *ibid.*, 2:67–68.
52. Jefferson to John Wales Eppes, July 16, 1814, quoted in *Thomas Jefferson's Garden Book, 1766–1826, with Relevant Extracts from His Other Writings*, ed. Edwin Morris M. Betts (1944; reprint, Charlottesville, Va.: Thomas Jefferson Memorial Foundation, 1985), 534.



53. Latrobe to Lenthall, July 8–9, 1805, *Microfiche Papers of Latrobe*, ed. Carter and Jeffrey.
54. This is the opinion of Latrobe scholars Snadon and Fazio, *Domestic Architecture of Latrobe*, and Mills scholar Pamela Scott.
55. These dimensions are written on the original drawing.
56. Different scholars have remarked on this drawing and consider the landscape designs to be Jefferson's even though this drawing is not in his hand. C. Allan Brown first commented on the similarity of Jefferson's design for the White House ornamental landscape with that of Poplar Forest. C. Allan Brown, "Poplar Forest: The Mathematics of an Ideal Villa," *Journal of Garden History* 10, no. 2 (1990): 117–39.
57. Jefferson to Latrobe, May 11, 1805, *Correspondence of Latrobe*, ed. Van Horne and Formwalt, 2:67–68.
58. *Ibid.*
59. *Message from the President of the United States Communicating a Report of the Surveyor of the Public Buildings at the City of Washington, on the Subject of the Said Buildings, December 15, 1806* (Washington, D.C.: A. & G. Printers, 1806).
60. Jefferson to Latrobe, August 5, 1807, *Microfiche Papers of Latrobe*, ed. Carter and Jeffrey.
61. Report of the Committee Appointed to Ascertain the Expenditures and Probable Estimates in Relations to the Public Buildings in the City of Washington, December 21, 1808, available at [loc.gov](#).
62. These photographs are in the Office of the Curator, The White House, Washington, D.C.
63. *Restoration of the White House. Message of the President of the United States Transmitting the Report of the Architects* (Washington, D.C.: Government Printing Office, 1903), copy in the Office of the Curator, The White House.
64. Report of the Committee, December 21, 1808, 11.
65. Report of the Surveyor of the Public Buildings of the United States to the President of the United States, December 11, 1809, 5, available at [loc.gov](#). This report mentions funds expended in the year for "construction of the carriage house."
66. "United States Treasury Department," *Harper's New Monthly Magazine*, 262 (March 1872):481–98; Cohen and Brownell, *Architectural Drawings of Latrobe*, 2:491–92. The definitive architectural history of the Treasury Department is a forthcoming publication by Pamela Scott. I am greatly indebted to her for allowing me to read a draft chapter entitled "'Bemoaning My Cock Sparrow': The Treasury Fireproof, 1804–1808." In this and other ways Scott displayed the generous colleague trait for which she is so well known.
67. Quoted in Scott, "'Bemoaning My Cock Sparrow.'" See also *Correspondence of Latrobe*, ed. Van Horne and Formwalt, 2:34. The most extensive published work to date that treats the Treasury fireproof building is Cohen and Brownell, *Architectural Drawings of Latrobe*, 2:491–96.
68. Latrobe to Lenthall, May 17, 1803, *Correspondence of Latrobe*, ed. Van Horne and Formwalt, 2:66n1.
69. Latrobe to Albert Gallatin, quoted in *ibid.*, 2:64–65n1.
70. Latrobe to Gallatin, October 17, 1806, *ibid.*, 2:275.
71. For this story, see Scott, "'Bemoaning My Cock Sparrow.'"
72. Latrobe to Gallatin, August 20, 1807, and Latrobe to Lenthall, November 21, 1807, *Correspondence of Latrobe*, ed. Van Horne and Formwalt, 2:470, 497.
73. Latrobe to Lenthall, December 31, 1806, *Correspondence of Latrobe*, ed. Van Horne and Formwalt, 2:346–48.
74. Quoted in *ibid.*, 2:321n.25.
75. See *ibid.*, 2:347–48n.1.
76. This author looked diligently for any evidence to support the existence of the east middle pavilion, especially in the unpublished Latrobe letters on microfiche, and found none. This was a period when Latrobe and Jefferson were using the polygraph machine that produced copies of their letters sent; there is a full record of correspondence sent as well as that received for these years, including sequentially numbered letters to Jefferson and Lenthall, and no gaps exist in this correspondence to suggest any loss of letters regarding the pavilions. The Baroness Hyde de Neuville's drawing of 1820 or 1821 shows the east end of the east White House wing in ruinous condition and the west end of the Treasury fireproof in the same condition. It does not imply that the gap between them is the missing pavilion. The drawing is far from accurate, showing wings that are out of proportion with the actual space between the White House and its flanking buildings. Likewise, the west wing is shown halfway to the War Department, when it was in reality only one-quarter of the way. The number of arched windows is also incorrect on the wings, leading one to conclude that it is fanciful in addition to whatever truth it shows in other buildings. It is possible that the ruinous end of the Treasury fireproof shows its conversion in 1820 from the burned ruins into a smaller structure that served as a toolshed.
77. Jefferson to Elbridge Gerry, May 13, 1797, quoted in Richard B. Bernstein, *Thomas Jefferson* (New York: Oxford University Press, 2005), 158.
78. Report of the Surveyor of the Public Buildings of the United States to the President of the United States, December 11, 1809, 5, 8–9, available on the web at Early American Imprints, II, Shaw and Shoemaker, 1801–19.
79. See Travis McDonald, "The Private Villa Retreat of Thomas Jefferson," *White House History*, no. 18 (spring 2006): 4–23. See also Brown, "Poplar Forest."
80. William Seale, *The White House Garden* (Washington, D.C.: White House Historical Association, 1996), 30–31.
81. C. M. Harris, "The Politics of Public Buildings: William Thornton and President's Square," *White House History* no. 3 (Spring 1998): 46–59.
82. The Report of the Committee on the Public Buildings, January 7, 1819, stated: "The offices to the President's house are so small, and inconvenient, as to induce the committee to recommend an addition to be made to the office west of said house." In his December 28, 1818, report to Samuel Lane, commissioner of public buildings, James Hoban provided the estimate for "extending the Colonnade Building, West of the President's House, 60 feet, to admit of Stables, Carriage House, Granary, &c." Both reports are available on the web at Early American Imprints, II, Shaw and Shoemaker, 1801–19.
83. Report of the Committee on the Public Buildings, January 7, 1819.
84. Seale, *President's House*, 171, mentions that Hoban was again brought back to the White House in 1829 during Andrew Jackson's term to consider a revised or new coach house and stables on the end of the west wing. This idea was dismissed in favor of a new stables farther removed from the house on the west.
85. The West Wing in size and location actually gives a good indication of the scale of the intended middle pavilions, as does the East Wing addition.
86. See William B. Bushong, "Lorenzo Simmons Winslow: Architect of the White House, 1933–1952," *White House History*, no. 5 (Spring 1999): 23–32.
87. The Truman renovation photographs are in the Office of the Curator, The White House.
88. Quoted in Seale, *White House*, 172.
89. *Restoration of the White House. Message of the President of the United States Transmitting the Report of the Architects*, 20. This obscure reference to Jefferson as an architect might be one of the first public acknowledgments, as Kimball's monumental monograph that revealed Jefferson's rich architectural contributions would not come out until 1916.
90. John F. Kennedy, April 29, 1962, John F. Kennedy Presidential Library and Museum website, [www.kennedylibrary.org](#).
91. Seale, *President's House*, x.



# **EXHIBIT E**

**PRESS ROOM : BACKGROUNDS**

# East Wing Fact Sheet

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- ★ 1805 – Construction began on two one-story colonnades extending east and west from the White House on the footprint of what would become the modern East and West Wings. President Thomas Jefferson worked with architect Benjamin Henry Latrobe to design the colonnades, and based them off similar dependencies at his plantation, Monticello. The colonnades were designed to blend into the gradual slope on which the White House was built to hide them from view when standing in front of the White House. The ambitious original plans were for the colonnades to connect the White House to the Treasury Building and the executive offices, but excessive cost and political pressure forced Jefferson to scale back his plans. <sup>1</sup>
- ★ 1808 – When construction of Jefferson’s colonnades was completed in 1808, they did not connect to any other buildings and instead served primarily as storage and workspaces for White House domestic staff, including enslaved workers. The East Colonnade also housed a smokehouse for meats, a privy or bathroom, servants’ quarters, a henhouse, and stables. <sup>2</sup>
- ★ 1866 – After the original East Colonnade built under President Jefferson became dilapidated, President Andrew Johnson ordered it torn down. <sup>3</sup>
- ★ 1902 – President Theodore Roosevelt ordered the construction of the East and West Wings. While the West Wing housed offices for the president’s staff, the East Wing primarily served as a receiving area for visitors and guests attending functions at the White House. It featured a circular driveway with a porte cochère where guests would drive their carriages up to the entrance and a coat room known as “the

- ★ 1942 – President Franklin D. Roosevelt expanded the East Wing’s footprint and added a second story. He originally intended it to house a White House museum, but the space became filled with offices and support staff. During the expansion, an underground bomb shelter was constructed as the United States had recently entered World War II. President Roosevelt also converted a room previously used as a coat room into a movie theater.<sup>5</sup>
- ★ 1965 – First Lady Lady Bird Johnson dedicated the Jacqueline Kennedy Garden in honor of the former first lady. The garden, adjacent to the East Wing and Colonnade, was designed by Rachel “Bunny” Mellon, who also designed the Rose Garden outside the Oval Office during the John F. Kennedy presidency and intended the two gardens to complement each other.<sup>6</sup>
- ★ 1977 – First Lady Rosalynn Carter moved her office to the East Wing, becoming the first presidential spouse to have her own office there. A year later, Congress passed the White House Personnel Authorization Act, creating the official Office of the First Lady. Since then, all first ladies and their staff have worked in the East Wing.<sup>7</sup>
- ★ 2025 – On July 31, 2025, the White House announced plans for construction to begin on a new Ballroom, citing the need to host major functions for world leaders, dignitaries, and guests. The White House stated: "The site of the new ballroom will be where the small, heavily changed, and reconstructed East Wing currently sits." White House public tours were closed by September, and demolition of the East Wing began on October 20. Two days later, the White House Historical Association announced that it had supported efforts to digitally preserve the East Wing and Jacqueline Kennedy Garden with comprehensive scanning and photography projects.

## Additional Reading:

- ★ The Office of the First Lady: The Evolution of the East Wing Staff
- ★ White House in Bloom
- ★ The Ever Changing White House





Preservation of the White House



"A Beautiful Spot Capable of Every Improvement" - White House Historical Association

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### **MEDIA CONTACTS**

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For all media inquiries, contact [press@whha.org](mailto:press@whha.org).

### **ABOUT THE WHITE HOUSE HISTORICAL ASSOCIATION**

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Case 1:25-cv-04316 Document 2-9 Filed 12/12/25 Page 5 of 5

First Lady Jacqueline Kennedy envisioned a restored White House that conveyed a sense of history through its decorative and fine arts. She sought to inspire Americans, especially children, to explore and engage with American history and its presidents. In 1961, the nonprofit, nonpartisan White House Historical Association was established to support her vision to preserve and share the Executive Mansion's legacy for generations to come. Supported entirely by private resources, the Association's mission is to assist in the preservation of the state and public rooms, fund acquisitions for the White House permanent collection, and educate the public on the history of the White House. Since its founding, the Association has given more than \$115 million to the White House in fulfillment of its mission.

To learn more about the White House Historical Association, please visit  
[WhiteHouseHistory.org](https://www.whitehousehistory.org).



# **EXHIBIT F**



RUBENSTEIN CENTER SCHOLARSHIP

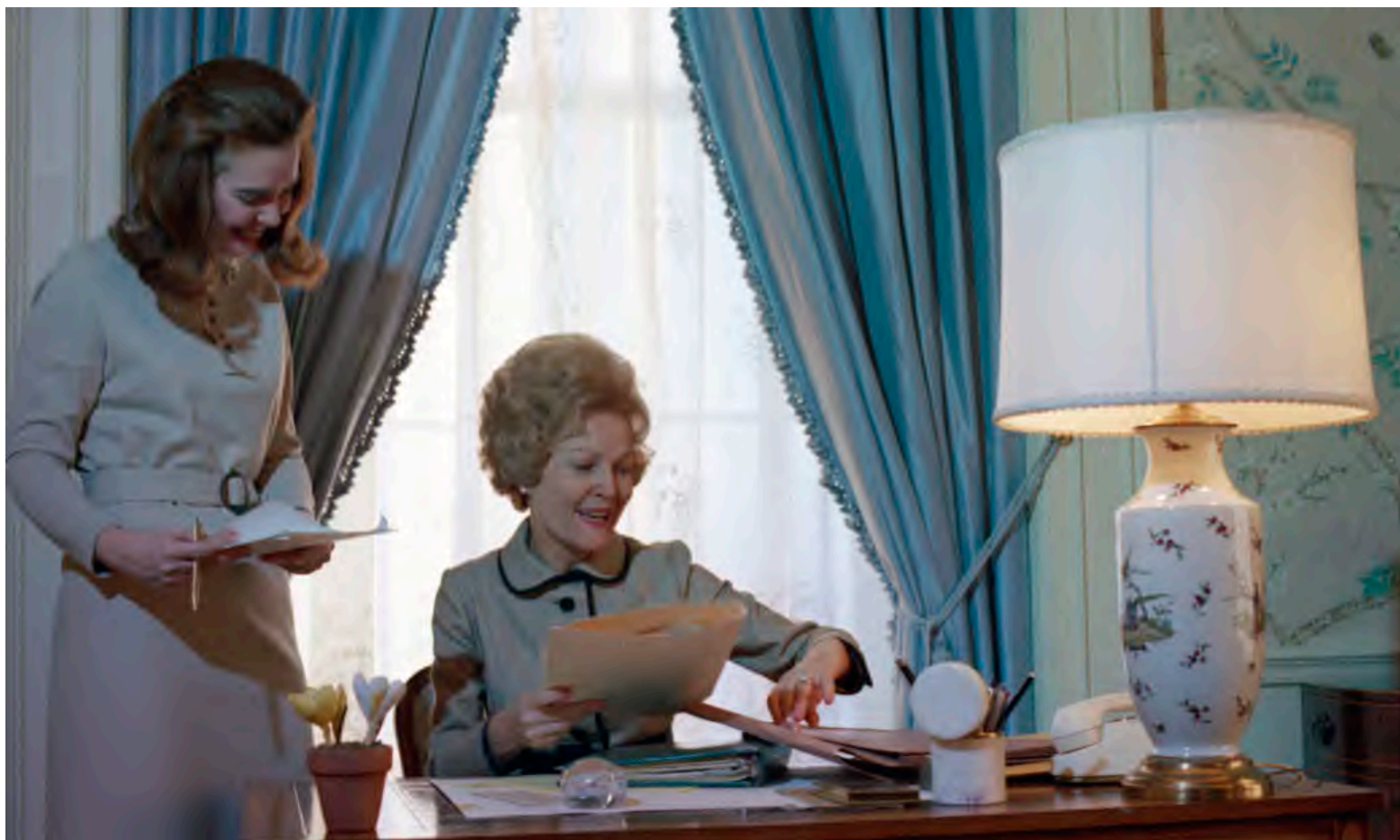
# The Office of the First Lady: The Evolution of the East Wing Staff

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ELIZABETH REES

*Research Fellow*

WHEN FIRST LADY PAT NIXON'S OUTGOING CHIEF OF STAFF and Press Secretary Constance Stuart sat for her White House exit interview in 1973, Stuart stated that "there isn't a reader in America who really wants to know all the details of how this staff operates."<sup>1</sup> Since Stuart's declaration, historians have become more interested in the role played by first ladies in the public life of the nation. Taking their name from the area of the White House in which they operate, the East Wing staff have become a key component of the institution of the modern presidency. Historically a largely female staff, the women of the East Wing have long been behind the staging of events at the White House, as well as facilitating and executing first lady projects throughout the twentieth century. Recent research into the evolution of the East Wing staff has sought to question how the Office of the First Lady came to exist as an official organizational entity within the broader executive staff structure. Who were the women of the East Wing staff? And how did the Office of the First Lady come to exist formally in the late 1970s? Such questions shed light on a lesser-known story of women working at the heart of the White House and enhance our understanding of the development of the first lady's role.



This photograph shows East Wing Staff Director and Press Secretary Constance Cornell Stuart assisting First Lady Pat Nixon at her desk on the Second Floor of the White House on December 30, 1970.

WHITE HOUSE PHOTO OFFICE COLLECTION, RICHARD M. NIXON PRESIDENTIAL LIBRARY AND MUSEUM/NARA

During Theodore Roosevelt's presidency, Isabella Hagner was appointed as social secretary in 1901 to work under the direction of First Lady Edith Roosevelt. While this was a new addition to the White House staff, it was quite common for high-profile, affluent women in Washington, D.C. to employ female secretaries. Typically, these women were well-educated, well-connected, single young women who fit seamlessly into the elite networks within which they operated. They were Washington insiders who had the social and political knowledge necessary to thrive in their roles, although most left their positions once they married.



Portrait of Isabella Hagner, the first White House Social Secretary who started serving in 1901, from the collection of the Hagner Family.

COLLECTION OF THE HAGNER FAMILY

During Taft's presidency, beginning in 1909, Hagner was replaced by Alice Blech. Blech already had experience as a government employee, having worked previously as an attaché at the Bureau of American Republics.<sup>2</sup> Her appointment had been a competitive process, beating a number of other applicants to the position, and her role primarily consisted of stenographic duties under First Lady Helen Taft.<sup>3</sup> Hagner consolidated the role she had carved out for herself when she returned during the Woodrow Wilson presidency, before being replaced by Edith Benham (later Benham Helm). The daughter of U.S. Naval Admiral Andrew E. K. Benham, she went on to serve a remarkable tenure as social secretary throughout the presidencies of Woodrow Wilson, Franklin D. Roosevelt, and Harry Truman. Testament to the social secretary's proximity to presidential power, Benham traveled with the president and First Lady Edith Wilson to the Paris Peace Conference in 1919 at the end of the First World War. In 1930, Mrs. Benham Helm published a series of articles in *Cosmopolitan Magazine* about her experiences with the Wilsons at the Conference much to the delight of her later employer Eleanor





This photograph shows Edith Benham Helm sitting at a desk with two male members of staff on the Second Floor of the White House in 1918.

WHITE HOUSE HISTORICAL ASSOCIATION

The role of social secretary remained seemingly unchanged through the following presidencies, primarily assisting the incumbent first lady with personal administration and the staging of social events at the White House. Appointees to the role continued to be plucked from the higher socio-political echelons with Laura Harlan, daughter of Supreme Court Associate Justice John M. Harlan, serving under First Lady Florence Harding.<sup>5</sup> Through the early twentieth century, the work of the social secretary was largely undertaken from the Second Floor of the Executive Mansion. In the Coolidge years, the *Washington Post* explained that the incumbent secretary Mary Randolph “has presided over the small office of Mrs. Coolidge at the Treasury end of the long corridor on the second floor of the White House with great efficiency and tact,” indicating that the first lady’s staffers still operated out of the first family’s quarters rather than having their own dedicated office space.<sup>6</sup> Although the East Terrace was initially constructed during the renovations by Theodore Roosevelt to serve primarily as the main social entrance to the White House, the East Wing building was not erected as the permanent structure seen today until the Franklin D. Roosevelt’s presidency.

By the 1930s, first ladies began taking on additional staffers to assist with their expanding role as a public figure and patron, with Lou Hoover bringing in additional secretaries to the staff to assist with her involvement with the Girl Scouts. This expanded staffing situation led the press

to refer to the first lady's "secretariat," recognizing for the first time an organization of women working under the direction of the first lady within the executive establishment, specifically for her.<sup>7</sup> Moreover, one of the most famous first ladies to have occupied the White House, Eleanor Roosevelt, similarly brought in a large staff to assist in her expanding role, including the veteran Edith Benham Helm, as well as her long-time secretary and friend Malvina Thompson. Thompson worked as a secretary for Mrs. Roosevelt during the Al Smith Gubernatorial campaign of 1922 and traveled extensively with Mrs. Roosevelt across the country, assisting with her civic and political engagements as the wife of a prominent Democrat and the scion of an important American dynasty.<sup>8</sup> Mrs. Roosevelt's own growing role and recruitment of additional staffers occurred against the backdrop of the expansion of the presidential bureaucracy that took place under her husband's administration: the Executive Office of the President was only just being established in 1939 as the infrastructure of the presidency was reshaped.<sup>9</sup>

Not only was Mrs. Roosevelt the longest serving first lady, but she is also widely recognized by historians as being the standard against which all other first ladies have since been measured due to her transformation of the public role of the first lady. While some contemporaries believed she should be more of a "traditional" first lady, Eleanor set a new course and standard. Her activism on behalf of African Americans, women, immigrants, and working-class Americans is unmatched and indeed, her example would be emulated by later first ladies in championing causes including women's rights in the mid-twentieth century. And so, while the staffing of the first lady's operations had evolved in a relatively informal manner, by the later decades of the first half of the twentieth century conventions had become entrenched relating to the profile of women recruited to serve the first lady. As the landscape of the presidential bureaucracy continued to develop, so did the role of the first lady and the position of her staffers within the executive establishment.



This photograph, taken on April 1, 1941, shows First Lady Eleanor Roosevelt sitting in front of a fireplace, accompanied by her staffers Malvina Thompson and Edith Helm at the White House in Washington, D.C.

FRANKLIN D. ROOSEVELT PRESIDENTIAL LIBRARY & MUSEUM/NARA

Although the first lady's staff had grown to include more than one secretary working under her direction and multiple clerical assistants by the mid-twentieth century, specialization of staff roles had not yet taken place. Bess Truman had the help of an additional secretary, Raethel Odum, who "shared with Mrs. Helm the responsibility of disseminating White House news of special interest to women."<sup>10</sup> Newspapers already referred to the first lady's social secretary as her official spokesperson in their coverage, despite the fact that the role of press secretary had not yet been officially designated on the staff. During the Eisenhower years, Mary Jane McCaffree was interchangeably referred to as "Mrs. Eisenhower's news secretary" and as the social secretary in coverage by the *Washington Post*.<sup>11</sup> With the increasing demands for news coverage that came with the rise of mass media by the mid-twentieth century, the first lady's staff adapted to meet the new demands on the office.





This photograph taken by Abbie Rowe on August 11, 1948, shows Social Secretary Reathel Odum working at her desk in the White House surrounded by papers, typewriters and telephones.

NATIONAL PARK SERVICE, ABBIE ROWE, COURTESY OF HARRY S. TRUMAN PRESIDENTIAL LIBRARY AND MUSEUM/NARA

The Kennedy era marked a turning point for the first lady and for the East Wing staff. The glamorous, young, new First Lady Jacqueline Kennedy was, as journalist Helen Thomas remembered, “front page news every day.”<sup>12</sup> As such, it became necessary for the East Wing to devote more of its organization towards handling the press. This resulted in the appointment of Press Secretary Pamela Turnure working under the direction of incumbent Social Secretary Letitia Baldrige, operating out of their dedicated office space in the East Wing. While many previous first ladies often supported charitable causes and their husband’s own domestic policy initiatives, the Kennedy administration’s activities consolidated the notion of a first lady project. Mrs. Kennedy’s restoration project, preserving Lafayette Square, conducting a televised tour of the White House, and establishing the White House Historical Association, was a landmark initiative which transformed the role of the first lady as a public figure. These projects also required a fully engaged staff in the East Wing to assist in the execution of these activities,

Staff structure and political development continued throughout the following administrations, with the unit growing as the public role of the first lady expanded and became increasingly political. Lady Bird Johnson passionately championed environmentalism in her beautification program, which found real political impact through the passage of the 1965 Highway Beautification Act, otherwise known as “Lady Bird’s Bill.” This project required recruitment of additional specialized staffers to the East Wing staff, with Sharon Francis brought over from the Department of the Interior to assist with beautification correspondence and planning. The Johnson years saw an increasing degree of professionalization more generally in the staff, with Liz Carpenter being the first former professional newspaperwoman appointed to the role of press secretary in the East Wing. In addition, the significance of new forms of mass media was clear with the appointment of Simone Poulain on the Johnson staff in the specific role of television and radio advisor on the press staff, further indicating greater specialization of the staff roles.

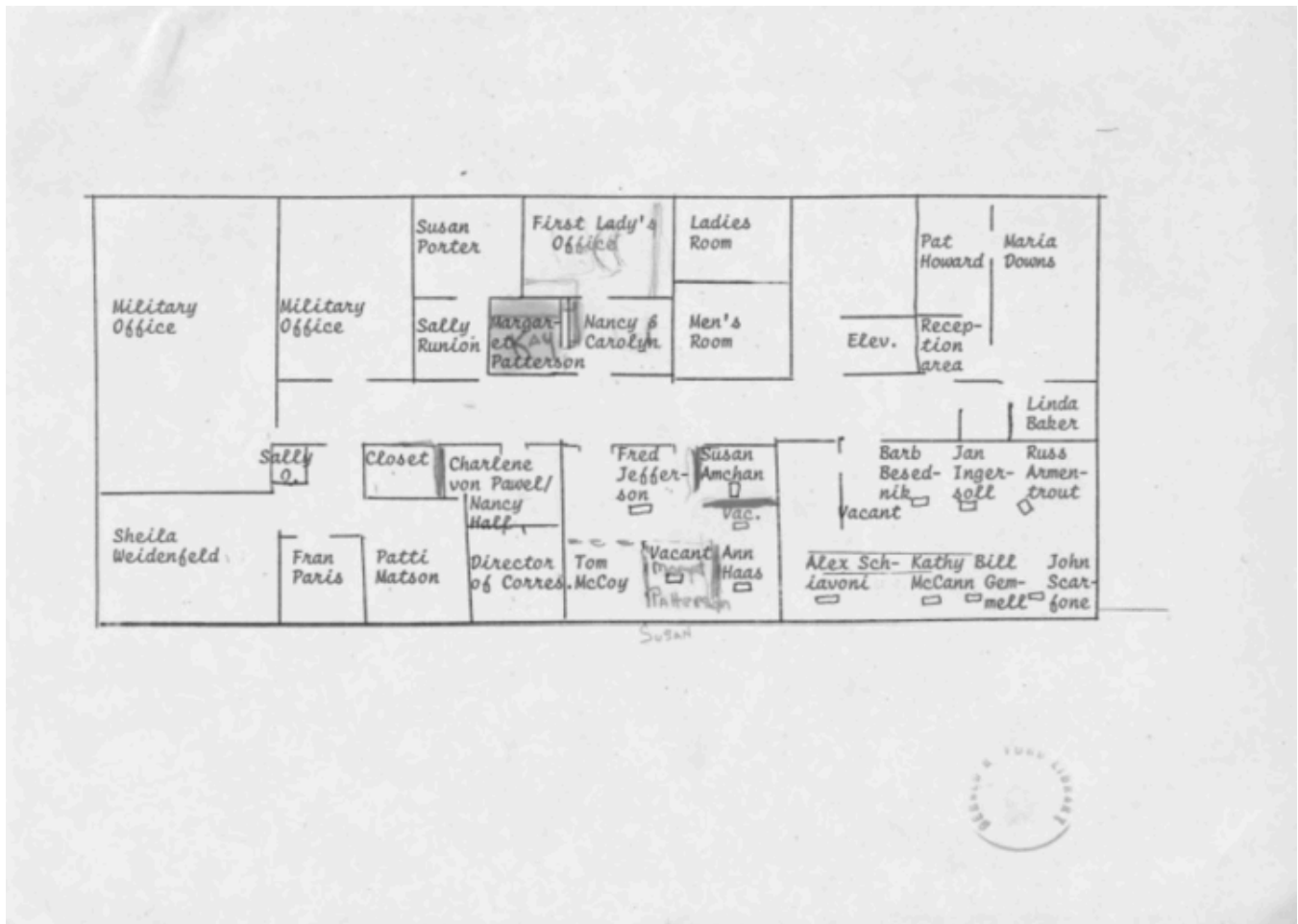


This photograph, taken by President Johnson’s official photographer Yoichi Okamoto on January 17, 1969, shows from left to right Press Secretary Liz Carpenter, First Lady Lady Bird Johnson, Social Secretary Bess Abell and Personal Secretary Ashton Gonella gathered for a staff meeting on the Second Floor of the White House.

During Richard Nixon's presidency, the unit professionalized further still with the addition of a director of press relations and a press coordinator, as well as the radio and television coordinator, all working under Constance Stuart as press secretary. The expanding Nixon staff even included a projects coordinator for a short period of time as the organizational structure was adapted to facilitate the increasing volume of activity undertaken by first ladies of this period. The Nixon era saw a real attempt on the part of the administration to bring more women into government roles, with Barbara Franklin appointed as a Staff Assistant to the President with the express aim of promoting the position of women in government work. At the same time though, the Nixon presidency was a period of particularly tense relations between the East and West Wing staffs. Chief of Staff H. R. Haldeman had a direct hand in appointing Constance Stuart to her position and attempted to keep a close eye on the activities of the East Wing staff, sending extensive unsolicited feedback to the women on their activities on a regular basis. Eventually, to avoid staff confrontation, during Gerald Ford's presidency strategies were drawn up between the East and West Wings to model the East Wing staff as an operational counterpart to the West Wing.

In the aftermath of the Watergate scandal, Betty Ford inherited the East Wing organization and continued to operate within this framework for a short period of time, before making her own changes to the staff. Mrs. Ford acted as her own staff director, taking a more active hand in the running of her own staff, and reorganizing the East Wing offices to allow herself space for an office of her own amongst her team. Moreover, Ford continued to promote professional women with careers in the media and government to her staff. Press Secretary Sheila Weidenfeld had been a successful television producer, and Social Secretary Maria Downs served as a staff assistant on the Goldwater for President Committee in 1964, before undertaking roles variously at the Republican National Committee and as the executive director at the Women's National Press Club. More than a social operation then, by this point the first lady ran a well-oiled political machine, staffed by professional career women with specific skills and experiences. As the East Wing staff began to push the boundaries of their traditional duties, with Mrs. Ford and her staffers becoming increasingly vocal in their support of the Equal Rights Amendment as the contemporary feminist movement of the 1970s came to dominate public discourse, the West Wing staff sought to better coordinate to make sure that the two entities acted as one unified body. Suggesting a system for coordinating the two wings as organizational counterparts, presidential aide Bradley H. Patterson Jr. reminded both parties that "the East Wing, the West Wing and the EOB are a single staff family."<sup>13</sup>





This digitized document from the Ford era is undated but shows the potential plan for the layout of the East Wing offices, including an office for First Lady Betty Ford. The document is evidence of the planning that went into the rearrangement of the East Wing staff offices during the Ford era.

GERALD R. FORD PRESIDENTIAL LIBRARY/NARA

These organizational changes within the East Wing staff came to a head during Jimmy Carter's presidency. By this point, the basic blueprint for the contemporary staff was largely established and these arrangements were finally formalized by the provision of assistance for the spouse of the president through the 1978 White House Personnel Authorization Act. Together with Rosalynn Carter's reorganization of the staff, the organizational entity as we recognize it in the twenty-first century was formalized, consolidating decades of convention.<sup>14</sup> Although the first lady's staff has been evolving since 1901 and the appointment of Isabelle Hagner, the administrations between 1961 and 1976 through the tenures of Jacqueline Kennedy, Lady Bird Johnson, Pat Nixon and Betty Ford saw a constant trajectory of intense staff evolution, specialization, and professionalization which produced the modern East Wing staff.

Not only does this research tell the stories of key women who made the increasingly public activity of first ladies possible in the mid-twentieth century, but many of these women were themselves feminist-oriented thinkers. As the contemporary women's movement of the 1960s grew, high profile East Wing women such as Johnson Press Secretary Liz Carpenter advocated for improvements for the position of women in public life from their position behind-the-scenes but close to the power of the presidency. Into the 1970s, Betty Ford Rosalynn Carter and their staffs lobbied for the passage of the Equal Rights Amendment which prohibited sex-based discrimination. The history of the growth of the East Wing staff is also, therefore, intertwined with the story of women in political life more broadly and thus in some ways acts as a very specific microcosm reflecting the wider social changes related to gender and women's status in the mid-twentieth century. Incorporating an understanding of how the women of the East Wing staff contributed to the development of the Office of the First Lady is arguably an essential addition to narratives of modern presidential history for a more complete picture of how women operated within the Executive Office of the President. And so, whilst Constance Stuart may have felt that there was limited public interest in how the East Wing staff operated when she left the White House in 1973, uncovering the story of how the first lady's staff operated and evolved reveals significant new insight into experiences of women working within the modern presidency.

### **About the Author**

Elizabeth Rees served as a 2023-2024 Research Fellow in the David M. Rubenstein National Center for White House History. She is a DPhil candidate at the University of Oxford's Rothermere American Institute. She received her MA in U.S. Studies from University College London in 2019, and her BA in English Literature and History from the University of Exeter in 2018. Elizabeth's project investigates the emergence of the modern East Wing staff and Office of First Lady between the administrations of 1961-1976. In this transformative era, the East Wing staff developed into a professionalized unit and emerged as an organizational counterpart to the West Wing. Likewise, her research shows how the East Wing staff acted as a microcosm for the contemporary socio-political changes relating to gender, women in work, and the emerging feminist movement. She has also taught on classes related to race and civil rights, as well as the Ronald Reagan presidency and the AIDS crisis.

*See Footnotes & Resources*

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*Keep Looking?*

# **EXHIBIT G**

# *A Look Back at the White House East Wing*

The East Wing had been a base for the first lady, an entryway for social functions and an emergency bunker.

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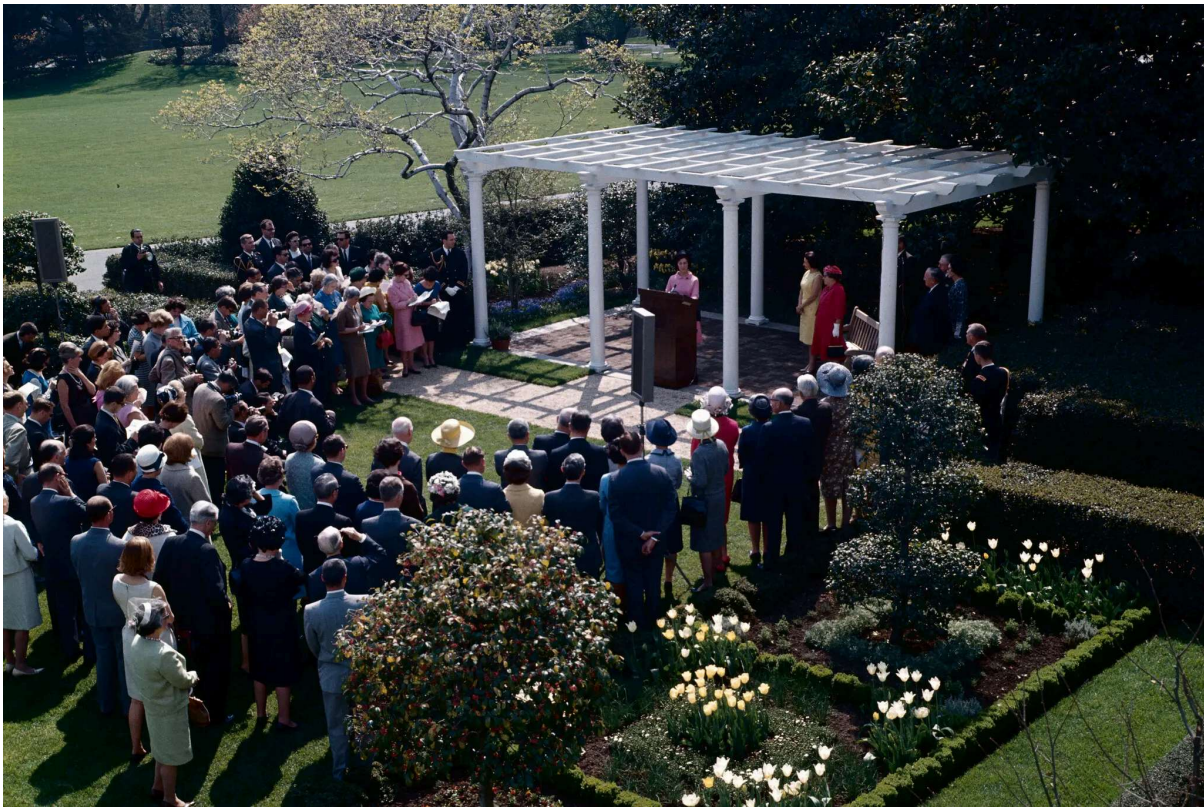
**By Ashley Ahn**

Oct. 22, 2025

The East Wing of the White House, which will be torn down by this weekend to make way for President Trump's new ballroom, has been a formal entryway, the site of social functions and a base for the first lady since Eleanor Roosevelt's time.

The two-story wing, whose demolition has provoked outrage and alarmed historians and architects, was built under President Theodore Roosevelt in 1902, when it was called the East Terrace, and then rebuilt during Franklin D. Roosevelt's presidency to conceal a new underground emergency bunker. It also housed additional White House staff and offices and provided an entrance for guests during events.





Lady Bird Johnson dedicated the Jacqueline Kennedy Garden. Bettmann — Corbis, via Getty Images

The East Wing also included the president's theater and a covered walkway called the East Colonnade that connects to the main residence, and the Jacqueline Kennedy Garden, just south of the colonnade. The garden, sometimes referred to as the East Garden or the First Lady's Garden, had served as a location for outdoor receptions.



An undated photo of the president's theater in the East Wing. Jack E. Boucher/Historical American Buildings Survey, via Library of Congress

Directly below the East Wing lies the Presidential Emergency Operations Center, a bombproof underground bunker for the president that was built during World War II at the same time as the modern East Wing. It was unclear whether the ballroom construction would affect the bunker.

Vice President Dick Cheney was hustled to the bunker after the Sept. 11 terrorist attacks. Mr. Trump was rushed there, too, during protests in 2020.

Lorenzo Winslow, the White House architect in the 1930s, designed and oversaw the construction of the East Wing and the bunker, as well as other features of the modern-day White House, including the balcony and major interior reconstruction during Harry Truman's presidency.

The East Wing's wartime reconstruction was met with fierce backlash as Republicans called the expenditure wasteful, according to the White House Historical Association.





Jacqueline Kennedy showed Empress Farah, wife of the Shah of Iran, the White House grounds in 1962. Bettmann

But its utility quickly quelled criticism.

By the 1930s, Eleanor Roosevelt began employing more staff members as the first lady became a more public figure, using the East Wing for official functions and news conferences.

As media attention on the first lady exploded during the Kennedy era, Jacqueline Kennedy expanded her East Wing operations to include a press secretary and other staff. An office formally dedicated to the first lady was planned under Betty Ford and opened under Rosalynn Carter in 1977, according to the White House Historical Association.





The East Wing entrance adorned with Christmas decorations last year. Haiyun Jiang for The New York Times

The eastern part of the White House has been evolving since the structure's earliest days.

In the early 1800s, President Thomas Jefferson added the East Colonnade along with a matching colonnade and terrace on both sides of the main residence to serve as connections to service buildings. The original East Terrace was removed in 1866 and rebuilt in 1902 to serve as the main entrance for social events.

This precursor to the modern East Wing included a coat room, gallery and a circular driveway for guests as they passed from carriages into the elegant corridor, according to the White House Historical Association.

“Betty Ford had the best quote for how special the East Wing is: ‘If the West Wing is the mind of the nation, then the East Wing is the heart,’ Anita McBride, who was chief of staff to Laura Bush when she was first lady, told East Wing Magazine. “The walls may be gone, but those East Wing stories must be preserved and shared for future generations.”

***A correction was made on Oct. 27, 2025: Because of an editing error, a picture caption misstated the location on the White House grounds. Jacqueline Kennedy showed Empress Farah, wife of the Shah of Iran, the White House grounds near the East Colonnade in 1962.***

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When we learn of a mistake, we acknowledge it with a correction. If you spot an error, please let us know at [nytnews@nytimes.com](mailto:nytnews@nytimes.com). [Learn more](#)

**Ashley Ahn** covers breaking news for The Times from New York.

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A version of this article appears in print on , Section A, Page 11 of the New York edition with the headline: ‘Heart’ of the Nation: The East Wing’s History

# **EXHIBIT H**



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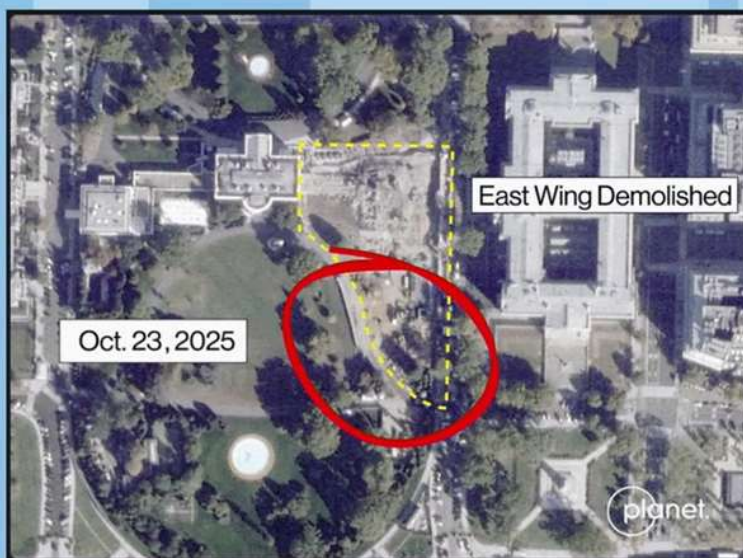
Stream on

## White House East Wing demolished, new images appear to show

The structure was torn down to make way for Trump's \$300 million ballroom.

By [Alexandra Hutzler](#) and [Isabella Murray](#)

October 23, 2025, 10:05 PM



### HISTORIC TREES CUT DOWN FOR WHITE HOUSE BALLROOM

**White House East Wing demolished, new images appear to show** President Donald Trump first said the project wouldn't interfere with the existing White House, but on Thursday satellite images appeared to show the entire East Wing reduced to rubble.

New images available Thursday appear to show the entire White House East Wing has been demolished to make way for President Donald Trump's \$300 million ballroom.

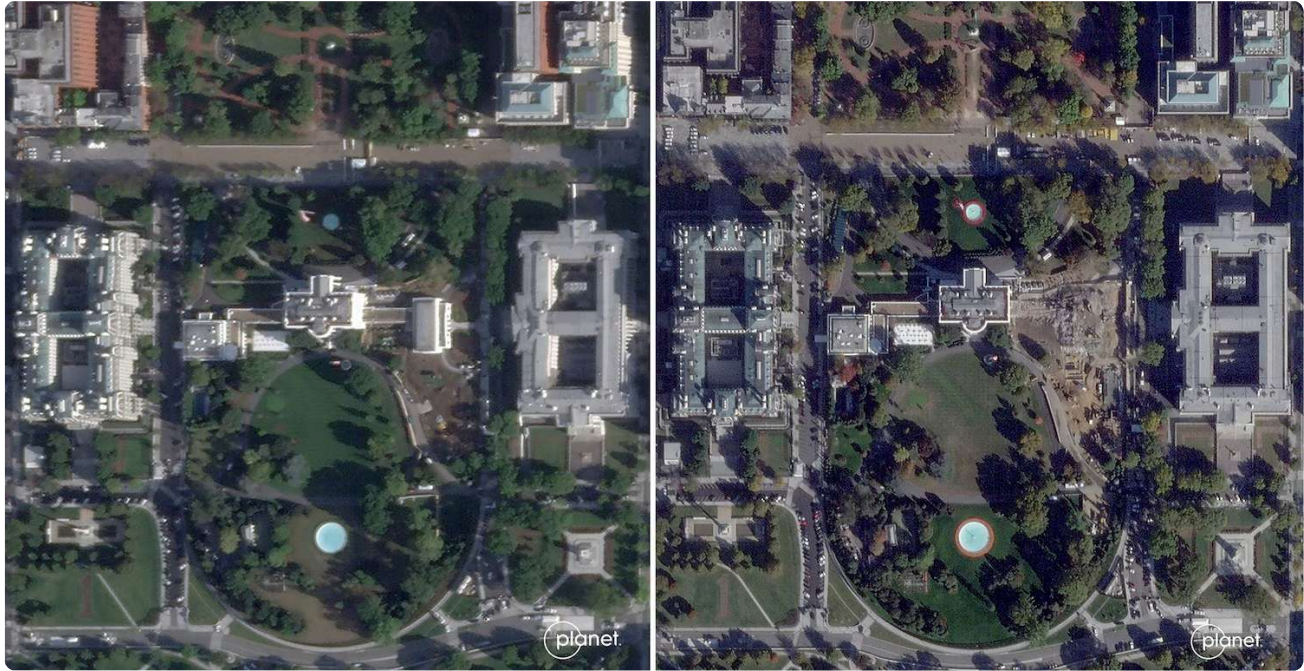
White House press secretary Karoline Leavitt defended the demolition as she faced questions from reporters at Thursday's briefing.

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**Could the demolition of the White House's entire East Wing have been stopped?→**

Trump initially said in July that the project would not interfere with the existing White House structure. Then this week, as crews began to raze the East Wing, an official said the "entirety of the East Wing will be modernized" as the massive 90,000 square foot ballroom is built.

By Thursday, satellite images from Planet Labs PBC showed the East Wing reduced to rubble.



The East Wing of the White House (L) in a satellite photo captured by Planet Labs PBC on Sep 26, 2025 along with a photo captured on Oct. 23, 2025.

Planet Labs PBC





Work continues on the demolition of a part of the East Wing of the White House, Oct. 23, 2025, in Washington, before construction of a new ballroom.

Jacquelyn Martin/AP

"This is the People's House. Why not inform the public of that change and when it was decided that the East Wing would have to be demolished?" ABC News Chief White House Correspondent Mary Bruce asked Leavitt.

"With any construction project, changes come. And we have informed all of you, we've been keeping you apprised of this project. We've shown you the renderings," Leavitt said.



"The plans changed when the president heard counsel from the architects and the construction companies who said that in order for this East Wing to be modern and beautiful for many, many years to come, for it to be a truly strong and stable structure, this phase one that we're now in was necessary," Leavitt added.



A dump truck enters a makeshift dump site after dropping soil and debris from the East Wing of the White House at the East Potomac Golf Course in Washington, October 23, 2025.

Jessica Koscielniak/Reuters

Jarring images of the construction prompted a wave of backlash and questions, including whether the demolition [could have been stopped](#) and [who is funding the project](#).

The White House is requiring at least some of the construction workers tasked with demolishing the East Wing to sign non-disclosure agreements barring them from discussing their work, according to a White House official and sources familiar with the project.

A White House official told ABC News that requiring workers to sign NDA's is "standard" practice, given aspects of the project deal with the operational security of the White House.



"There is nothing unusual about requiring workers to sign NDA's and it is standard" the White House official said.

Answering reporters' questions about the project earlier Thursday, Leavitt said: "As for the cost of the ballroom and the construction itself, all of that is going to be, like I've said, privately funded and paid for by the president himself and many generous patriots who have stepped up," Leavitt said. She also said to expect a dollar amount from Trump on how much of his own resources he will be committing to build the ballroom, which he has wanted to do for years.



Debris is seen at a largely demolished part of the East Wing of the White House, Oct. 23, 2025, in Washington, before construction of a new ballroom.

Jacquelyn Martin/AP

Later on Thursday, Trump was asked by ABC's Bruce if he'd raised the full \$300 million to fund the ballroom.

"Yeah. Actually, we've raised I think \$350 million," Trump said. "It's all donor money and money that we put up, we've raised -- it's gonna be, it's gonna cost right in the neighborhood of \$300



million. Its been expanded and made absolutely -- it'll be the most beautiful ballroom anywhere in the world."



In this photo taken from a plane, on Oct. 23, 2025, the East Wing demolition is shown in Washington, D.C.

Katie Harbath



On how much he will spend personally, Trump said: "I won't be able to tell you until I finish, but I'll donate whatever is needed, I'll tell you that."

Asked by ABC White House Correspondent Karen Travers how much of his own money he was planning to donate to the ballroom, Trump replied, "Oh, millions of dollars. Yeah. Well, I also give, you know, I give a lot of money to the White House. The White House is, as you know, I give my salary, and I usually like to steer it to the White House because this house was a little bit abandoned."

As for a possible name for the ballroom, Trump demurred and told reporters he wouldn't get into that at this stage. Leavitt, at her briefing, had said there will be an official name for the ballroom and that Trump would announce it once he decided.



President Donald Trump speaks during a roundtable on criminal cartels in the State Dining Room of the White House, Oct. 23, 2025, in Washington.

Alex Wong/Getty Images

According to a White House official, plans for the ballroom still have not been submitted to the National Capital Planning Commission. Leavitt on Thursday, when asked if the president can tear down anything he wants at the White House, argued they do not need to seek approval to demolish only for vertical construction.

Trump himself, at a dinner for the donors earlier this month, said he was told by "two men" that he could make changes quickly, without approval.

"I said, 'How long would it take?' They said: 'Sir, you can start tonight. You have zero zoning conditions. You have no approvals,'" Trump said at the dinner. "I said, 'You gotta be kidding.' He said, 'Sir, this is the White House. You're the president of the United States. You can do anything you want.'"

*ABC News' Hannah Demissie and Katherine Faulders contributed to this report.*



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# **EXHIBIT I**

**National Park Service**

# The White House and President's Park

District of Columbia

*NPS.gov (<https://www.nps.gov/>) / Park Home (<https://www.nps.gov/whho/index.htm>)**/ Learn About the Park (<https://www.nps.gov/whho/learn/index.htm>)**/ History & Culture (<https://www.nps.gov/whho/learn/historyculture/index.htm>)**/ Gardens (<https://www.nps.gov/whho/learn/historyculture/gardens.htm>) / Jacqueline Kennedy Garden*

## Jacqueline Kennedy Garden

Located south of the East Terrace Colonnade, the Jacqueline Kennedy Garden was designed by Rachel Lambert Mellon, who also redesigned the [Rose Garden](#) (<https://www.nps.gov/whho/learn/historyculture/rose-garden.htm>) for President John F. Kennedy. The planning of the garden started during the Kennedy administration and was finished during the Lyndon B. Johnson administration. The pergola at the west end of the garden was designed by famed architect I. M. Pei. When the garden was formally dedicated in 1965, First Lady Claudia "Lady Bird" Johnson named the garden to commemorate former First Lady Jacqueline Kennedy.



Jacqueline Kennedy Garden (2023)  
*NPS / Kelsey Graczyk*

The current garden has French design elements. Sometimes referred to as the East Garden or First Lady's Garden, a garden has been in this location since 1903 when First Lady Edith Roosevelt created a colonial-style garden here. President Woodrow Wilson's first wife First Lady Ellen Wilson started planning a new garden in the Italian Tuscan style with landscape architect Beatrix Farrand in 1914. The garden design was implemented by President Wilson's second wife First Lady Edith Wilson in 1916.

Historically this garden served as a location for outdoor receptions. From 1994 until 2000, First Lady Hillary Clinton staged eight outdoor exhibitions of American sculpture here.

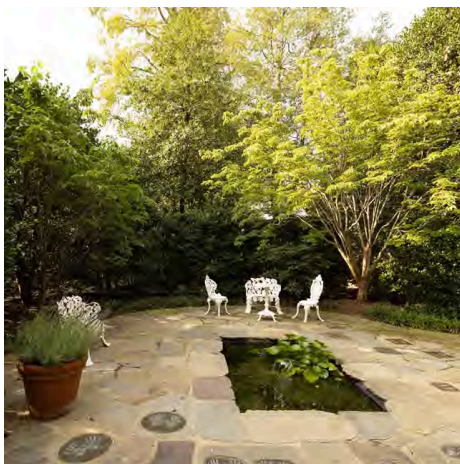




Kennedy Garden (2023)

NPS / Nathan King

## WHITE HOUSE GARDENS



**Children's Garden**

(<https://www.nps.gov/whho/learn/historyculture/children-s-garden.htm>)



**Rose Garden**

(<https://www.nps.gov/whho/learn/historyculture/rose-garden.htm>)



**Kitchen Garden**

(<https://www.nps.gov/whho/learn/historyculture/white-house-kitchen->



The young grandchildren of the President are commemorated with bronze castings of their young handprints.

The current Rose Garden reflects a renovation in 2020 that was initiated by First Lady Melania Trump.

[garden.htm](#)).

The garden provides locally grown vegetables, fruits, and herbs for the first family and White House guests.

## Commemorative Tree Plantings and Gardens at the White House and President's Park



This map shows locations of a wide variety of trees planted by and in honor of presidents of the United States and first ladies from the 1800s to today. The trees are located throughout the grounds surrounding the White House. Several gardens are also on the White House grounds.

Last updated: June 27, 2025

## Was this page helpful?

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202 208-1631



# **EXHIBIT J**

*The* WHITE HOUSE

## BRIEFINGS &amp; STATEMENTS

## The White House Announces White House Ballroom Construction to Begin

The White House

July 31, 2025

**Washington, D.C.** — For 150 years, Presidents, Administrations, and White House Staff have longed for a large event space on the White House complex that can hold substantially more guests than currently allowed. President Donald J. Trump has expressed his commitment to solving this problem on behalf of future Administrations and the American people.

The White House is one of the most beautiful and historic buildings in the world, yet the White House is currently unable to host major functions honoring world leaders and other countries without having to install a large and unsightly tent approximately 100 yards away from the main building entrance. The White House State Ballroom will be a much-needed and exquisite addition of approximately 90,000 total square feet of ornately designed and carefully crafted space, with a seated capacity of 650 people — a significant increase from the 200-person seated capacity in the East Room of the White House.

In recent weeks, President Trump has held several meetings with members of the White House Staff, the National Park Service, the White House Military Office, and the United States Secret Service to discuss design features and planning.

President Trump has chosen McCrery Architects as lead architect, which is well-known for their classical architectural design and based in our nation's capital. CEO Jim McCrery said: "Presidents in the modern era have faced challenges hosting major events at the White House because it has been untouched since President Harry Truman. I am honored that President Trump has entrusted me to help bring this beautiful and

necessary renovation to The People's House, while preserving the elegance of its classical design and historical importance.”

The construction team will be headed by Clark Construction, and the engineering team will be led by AECOM.

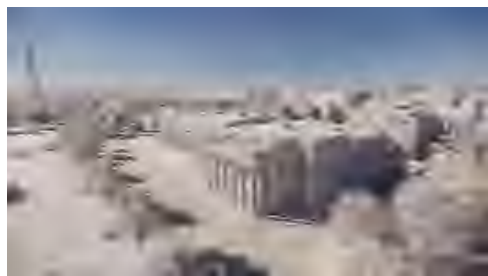
The project will begin in September 2025, and it is expected to be completed long before the end of President Trump's term.

President Trump, and other patriot donors, have generously committed to donating the funds necessary to build this approximately \$200 million dollar structure. The United States Secret Service will provide the necessary security enhancements and modifications.

The White House Ballroom will be substantially separated from the main building of the White House, but at the same time, it's theme and architectural heritage will be almost identical. The site of the new ballroom will be where the small, heavily changed, and reconstructed East Wing currently sits. The East Wing was constructed in 1902 and has been renovated and changed many times, with a second story added in 1942.

The White House Chief of Staff Susie Wiles said the following: “President Trump is a builder at heart and has an extraordinary eye for detail. The President and the Trump White House are fully committed to working with the appropriate organizations to preserving the special history of the White House while building a beautiful ballroom that can be enjoyed by future Administrations and generations of Americans to come.”

The White House will continue to provide the American public with updates on this project at [whitehouse.gov/visit](https://www.whitehouse.gov/visit).







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# **EXHIBIT K**



# *Inside Trump's Push to Make the White House Ballroom as Big as Possible*

President Trump's ever-growing vision has caused tension with contractors. His architect has taken a step back as the president personally manages the project.



Listen to this article · 10:43 min [Learn more](#)



**By Luke Broadwater**

Luke Broadwater is a White House correspondent. He reported from Washington.

Published Nov. 29, 2025 Updated Nov. 30, 2025

As President Trump took a stroll on the White House roof in August, generating headlines and questions about what he was up to, the man walking beside him was little noticed.

Wearing his signature bow tie, James McCrery, a classical architect who runs a small Washington firm known for its work building Catholic churches, was discussing how to execute Mr. Trump's vision for a ballroom on the White House grounds.

Mr. McCrery's work has been embraced by conservatives who believe federal buildings should be designed with an eye toward the grandeur of ancient Greek and Roman structures. He often talks of how his design work is carried out in service of God and the church, according to people who have worked with him.

It might have seemed an odd pairing: a man who designs cathedrals working for a man who once built casinos, and is now president of the United States.

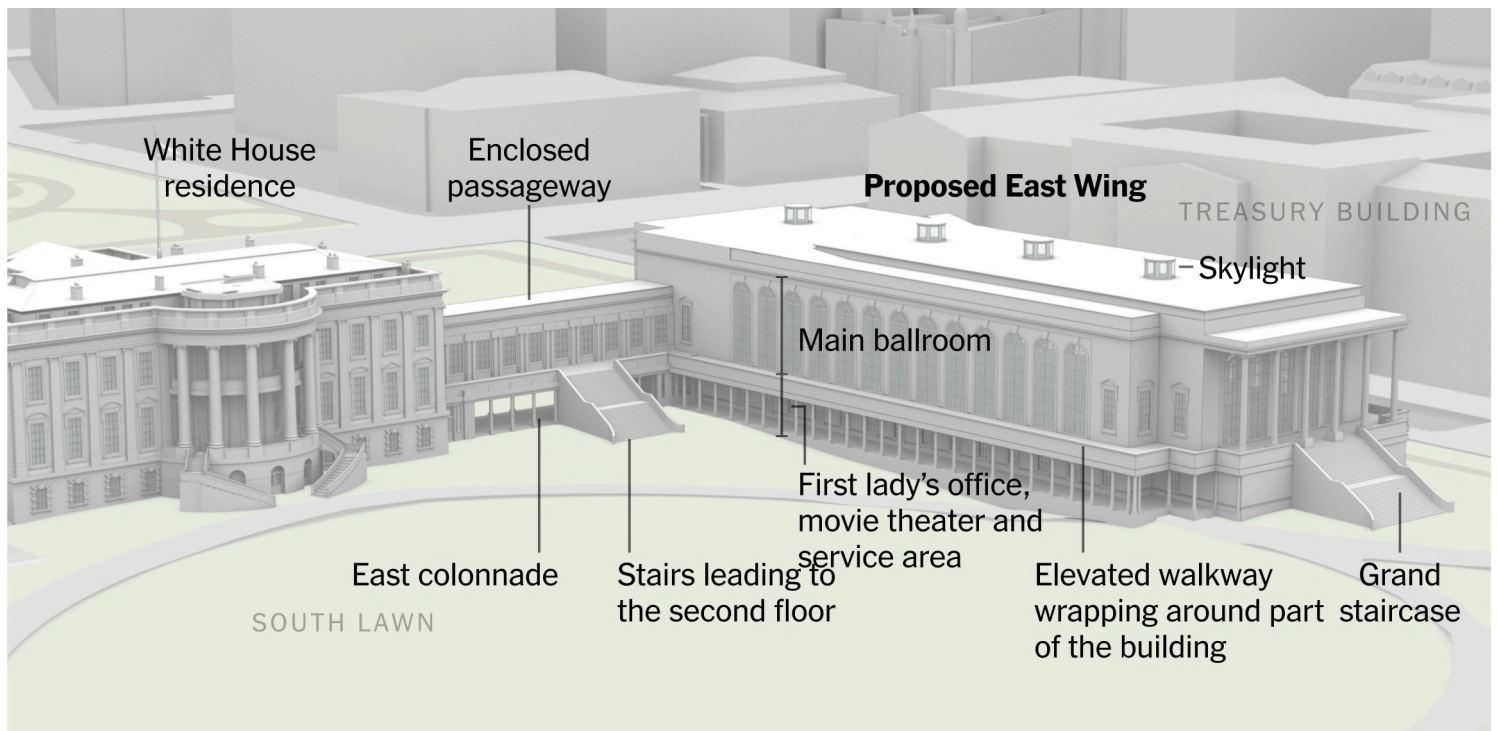
But McCrery Architects got to work on the initial drawings for the project, sketching out a design with high ceilings and arched windows reminiscent of Versailles's Hall of Mirrors. It would have the latest security features, including bulletproof glass. Gold furniture, known to please the president, was added to the renderings.

It was flashy enough to impress a man of Mr. Trump's tastes, while largely matching the style of the historic White House without overshadowing it.

That's when things got tricky.

In offering up his initial design, Mr. McCrery could not have known that Mr. Trump's vision for the project was growing. What started as a 500-seat ballroom connected to the East Wing grew to 650 seats. Next, he wanted a 999-seat ballroom, then room for 1,350. Even as Mr. Trump assured the public in July that the ballroom would not touch the existing structure, he already had approved plans to demolish the East Wing to make way for something that could hold several thousand people, according to three people familiar with the timeline.

The latest plan, which officials said was still preliminary, calls for a ballroom much larger than the West Wing and the Executive Mansion. Mr. Trump has said publicly that he would like a ballroom big enough to hold a crowd for a presidential inauguration.



Note: Rendering is based on a preliminary drawing and images of a model of the proposed East Wing released by the White House. Junho Lee and Lazaro Gamio/The New York Times

The size of the project was not the only issue raising alarms. Mr. Trump also told people working on the ballroom that they did not need to follow permitting, zoning or code requirements because the structure is on White House grounds, according to three people familiar with his comments. (The firms involved have insisted on following industry standards.)

In recent weeks, Mr. McCrery has pulled back from day-to-day involvement in the project, two people familiar with the matter told The New York Times. They emphasized that Mr. McCrery was still involved as a consultant on the design and proud to be working for Mr. Trump.

A White House official acknowledged that there had been disagreements between Mr. Trump and Mr. McCrery, a dynamic first reported by the Washington Post.

Through a representative, Mr. McCrery declined requests for an interview.

This account of Mr. Trump's personal drive to undertake one of the most significant renovations in the history of the White House is based on interviews with five people with knowledge of the project, most of whom asked for anonymity to



discuss private conversations, along with the president's own statements and planning documents released by the White House.

## A Builder's Dream



The president initially considered ways to preserve the East Wing but ultimately decided against those plans and insisted on demolishing the entire East Wing. Doug Mills/The New York Times

For Mr. Trump, who was a builder for years in New York City and who often brags about his talents in real estate and construction, the White House renovation is a dream project.

Mr. Trump has marveled that he does not need to follow the kind of permitting requirements that he faced back in New York. He doesn't need approvals from anyone, he has told those around him, and can begin any project at the White House as quickly as he likes.



“‘You’re the president of the United States, you can do anything you want,’” Mr. Trump has said he’s been told.

Mr. Trump has wanted to build a ballroom at the White House for years. During the Obama administration, he pitched the idea of constructing a \$100 million version of his Mar-a-Lago ballroom. But Obama associates never followed up on his offer, a slight that has stayed with Mr. Trump.

The ballroom Mr. Trump is planning now is more than four times as large as the 20,000-square-foot one at Mar-a-Lago.



The ballroom at Mar-a-Lago before Mr. Trump’s party on the night of the midterm elections in 2022. Josh Ritchie for The New York Times

Aware of potential resistance to the project, Mr. Trump has pushed to remove any obstacle that could slow down his vision.

He has installed his former personal lawyer as the chairman of the National Capital Planning Commission, which is supposed to review plans for the project. That lawyer, Will Scharf, has said there was no need to review Mr. Trump’s plans

before he ordered the demolition of the East Wing.

Mr. Trump has also fired the entire board of the Commission of Fine Arts, an independent federal agency that was established by Congress to advise the president on urban planning and historical preservation.

Mr. Trump's unilateral approach has raised concerns from the Society of Architectural Historians, which urged that "such a significant change to a historic building of this import should follow a rigorous and deliberate design and review process."

Mr. Trump is aware of the criticism that his ballroom plans are too large. He told a group of donors to the project last month that he didn't want the new ballroom to "dwarf anything." But at the same event, in discussing related plans to construct a Triumphal Arch, Mr. Trump showed small, medium and large options.

"I happen to think the large looks by far the best," he said.



## Deep in the Details



Mr. Trump ordered the creation of a ballroom that can hold more than double the amount of people as the initial plans. Doug Mills/The New York Times

The contractors working on Mr. Trump's ballroom — including McCrery Architects, Clark Construction and AECOM — did not go through the traditional government bidding process. Instead, Mr. Trump has been personally selecting each contractor and handling the details of the contracts, including how much the firm will be paid, people with knowledge of the situation said.

Mr. Trump selected Mr. McCrery after the architect made his presentation personally in the Oval Office, emphasizing a design that would be in keeping with the existing White House. (The building's original designer, James Hoban, was also a church architect.)

The president has also said that the firm excavating the site initially told him the work would cost \$3.2 million, but that he pressured the company to accept just \$2 million.

The short timetable for the project, which the president has said he wants to be completed before 2029, has led to some embarrassing mistakes.

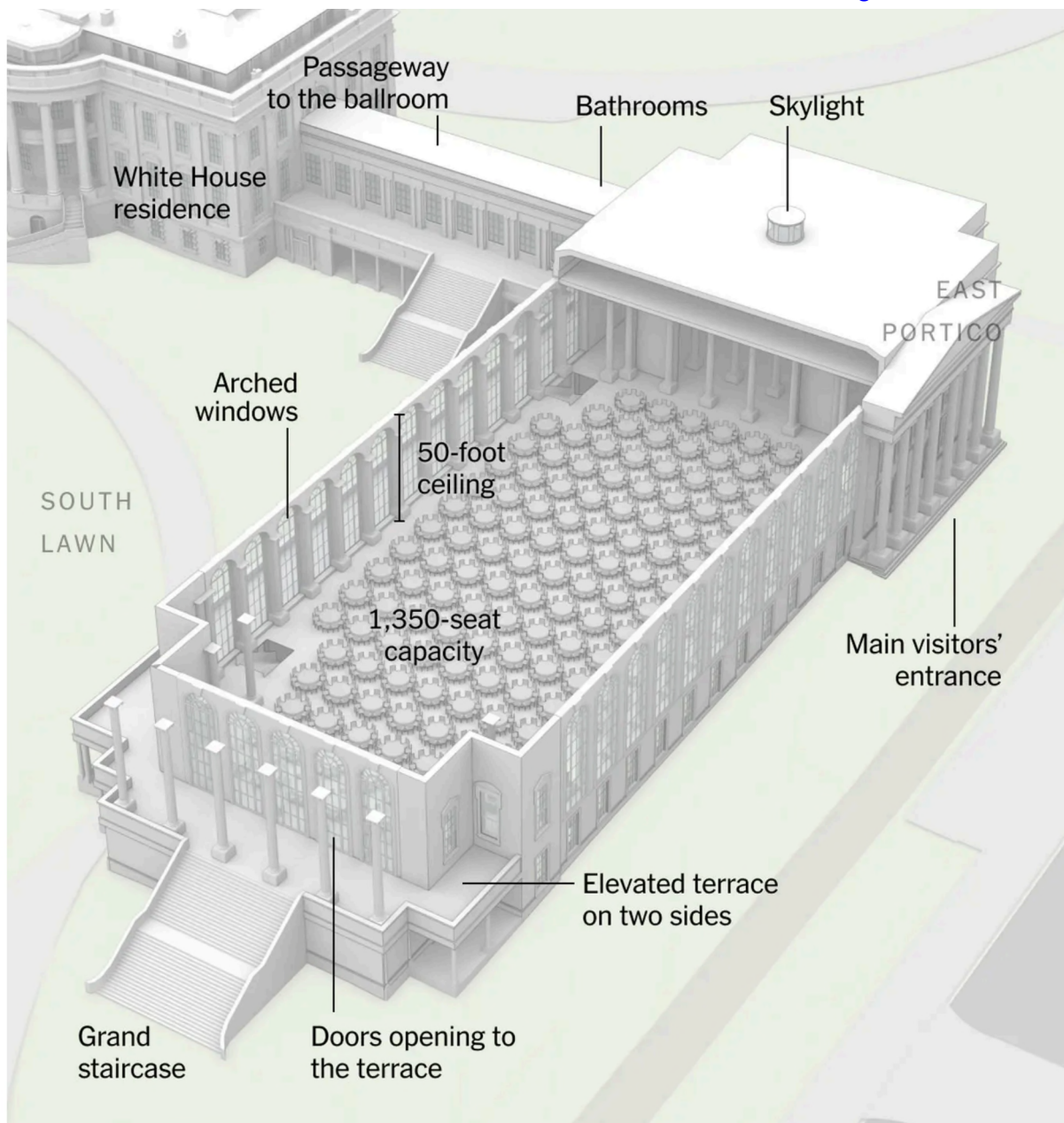
The various plans released so far, including a rushed model made by a contractor, have included windows that collide into each other and a staircase to nowhere.

Richard W. Longstreth, an architectural historian and a professor at George Washington University, noted that the public had yet to see a final design of the building. He said the ballroom project's success would depend a lot on its execution.

“I have nothing against the contemporary use of classical architecture, if it’s done well,” he said. “And there are people who can do it very well, and others who cannot.”

The president initially considered ways to preserve the East Wing, the traditional offices of the first lady and the entrance to the White House for millions of Americans on official tours.





Note: Rendering is based on a preliminary drawing and images of a model of the proposed East Wing released by the White House. Junho Lee and Lazaro Gamio/The New York Times

McCrery Architects provided options to build the ballroom as an addition to the East Wing or construct the new facility over it. But Mr. Trump rejected those plans.

Under the latest designs, the offices of the first lady would be on the ground floor of the proposed ballroom, with a main visitor entrance from the East Portico.

“We started with a much smaller building, and then I realized, we have the land, let’s do it right,” Mr. Trump said recently to donors, during an event to raise money for the ballroom project. “And so we built a larger building that can really hold just



about any function that we want.”

Many have embraced the idea of Mr. Trump’s new ballroom as a benefit to the complex, pointing out problems with hosting large events in tents on White House grounds.

Joseph Malchow, who is on the board of the National Civic Art Society with Mr. McCrery, said Mr. Trump was leading an effort to restore “classical American architecture.”

Mr. Trump has said taxpayers are not on the hook for the ballroom, whose costs have risen by 50 percent, from \$200 million to \$300 million. The president has said he already raised \$350 million from donors, including from major tech and crypto companies, and that businesses pledged to donate all of the steel and air conditioning.

But that payment method means going around Congress to fund the project, cutting legislators out of having any say over its direction.

“The White House is one of the great buildings in this country. It’s the so-called people’s palace,” said Richard Guy Wilson, professor emeritus of architectural history at the University of Virginia. “This new ballroom that’s going up, it’s gigantic, and unfortunately, it’s going to sort of dominate.”

## **‘An Important Designer’**



Mr. Trump has undertaken numerous projects to remake the White House, including adding gold-framed photos of every American president except his predecessor, Joseph R. Biden Jr., whom he depicted as an autopen; paving over the Rose Garden grass to add a patio; putting gold letters outside on the side of the White House that say “Oval Office” and adding gold ornaments to the Cabinet Room. New York Times

photographs by Doug Mills, Tierney L. Cross and Haiyun Jiang

The ballroom project is Mr. Trump’s latest push to remake the White House in his own image.

He has added gold moldings and gold decorations throughout the Oval Office, and gold ornaments to the Cabinet Room.

He removed a photo of Hillary Clinton, the former first lady and secretary of state, and replaced it with an image of his own face colored with the American flag. He added marble floors and a chandelier to the Palm Room.

He paved over the Rose Garden grass to add a patio. Along the West Wing colonnade, he added gold-framed photos of every American president except his predecessor, Joseph R. Biden Jr., whom he depicted as an autopen.

Mr. Longstreth noted that many of Mr. Trump’s changes could be undone by future presidents. “A lot of that is reversible,” he said. “And presidents have often come in and changed the decoration to a considerable degree.”





Will Scharf, right, the president's personal lawyer, was installed as the chairman of the National Capital Planning Commission to clear the path for the ballroom project. Doug Mills/The New York Times

Still, Mr. Trump is showing no signs of stopping. He recently gutted the bathroom in the Lincoln Bedroom, posting two dozen photos on social media of the renovation. And he has informally discussed undertaking more projects at the White House, including more work on the West Wing.

A White House official said that a large-scale renovation of the West Wing was not currently under consideration, but that Mr. Trump would be making more changes.

Speaking of the design plans for the new ballroom, Mr. Trump has said that he likes to see different proposals, but that he ultimately has the final say.

"I consider myself an important designer," Mr. Trump has said.





The demolition of the East Wing of the White House in October. Doug Mills/The New York Times

***A correction was made on Nov. 29, 2025: A previous version of this article incorrectly identified the federal agency whose board members were fired by President Trump. It was the Commission of Fine Arts, not the Fine Arts Council.***

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When we learn of a mistake, we acknowledge it with a correction. If you spot an error, please let us know at [nytnews@nytimes.com](mailto:nytnews@nytimes.com). [Learn more](#)

**Luke Broadwater** covers the White House for The Times.

# **EXHIBIT L**



National Trust *for*  
Historic Preservation®

October 21, 2025

Mr. William Scharf, Chair  
National Capital Planning Commission  
401 Ninth Street NW, Suite 500N  
Washington, DC 20004

Ms. Jessica Bowron  
Acting Director, National Park Service  
National Park Service  
1849 C Street NW  
Washington, DC 20240

Ms. Billie Tsien, Chair  
Commission of Fine Arts  
401 F Street NW, Suite 312  
Washington, DC 20001-2728

***Re: Proposed Construction of White House Ballroom***

Mr. Scharf, Ms. Bowron, and Ms. Tsien,

The National Trust for Historic Preservation in the United States (“National Trust”) is a private charitable, educational, nonprofit corporation headquartered in Washington, D.C. and chartered by Congress in 1949 to further the historic preservation policy of the United States. 54 U.S.C. § 312102(a). This Congressional charter obligates the National Trust to “facilitate public participation in the preservation of sites, buildings, and objects of national significance or interest.” Our mission is to protect America’s significant historic sites and to advocate for historic preservation as a core public value.

President Trump has proposed the construction of a 90,000-square-foot ballroom on the east side of the White House campus, adjacent to the historic Treasury Building. Site preparation is already underway, including the demolition of a portion of the existing East Wing.

While the National Trust acknowledges the utility of a larger meeting space at the White House, we are deeply concerned that the massing and height of the proposed new construction will overwhelm the White House itself—it is 55,000 square feet—and may also permanently disrupt the carefully balanced classical design of the White House with its two smaller, and lower, East and West Wings.



The federally recognized Secretary of the Interior's Standards for Rehabilitation offer clear guidance for construction projects affecting historic properties. The Standards provide that new additions should not destroy the historic fabric of the property and that the new work should be compatible with existing massing, size, scale, and architectural features.

Owned by the American people, the White House was designed by Irish architect James Hoban, whose winning proposal was selected by President George Washington. The building respects Georgian and neoclassical principles. It is a National Historic Landmark, a National Park, and a globally recognized symbol of our nation's ideals.

We respectfully urge the Administration and the National Park Service to pause demolition until plans for the proposed ballroom go through the legally required public review processes, including consultation and review by the National Capital Planning Commission and the Commission of Fine Arts, and to invite comment from the public. These processes provide a crucial opportunity for transparency and broad engagement—values that have guided preservation of the White House under every administration going back to the public competition in 1792 that produced the building's original design. Doing so will help ensure that the project both honors the exceptional historic significance of the White House and acknowledges the investment that the American people have in the preservation of this beloved place.

The National Trust stands ready to assist the White House, the National Park Service, and relevant review agencies in exploring design alternatives and modifications that would accomplish the objectives of the Administration while preserving the historic integrity and symbolism of the People's House.

As we approach the 250<sup>th</sup> Anniversary of our country's founding, the preservation of historic places that represent our nation's history has never been more relevant or important. We urge you to take into account the deep reverence that all Americans hold for this iconic place, and to initiate the review process that can ensure the preservation of the historic White House for future generations.

Sincerely,



Dr. Carol Quillen  
President and Chief Executive Officer

# **EXHIBIT M**

WHITE HOUSE

# White House's entire East Wing to be demolished 'within days,' officials say

Trump said in July that the project “won’t interfere with the current building.”



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Oct. 22, 2025, 4:41 PM EDT / Updated Oct. 23, 2025, 8:29 AM EDT

By Gabe Gutierrez, Monica Alba, Peter Alexander and Dareh Gregorian

The entire East Wing of the White House [will be demolished](#) “within days,” according to two Trump administration officials.

The demolition is a significant expansion of the ballroom construction project from what President Donald Trump said this summer.



“It won’t interfere with the current building,” Trump said on July 31. “It’ll be near it, but not touching it, and pays total respect to the existing building, which I’m the biggest fan of.”

[The New York Times](#) first reported the extent of the demolition.

A White House official told NBC News the “entirety” of the East Wing would eventually be “modernized and rebuilt” while acknowledging the process is fluid.

“The scope and the size of the ballroom project have always been subject to vary as the process develops,” the official told NBC News.



— Demolition of the East Wing of the White House on Wednesday night.

Stefani Reynolds / Bloomberg via Getty Images

Receiving a significant expansion during [Franklin D. Roosevelt](#)'s presidency in 1942, the East Wing is connected to and part of the White House complex, and it has typically been used by the

first lady and her staff.

Construction on the ballroom began last month. Trump has said it will hold [up to 900 people](#), and last week he said the total price would be about \$250 million, which he said he and private donors will pay for. However, on Wednesday, Trump said the ballroom's price is "about \$300 million."

A White House official told NBC News via email that "all the historical components of the East Wing, such as elements from [Rosalynn] Carter's original Office of the First Lady, have been preserved and stored under the supervision of the White House Executive Residence and the National Park Service with support from the White House Historical Association. Plans are in place for future use."

The National Trust for Historic Preservation, a nonprofit agency created by Congress to help preserve historic buildings, [warned administration officials in a letter](#) Tuesday that the planned ballroom "will overwhelm the White House itself."

"We respectfully urge the Administration and the National Park Service to pause demolition until plans for the proposed ballroom go through the legally required public review processes," Carol Quillen, the National Trust's CEO, said in a statement.

The White House argues that it hasn't been required to submit plans for review by the National Capital Planning Commission because only demolition – and not technically construction – has begun.

The U.S. Commission of Fine Arts, the National Capital Planning Commission and D.C. State Historic Preservation Office are the regulatory agencies that would traditionally be involved in greenlighting any major renovations at the White House, according to a person familiar with the matter.

But the White House is ultimately exempt from their binding authority and approval process, the person said, because of what a symbolically unique property 1600 Pennsylvania Ave. is.



— The model of the planned expansion of the White House is presented during a meeting in the Oval Office on Tuesday. Jim Watson / AFP - Getty Images

The Trust for the National Mall oversees the private donations given to support the ballroom project as the nonprofit partner of the National Park Service. The design and construction are being led by Trump himself, alongside McCrery Architects.

So far, Trump has made significant changes to the Rose Garden, the Oval Office, the Cabinet Room and the Palm Room. He also installed two gigantic flagpoles on the property.

Some experts have questioned how transparent the administration has been about the ballroom construction project.

Bryan Clark Green, an architectural historian and former appointee to the National Capital Planning Commission, said in an interview: “From a norms and customs side, administrations have always gone through that [approval] process to get buy-in and to make sure the public sees the process and isn’t surprised by the design. The whole point of the review process is to improve the design.



"So you had the [Trump] statement over the summer that this will not affect the East Wing at all. But, obviously, it is. A public process would have avoided that kind of shock and surprise."

Priya Jain, a member of the Society of Architectural Historians, said: "It seems like they [the White House] plan to submit their proposal to the National Capital Planning Commission. However, in regular federal projects, deliberation happens before anything is demolished."

Construction plans weren't submitted to the National Capital Planning Commission in advance, but a White House official claimed they will be "soon when it is time."

It's unclear what that time frame is. The NCPC is affected by the government shutdown.

Construction crews were seen this week ripping down the East Wing facade, prompting criticism from Democrats, historians and even some Republicans.

The White House called the uproar "manufactured outrage" by "unhinged leftists and their Fake News allies" in a [news release](#) Tuesday.

The critics, the White House said, were "clutching their pearls over President Donald J. Trump's visionary addition of a grand, privately funded ballroom to the White House."

The release called the planned ballroom "a bold, necessary addition that echoes the storied history of improvements and renovations from commanders-in-chief to keep the executive residence as a beacon of American excellence."

It noted that numerous other presidents have had renovations and construction work done at the site. "FACT: For more than a century, U.S. Presidents have been renovating, expanding, and modernizing the White House to meet the needs of the present day," it said, pointing to specific examples.

Trump held a dinner at the White House last week to thank donors to the project.

Comcast Corp., the parent company of NBCUniversal, was included on a list of top donors. It is unclear how much Comcast and other donors have contributed; Alphabet, the parent company of YouTube, agreed last month to donate \$22 million to the project in a settlement of a court case Trump had brought against the online video platform.



Gabe Gutierrez

Gabe Gutierrez is a senior White House correspondent for NBC News.

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Monica Alba

Monica Alba is a White House correspondent for NBC News.

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Peter Alexander

Peter Alexander is chief White House correspondent for NBC News.

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Dareh Gregorian

Dareh Gregorian is a politics reporter for NBC News.

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Sarah Dean contributed.

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# **EXHIBIT N**



**National Park Service**

# The White House and President's Park

District of Columbia

## The White House is a National Park

The White House is owned by the American people and stewarded by the National Park Service. It is more than the President's residence; it is a site for protests and national discourse about what it means to be American. As one of the most iconic sites in the country, the White House and President's Park seeks to tell the stories of all people who have lived, worked, and visited.



### How to Tour the White House ›

(<https://www.nps.gov/whho/playourvisit/the-white-house-tour.htm>)

Tours must be scheduled through your Congressperson or embassy.

### White House Visitor Center ›

(<https://www.nps.gov/whho/playourvisit/white-house-visitor-center.htm>)

The Visitor Center is a place to learn about the White House and engage with ranger staff.

### Military Monuments and Memorials ›

(<https://www.nps.gov/whho/learn/historyculture/military-monuments-and-memorials.htm>)

Discover individuals and military units honored, memorialized, and commemorated in Lafayette Park and on the Ellipse.



### History and Culture ›



### Things to Do ›

(<https://www.nps.gov/whho/learn/historyculture/index.htm>)

Learn about the people, places, and stories that define the White House and President's Park.

(<https://www.nps.gov/whho/planyourvisit/things2do.htm>)

Learn how to explore President's Park, see the White House, and more.

Last updated: August 25, 2025

## Was this page helpful?

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# **EXHIBIT O**



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**National Park Service**

# The White House and President's Park

District of Columbia

*NPS.gov* (<https://www.nps.gov/>) / *Park Home* (<https://www.nps.gov/whho/index.htm>)  
/ *Plan Your Visit* (<https://www.nps.gov/whho/planyourvisit/index.htm>) / *Basic Information*

## Basic Information

Located in the center of downtown Washington, DC, President's Park includes the park land and gardens surrounding the White House. Amid the vibrant city life of our nation's capital, President's Park offers visitors, district residents, and the President of the United States restorative green space, awe-inspiring memorials, and the White House itself to contemplate as a symbol of the United States and democracy.

## Be Prepared

- [Operating Hours and Seasons](https://www.nps.gov/whho/planyourvisit/hours.htm) (<https://www.nps.gov/whho/planyourvisit/hours.htm>) - Find out when is the best time to visit President's Park.
- [Fees and Passes](https://www.nps.gov/whho/planyourvisit/fees.htm) (<https://www.nps.gov/whho/planyourvisit/fees.htm>) - A visit to President's Park is free!
- [Permits and Reservations](https://www.nps.gov/whho/planyourvisit/permitsandreservations.htm) (<https://www.nps.gov/whho/planyourvisit/permitsandreservations.htm>) - Learn how to apply for a permit at President's Park.



The public gets to view the White House up close during the White House Fall Garden Tour.  
*NPS photo*

## Physical Address

1450 Pennsylvania Ave., NW  
Washington, DC 20230

## Directions

The White House is located in downtown Washington, DC, directly north of the Washington Monument. The park boundaries are between 17th and 15th Streets NW on the east and west and between Constitution Ave NW and H St NW on the north and south. The nearest Metro stations are Farragut North/South, McPherson Square, and Federal Triangle. The park visitor center is located at 15th St. & Pennsylvania Ave.

[Directions Details \(http://www.nps.gov/whho/planyourvisit/directions.htm\)](http://www.nps.gov/whho/planyourvisit/directions.htm)

## Operating Hours & Seasons

## Weather

## Fees & Passes

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Media Release



Capital One Arena

By Stephen Staudigl / July 14, 2025

## NCPC WELCOMES NEW CHAIRMAN AND PRESIDENTIAL APPOINTEES

Commission Provides Feedback on Poplar Point Revised Concept Master Plan and Capital One Arena Improvements

The Thursday, July 10 National Capital Planning Commission (NCPC) meeting (<https://www.ncpc.gov/review/archive/2025/07-10/>) was the first led by new **Chairman William Scharf** (At-Large). He, and **Presidential Appointees Stuart Levenbach** (Maryland) and **Michael Blair** (Virginia) were appointed to the Commission by **President Donald J. Trump** on July 9, 2025.

At the meeting, NCPC provided feedback to the National Park Service on the revised concept **Poplar Point Master Plan**. Submitted in coordination with the District of Columbia Office of the Deputy Mayor for Planning and Economic Development and the District of Columbia Office of Planning, the plan provides an updated vision for redeveloping the 110-acre site located in Southeast Washington in Anacostia River East, across the Anacostia River from Nationals Park.

The plan seeks to meet the Federal and District of Columbia Government Real Property Act of 2006 requirements that would facilitate the transfer of Poplar Point from the federal government to the District government. The act requires preservation of no fewer than 70 acres of land, including wetlands, for park purposes; identification of sites for, and relocation of, existing National Park Service facilities and related properties; and determination of at least two sites for potential commemorative works.

The updated plan has one preferred alternative where the Point (the area east of the South Capitol Street Bridge that juts out into the river) would have cultural and civic uses. New development, including a proposed 15-acre anchor use, would be close to the Anacostia Metrorail station. An extension of Anacostia Drive would be routed away closer to new development to open access to the riverfront. Two pedestrian access points would connect to Historic Anacostia. There would be approximately seven acres of wetlands with education and recreation opportunities including paths and boardwalks.

Commissioners were enthusiastic about how the preferred alternative addresses all their previous comments and concerns, and very supportive of the project's goals. They encouraged the applicant to continue community coordination and outreach.

Commissioners approved final site and building plans submitted by the Smithsonian Institution for the **National Air and Space Museum Construct Integrated Bezos Learning Center**. The three-story, approximately 80,000 square foot addition will be built at the museum's east end on the National Mall. A 600-700 seat restaurant and a vestibule connection to the museum will be on the ground floor with programming on the top two levels. The grounds will include a Learning Courtyard and an Astronomy Park, which will be the permanent home of the Phoebe Waterman Haas Observatory. The spiral galaxy influenced the building's design.

Commissioners were pleased that the applicant addressed its prior concerns including those related to the building's south façade upper volume terminus, impacts of lighting on surrounding museums and memorials, wayfinding and visitor circulation, and stormwater management and planting plans. They felt that the final design is exciting and that the concept stayed true while being updated through the design review process.

NCPC approved preliminary building plans submitted by the District of Columbia Office of the Deputy Mayor for Planning and Economic Development and Monumental Sports & Entertainment for proposed **Capital One Arena improvements**. The plans would redesign the arena to visually transform it into a dynamic gathering location that better blends in with its surroundings, is a catalyst for future neighborhood improvements, and is furthered as a centrally located entertainment venue.

While the project also includes extensive interior renovations, NCPC only reviews proposed exterior enhancements. These include relocation of the F Street main entrance closer to 7th Street; improved entrances on 7th and 6th Streets; new digital screen displays and lighting; and the addition of a metal mesh wrap architectural veil on the building's top. Construction would be done in six phases beginning before the start of the 2027-2028 season.

Commissioners were very supportive of the project's goal to extend the building's life as an anchor in downtown Washington and appreciative of the applicant's response to previous NCPC comments as the design has evolved.

The Commission approved preliminary site development plans submitted by the National Park Service for the **rehabilitation of Ash Road** located in the National Mall's western portion. The Park Service seeks to repair the approximately 0.3 mile tree-lined access road located between the World War II and Korea War Veterans Memorials and repave it with exposed gray aggregate concrete. Plans also call for upgrading benches, lighting, and bike racks and renaming it Ash Walk to better reflect its intended use as a route for restricted vehicles, bicyclists, and pedestrians.

NCPC staff and National Park Service consultants then provided an information presentation on the **National Mall and Memorial Parks Telecommunications Infrastructure Plan** which will evaluate telecommunications infrastructure improvement alternatives for the Mall. No action is taken on information presentations. The Commission saw this presentation because NCPC is responsible for the review of antenna placement and their structures on federal land in the National Capital Region and on District of Columbia-owned land in Washington, DC.

Expanded cell phone coverage and capacity is needed and the plan will provide a planning and technical framework to guide improvements to networks across the National Mall and surrounding areas while seeking to create a capacity five times its current service level. While the plan will consider possible antenna locations, it will not propose antenna designs. For the plan's purpose, the Mall is divided into five study areas that will each have site-specific solutions.

Commission actions and related materials are available online. (<https://www.ncpc.gov/review/archive/2025/7/>)

The Commission approved four items on the Consent Calendar (no presentation was made). Unless otherwise noted, the projects are in Washington, DC.

1. Preliminary and final site and building plans for the St. Elizabeths West Campus Antenna Installation, Cedar Street, SE. (8674)
2. Comments to the Mayor of the District of Columbia for the District of Columbia Capital Improvements Plan FY 2026 – 2031. (0348)
3. Comments on the Humphreys Engineer Center Draft Master Plan, 7701 Telegraph Road, Alexandria, Virginia. (MP202)
4. Preliminary and final site development plans for the Pentagon West End Security Fence, 104 Boundary Channel Drive, Arlington, Virginia. (8677)

*The Executive Director approved eleven items under authority delegated by the Commission. Unless otherwise noted, the projects are in Washington, DC.*

1. Preliminary and final site and building plans for the Southeast Federal Center Parcel P3 Redevelopment – The Yards, 1300 5th Street, SE. (8654)
2. Preliminary site and building plans for the Potomac Hill Access Control Facility, 2300 E Street, NW. (8666)
3. Preliminary and final building plans for the Frances E. Perkins Federal Building Antenna Replacement and Site Renewal, 200 Constitution Avenue, NW. (8671)
4. Preliminary site and building plans for the National Zoological Park Hawthorne Street Electrical Substation Replacement, 3001 Connecticut Avenue, NW. (8673)
5. Final site and building plans for the Fort Davis Community Center Reconstruction and Site Improvements, 1400 41st Street, SE. (8633)



6. Preliminary and final site development plans for the Food and Drug Administration Submerged Gravel Wetland, 10901 New Hampshire Avenue, Silver Spring, Maryland. (8679)
7. Preliminary site and building plans for the Joint Base Andrews West Fitness Center Addition, Camp Springs, Maryland. (8680)
8. Preliminary and final site and building plans for the Harvey W. Wiley Federal Building Antenna Array Modification, 5001 Campus Drive, College Park, Maryland. (8518)
9. Preliminary and final site development plans for the Pentagon Fern Street Vehicle Access Point Security Fence, Arlington, Virginia. (8676)
10. Report to the Zoning Commission of the District of Columbia for the Text Amendment to Subtitle A and K, regarding Living Classrooms Foundation, 1300 5th Street, SE. (ZC 24-14)
11. Report to the Zoning Commission of the District of Columbia for the Proposed Map Amendment from RA-5 to ARTS-3 at Square 0210, Lot 0827, 1405 15th Street, NW. (ZC 24-16)

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Media Release: NCPC Provides Input on Potential Women's Suffrage National Monument Sites (</news/item/255/2/>)

BY STEPHEN STAUDIGL

At its Thursday, December 4 meeting the National Capital Planning Commission provided input on four potential sites for the Women's Suffrage National Monument submitted by the National Park Service in collaboration with the Women's Suffrage National Monument Foundation. The four potential sites are Constitution Gardens West, Constitution Gardens East, Hockey Fields East, and Washington Monument South. The proposed monument will commemorate the women's suffrage movement and the passage of the 19th Amendment to the U.S. Constitution.



#### Media Release: NCPC Approves Final Capital One Arena Improvements Plans (/news/item/254/2/)

BY STEPHEN STAUDIGL

At its Thursday, September 4 meeting the National Capital Planning Commission approved final building plans for proposed Capital One Arena improvements submitted by the District of Columbia Office of the Deputy Mayor for Planning and Economic Development and Monumental Sports & Entertainment. The plans would redesign the arena to transform it into a dynamic gathering location that better blends in with its surroundings, is a catalyst for future neighborhood improvements, and is furthered as a centrally located entertainment venue.

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# EXHIBIT Q



# PHOTOS: White House starts East Wing demolition to build Trump's ballroom

Politics Updated on Oct 23, 2025 10:19 AM EST — Published on Oct 21, 2025 12:16 PM EST

**CORRECTION:** PBS News has updated an Oct. 21 story withdrawn by The Associated Press that quoted White House press secretary Karoline Leavitt as saying over the summer that “nothing will be torn down” in reference to construction starting at the White House on a ballroom and crews tearing down the façade of the East Wing. The AP incorrectly attributed that quote to Leavitt in that story and two others, one on July 31 and Oct. 20. It was a journalist, not Leavitt, who said the quote while asking a question during a briefing Leavitt gave to reporters on July 31. The error was brought to the AP’s attention on Oct. 22.

WASHINGTON (AP) — The White House on Monday started tearing down part of the East Wing, the traditional base of operations for the first lady, to build President Donald Trump’s \$250 million ballroom despite lacking approval for construction from the federal agency that oversees such projects.

**READ MORE:** White House says it will begin construction on \$200 million ballroom in September

Dramatic photos of the demolition work showed construction equipment tearing into the East Wing façade and windows and other building parts in tatters on the ground. Some reporters watched from a park near the Treasury Department, which is next to the East Wing.

Trump announced the start of construction in a social media post and referenced the work while hosting 2025 college baseball champs Louisiana State University and LSU-Shreveport in the East Room. He noted the work was happening “right behind us.”



Workers demolish the facade of the East Wing of the White House on Oct. 20, 2025 in Washington, DC. The demolition is part of U.S. President Donald Trump’s plan to build a ballroom reportedly costing \$250 million on the eastern side of the White House. Photo by Kevin Dietsch/Getty Images

“We have a lot of construction going on, which you might hear periodically,” he said, adding, “It just started today.”

**READ MORE:** 9 things to know about the \$250 million ballroom Trump is adding to the White House

The White House has moved ahead with the massive construction project despite not yet having sign-off from the National Capital Planning Commission, which approves construction work and major renovations to government buildings in the Washington area.

Its chairman, Will Scharf, who is also the White House staff secretary and one of Trump’s top aides, said at the commission’s September meeting that agency does not have jurisdiction over demolition or site preparation work for buildings on federal property.

“What we deal with is essentially construction, vertical build,” Scharf said last month.

It was unclear whether the White House had submitted the ballroom plans for the agency’s review and approval. The White House did not respond to a request for comment and the commission’s offices are closed because of the government shutdown.

The Republican president had said in July when the project was announced that the ballroom would not interfere with the mansion itself.





Workers demolish the facade of the East Wing of the White House on Oct. 20, 2025 in Washington, DC. The demolition is part of U.S. President Donald Trump's plan to build a ballroom reportedly costing \$250 million on the eastern side of the White House. Photo by Kevin Dietsch/Getty Images



The facade of the East Wing of the White House is demolished by work crews on Oct. 20, 2025 in Washington, DC. The demolition is part of U.S. President Donald Trump's plan to build a ballroom reportedly costing \$250 million on the eastern side of the White House. Photo by Kevin Dietsch/Getty Images

"It'll be near it but not touching it and pays total respect to the existing building, which I'm the biggest fan of," he said of the White House.

The East Wing houses several offices, including those of the first lady. It was built in 1902 and has been renovated over the years, with a second story added in 1942, according to the White House.



The facade of the East Wing of the White House is demolished by work crews on October 21, 2025 in Washington, DC. The demolition is part of U.S. President Donald Trump's plan to build a ballroom reportedly costing \$250 million on the eastern side of the White House. Photo by Andrew Harnik/Getty Images

Karoline Leavitt, the White House press secretary, said those East Wing offices will be temporarily relocated during construction and that wing of the building will be modernized and renovated.

Trump insists that presidents have

desired such a ballroom for 150 years and that he's adding the massive 90,000-square-foot, glass-walled space because the East Room, which is the largest room in the White House with an approximately 200-person capacity, is too small. He also has said he does not like the idea of hosting kings, queens, presidents and prime ministers in pavilions on the South Lawn.

Trump said in the social media announcement that the project would be completed "with zero cost to the American Taxpayer! The White House Ballroom is being privately funded by many generous Patriots, Great American Companies, and, yours truly."



A demolition crew takes apart the facade of the East Wing of the White House, where U.S. President Donald Trump's proposed ballroom is being built, in Washington, D.C. on Oct. 21, 2025. Photo by Jonathan Ernst/ Reuters

The ballroom will be the biggest structural change to the Executive Mansion since the addition in 1948 of the Truman Balcony overlooking the South Lawn, even dwarfing the residence itself.

At a dinner he hosted last week for some of the wealthy business executives who are donating money toward the \$250 million construction cost, Trump said the project had grown in size and now will accommodate 999 people. The capacity was 650 seated people at the July announcement.

The White House has said it will disclose information on who has contributed money to build the ballroom, but has yet to do so.



People stand as a demolition crew takes apart the facade of the East Wing of the White House, where U.S. President Donald Trump's proposed ballroom is being built, in

Trump also said at last week's event that the head of Carrier Global Corp., a leading manufacturer of heating, ventilation and air conditioning systems, had offered to donate the air conditioning system for the ballroom.

Carrier confirmed to The Associated Press on Monday that it had done so. A cost estimate was not immediately available.

Washington, D.C., on Oct. 21, 2025. Photo by  
Jonathan Ernst/ Reuters

“Carrier is honored to provide the new iconic ballroom at the White House with a world-class, energy-efficient HVAC system, bringing comfort to distinguished guests and dignitaries in this historic setting for years to come,” the company said in an emailed statement.

The clearing of trees on the south grounds and other site preparation work for the construction started in September. Plans call for the ballroom to be ready before Trump’s term ends in January 2029.

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By — Darlene Superville, Associated Press

# **EXHIBIT R**





## WHITE HOUSE

## Trump taps personal lawyer Will Scharf for White House staff secretary

Scharf was a member of Donald Trump's legal team in his federal election interference case and his Supreme Court immunity case.



In the role, Will Scharf will decide which memos will go to the president and who should weigh in on issues and speeches. | Charly Triballeau/AFP via Getty Images

By **IRIE SENTNER**

11/16/2024 04:52 PM EST



President-elect Donald Trump on Saturday tapped one of his personal attorneys, Will Scharf, to serve as White House staff secretary — a low-profile but powerful role controlling the paper flow to the Oval Office.

Scharf was a member of Trump's legal team in his [federal election interference case](#) and his Supreme Court immunity case, and played a part in getting Trump's Supreme Court nominees Brett Kavanaugh and Amy Coney Barrett confirmed. He has frequently appeared on TV to defend Trump — [joining the list](#) of incoming Trump administration officials who are cable regulars.

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Scharf unsuccessfully ran for attorney general of Missouri, losing the Republican primary in August. Both Scharf and his opponent, Andrew Bailey, had been [endorsed by Trump](#). Over the course of the campaign, Scharf leaned on his connections to Trump to bolster his message.

“Will is a highly skilled attorney who will be a crucial part of my White House team,” Trump said in a statement released Saturday.

In the role, Scharf will decide which memos, briefings and reports will go to the president and who should weigh in on issues and speeches.

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WHITE HOUSE, DONALD TRUMP, LEGAL, PRESIDENTIAL TRANSITION,  
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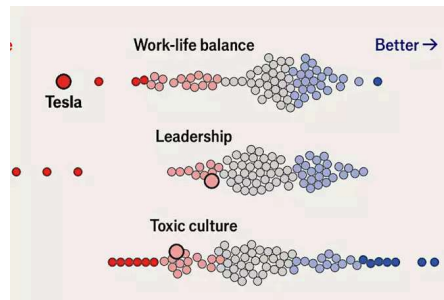
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# **EXHIBIT S**

**POLITICS****Donald Trump****Add Topic**

# Trump waltzes into ballroom controversy with 'two geniuses' and an East Wing demolition

*As pictures of the White House demolition began circulating, critics expressed outrage as the nation's preeminent historical structure stood gutted.*

**Swapna Venugopal Ramaswamy**

USA TODAY

Oct. 22, 2025 | Updated Oct. 23, 2025, 2:37 p.m. ET

WASHINGTON – Standing at a [podium last week](#) in the East Room, President [Donald Trump](#) talked about two men who had advised him about zoning permits for his long-desired [White House ballroom](#).

At that Oct. 15 dinner, ordered up to thank private donors to the project, America's 45th and 47th president described the men as “these two geniuses” who were “like movie stars.” Trump recalled them telling him he could [start the process immediately](#) for the project “near” the East Wing. No permits or reviews were needed.

A [second-generation real estate businessman](#), Trump explained that he was well-versed with the “brutal” process of getting zoning approvals but couldn’t believe his ears that he could move with such speed at 1600 Pennsylvania Avenue.

**More:** [In a sudden change of plans, Trump to demolish White House East Wing entirely](#)

“I said, 'How long would it take? They said: ‘Sir, you can start tonight. You have zero zoning conditions. You have no approvals,’” Trump said. “I said, ‘You gotta be



kidding.' He said: 'Sir, this is the White House. You're the president of the United States. You can do anything you want.'"

The White House did not respond to a question from USA TODAY seeking the identity of the two men, but his faith in them may come back to haunt him. It's already happening.

## **Trump in July: Ballroom construction will not touch the East Wing**

When the White House first released plans for the ballroom July 31, Trump told reporters the 90,000-square-foot addition would be "built over on the east side and it will be beautiful."

"It'll have views of the Washington Monument. It won't interfere with the current building," he said. "It'll be near it but not touching it and pay total respect to the existing building, which I'm the biggest fan of."

Less than three months later, [bulldozers had removed the entire East Wing of the White House](#). The construction was no longer "near" the part of the building that historically housed the first lady's offices – as Trump had initially described the project.

The demolition was in full swing. So was the backlash.

## **Hillary Clinton: 'It's not his house. It's your house'**

On Oct. 21, when pictures from the demolition site began circulating, a chorus of voices, including former first lady Hillary Clinton, expressed outrage as the nation's preeminent historical structure stood gutted.

**More:** ['It's not his house. It's your house.' Politicians react to White House demolition](#)

Clinton posted a picture of the torn-down facade with the [caption on X](#): "It's not his house. It's your house. And he's destroying it."

The National Trust for Preservation urged the administration and the National Park Service to pause demolition until plans for the proposed ballroom “go through the legally required public review processes, including consultation and review by the National Capital Planning Commission and the Commission of Fine Arts,” both of which it said have authority to review new construction at the White House.

Carol Quillen, the National Trust's president and CEO, said in a letter to the National Capital Planning Commission, the National Park Service and the Commission of Fine Arts that the group acknowledges the utility of a larger White House footprint. But she said it remained concerned about the size of the building addition.

The 90,000 square feet of new construction “will overwhelm the White House itself,” which is 55,000 square feet, Quillen wrote, adding: “(The addition) may also permanently disrupt the carefully balanced classical design of the White House with its two smaller, and lower, East and West Wings.”

Sen. Elizabeth Warren, D-Massachusetts, pointed to the timing of the project, which broke ground on [Day 21 of the government shutdown](#) that has left hundreds of thousands of people working without pay.

“Oh you're trying to say the cost of living is skyrocketing?” Warren [wrote on X](#). “Donald Trump can't hear you over the sound of bulldozers demolishing a wing of the White House to build a new grand ballroom.”

Trump said the sound of construction was [music to his ears](#).

## **A Trump ballroom commences with 'no approvals'**

Trump said he had been advised that no reviews of the project were needed.

But White House Chief of Staff Susie Wiles said in a statement unveiling the project July 31 that the “president and the Trump White House are fully committed to working with the appropriate organizations to preserving the special history of the

White House while building a beautiful ballroom that can be enjoyed by future Administrations and generations of Americans to come.”

Her comment contrasts with a congressional aide familiar with the process who told USA TODAY that no reviews had been submitted to be approved by the National Capital Planning Commission, which provides building and zoning advice to Washington, DC, and approves various federal construction plans.

Asked for a response, a White House official told USA TODAY that the National Capital Planning Commission does not have jurisdiction over demolition, only construction. Therefore, the official said, approval from the NCPC was not required or needed for demolition.

As for the construction, the White House will "soon" seek approval from the commission, the spokesperson told USA TODAY Oct.22.

On the question of why the facade had been demolished after the president had said the ballroom construction would not touch the East Wing, the official said the scope and size of the project was “always subject to vary” as the “process developed.”

## **'Compliments of a man known as Donald J. Trump'**

Trump for years and [across multiple administrations](#) had pitched the idea for a ballroom. He also had always said he'd finance the project.

"Just inspected the site of the new Ballroom that will be built, compliments of a man known as Donald J. Trump, at the White House," Trump wrote on [Truth Social on June 6](#). "For 150 years, Presidents, and many others, have wanted a beautiful Ballroom, but it never got built because nobody previously had any knowledge or experience in doing such things."

But that plan changed, too.

In the intervening months, Trump said private donors had lined up to pay for the \$300 million project.



At the Oct. 15 dinner, Trump announced that the project had been fully financed. The donors included some of the biggest American corporations, including those in the defense and tech industries with business before the government.

Some of them include Palantir, Lockheed Martin, Amazon, Google's parent company Alphabet and Meta.

"So many of you have been really, really generous," Trump said to the donors at the dinner. "A couple of you, here saying, sir, would \$25 million be appropriate? I said, 'I will take it.'"

Though the president may not be using taxpayer money for the project, the top Democrat on the Senate Appropriations Committee, Sen. Patty Murray of Washington, criticized Trump's timing in the middle of a government shutdown.

"His priorities are totally absurd. He should be negotiating with Democrats every single day until government is open and families are saved from financial ruin by extending the Affordable Care Act tax credits," Murray said. "He's focused on tearing down history to build a ballroom when millions of families will go uninsured."

## **New details on the ballroom plans – bulletproof glass**

Trump has said for years that the East Room, the biggest room in the White House, was too cramped for large gatherings. Often, state dinners have been moved to outdoor tents to accommodate the guests.

"When it rains, it's a disaster. And the tent's a hundred yards. That's more than a football field away from the main entrance," he said on Oct. 15. "It's not a pretty sight. The women with their lovely evening gowns, all of their hair all done and they're a mess by the time they get there."

When Trump recently paved over the lawn of the [Rose Garden](#), he said he was doing it in the service of women whose high heels are known to get stuck in the mud.

Trump has been on a renovation frenzy from the time he entered the White House for a second term in January.

He bathed the Oval Office in gold, added a "Presidential Walk of Fame" display along the South Colonnade featuring portraits of past presidents, and proposed construction of an arch across from the Lincoln Memorial.

As for the ballroom plan, Trump has said glass on the building would be bulletproof. It would seat 999 people – big enough, he said, for a "presidential inauguration."

And the target date for completion? By January 2029, when Trump's second term in the White House will be over and the 48th president of the United States takes office.

*Swapna Venugopal Ramaswamy is a White House correspondent for USA TODAY. You can follow her on X @SwapnaVenugopal*

# **EXHIBIT T**



EXCLUSIVE

DONALD TRUMP

## Trump says the new White House ballroom will be 'a little bigger' than initially planned

The capacity for the new ballroom will be 900 people, Trump told NBC News in an exclusive interview, which is nearly 40% larger than first described.

Get more news **LIVE** on  **NBC NEWS NOW.** [➤](#)

Sept. 13, 2025, 5:38 PM EDT

**By Peter Nicholas**

WASHINGTON – President Donald Trump said Saturday that the new ballroom he’s adding to the White House campus will be larger than first described, with a capacity of 900 people.

In a brief telephone interview with NBC News, the president said: “We’re making it a little bigger. It will be top of the line, as good as it can get anywhere in the world.”

A White House statement in July showed that the ballroom would seat up to 650 people, meaning the planned capacity has grown by nearly 40%.

Trump has said the ballroom will fill an important need at a crowded White House, sparing foreign leaders and other dignitaries from traipsing out to tents set up on the South Lawn for dinners and receptions.

The White House has estimated the cost at \$200 million. Trump reiterated in the interview that he will personally help pay for the addition. Private donors – “patriots,” as the White House has called them – are also expected to chip in.

A former real estate developer, Trump has taken a personal interest in the ballroom’s construction.

Work has already begun, as Trump noted to reporters gathered Friday on the South Lawn.

“Right there you see all the trucks,” he said. “They just started construction of the new ballroom for the White House.”

The ballroom represents the biggest change to the White House exterior since the East Wing was expanded under Franklin D. Roosevelt in 1942. It will take the place of the East Wing, which has traditionally served as office space for the first lady and her staff.

Trump is coming off a fraught week in which [he lost his friend and political ally Charlie Kirk](#) in an assassination. On Tuesday, he is due to leave for England, where he and first lady Melania Trump will be the guests at a state banquet hosted by King Charles and Queen Camilla at Windsor Castle.

Trump will be the first American president to have been invited for two state visits; his first took place in 2019 at the invitation of Queen Elizabeth, who died three years later.

“I look forward to saying hello to Charles and Camilla,” Trump told NBC News.

“It’s going to be incredible. It’s such a great honor.”



Peter Nicholas

Peter Nicholas is a senior White House reporter for NBC News.

# **EXHIBIT U**





# WATCH: Trump hosts dinner for donors to \$250 million White House ballroom project

Politics Oct 16, 2025 2:35 PM EST

WASHINGTON (AP) — President Donald Trump on Wednesday welcomed nearly 130 deep-pocketed donors, allies and representatives of major companies for a dinner at the White House to reward them for their pledged contributions to a massive new ballroom.

**Watch Trump's remarks in the video player above.**

The ballroom, whose price tag is now estimated at \$250 million, is the most significant renovation that Trump, a former real estate mogul, is undertaking during his second term at the White House.

**WATCH: The White House's iconic Rose Garden gets a makeover under Trump**

All four sides of the ballroom — which Trump said will be large and grand enough to hold even a presidential inauguration — will be made of bulletproof glass, with its color, window shape and molding keeping in character with the White House. Trump indicated that the fundraising and managing costs for the “phenomenal” ballroom were going well, predicting that he would have money left over after the project is done. “To me, there’s nothing like the White House,” Trump said, later adding, “It’s just a special place so we have to take care of it.”

Men in business suits and women in cocktail attire sat at a dozen round tables, decorated with tall, tapered candles and white floral arrangements, and sipped wine and water as they awaited their dinner to be served on gold-trimmed plates. Later, they would dine on an heirloom tomato panzanella salad, beef Wellington and a dessert of roasted Anjou pears, cinnamon crumble and butterscotch ice cream.

Among the companies that had representatives at the dinner, according to a White House official, were Amazon, Apple, Booz Allen Hamilton, Coinbase, Comcast, Google, Lockheed Martin, Meta Platforms and T-Mobile. The Adelson Family Foundation, founded by GOP megadonors Miriam Adelson and her late husband Sheldon, also had a presence there.

Oil billionaire Harold Hamm, Blackstone CEO Steve Schwarzman, Small Business Administration chief Kelly Loeffler and her husband, Jeff Sprecher, and crypto entrepreneurs Tyler and Cameron Winklevoss were all on the guest list. The list of attendees was first reported by The Wall Street Journal.

Also attending the dinner were Chris LaCivita, Trump’s co-campaign manager from his 2024 reelection bid; Reince Priebus, a White House chief of staff during Trump’s first term; and Jason Miller, another longtime political adviser.

The new ballroom is planned for the area where the East Wing is located and will encompass 90,000 square feet. The White House has previously said it will have a 650-person capacity, but Trump on Wednesday night said it will be able to hold up to 999 people.

**WATCH: A look at Trump's effort to reshape the White House in his image**

The ballroom project has yet to receive approvals from the National Capital Planning Commission and the Commission of Fine Arts, although White House staff secretary Will Scharf, who was also tapped by Trump to lead the planning commission, says approval is not needed. The commission vets construction of federal buildings.

At the dinner, Trump said there are no zoning requirements for him as the president of the United States and he can do whatever he wants with the construction.

The president has repeatedly complained that large White House events require construction of a tent on the South Lawn, since the East Room – the current largest space at the White House – can accommodate only about 200 people.

At the dinner, Trump also formally unveiled another project: an arch that will stand on one end of the Arlington Memorial Bridge, which crosses the Potomac River and connects Virginia and the District of Columbia. He showed off several miniature models of the proposed arch — which will feature Lady Liberty on top — in three sizes, although Trump acknowledged that the largest was his favorite.

“It’s going to be really beautiful,” Trump said.

*Associated Press writer Darlene Superville in Washington contributed to this report.*

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By — Seung Min Kim, Associated Press

# **EXHIBIT V**





Executive Secretary John Stanwich  
The Committee for the Preservation of the White House  
1849 C Street, NW, Room #1426  
Washington, DC 20240

August 5, 2025

Dear Members of the Committee for the Preservation of the White House:

For more than a century, The American Institute of Architects (AIA) has been a vocal advocate for the preservation and enhancement of the White House, working to uphold its historical integrity and symbolic significance. President Theodore Roosevelt himself entrusted AIA to serve as “perpetual guardian” of the White House’s architectural integrity, a sacred responsibility we honor to this day.

With that historic mandate in mind, we are writing to you on behalf of AIA regarding the proposed \$200 million East Ballroom addition to the White House. The AIA’s longstanding dedication to the preservation and careful adaptation of the White House compels us to offer thoughtful recommendations regarding this significant project. It is precisely because the White House is the “People’s House” that stewardship must be paramount. We recognize that the building has evolved over time; however, any further changes must proceed in a systematic manner that is rooted in a deep understanding of place and a thoughtful, deliberate design process—one that fully appreciates both the magnitude of the proposal and the lasting impact of the interventions. We understand this project may begin as early as September; we urge the Committee to allocate the time necessary for a rigorous process, ensuring decisions are made with the utmost care and consideration.

Although the ballroom project may have secured private funding, the White House is not a private building. The historic edifice at 1600 Pennsylvania Avenue is the People’s House, a national treasure and an enduring symbol of our democracy. Any modifications to it—especially modifications of this magnitude—should reflect the importance, scale, and symbolic weight of the White House itself. So, too, must the *process* rise to the significance of the building and the extent of the proposed alterations. We believe that any material changes to this historic landmark must strictly adhere to established federal processes for public buildings. To that end, we strongly encourage the following:

### **1. Qualifications-Based Selection Process**

The Committee for the Preservation of the White House has a proud history of leadership in stewardship and preservation to maintain and improve the White House for future generations.

While the proposed extension will be privately funded, given the magnitude of the project and the symbolism the White House carries for all Americans, we strongly urge a Qualifications-Based Selection (QBS) process to identify the most qualified architect or design team for this project.

Adherence to the QBS process is the recommended approach for all public projects of national significance and will ensure the selection of professionals who possess the expertise necessary to

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balance the White House's architectural heritage with the functional requirements of a 21st-century presidency. We also encourage a robust, public-facing interdisciplinary feedback process—inviting input from preservation specialists, engineers, security experts such as the Secret Service, and sustainability advisors to address the full scope and complexity of the project.

## **2. Historic-Preservation Review**

A rigorous historic-preservation review is critical to guarantee harmony with James Hoban's neoclassical style and protection of historic sightlines, such as Pennsylvania Avenue and Lafayette Square. Strict adherence to the Secretary of the Interior's Standards (HABS/HAER/HALS) is essential to the safeguarding of the White House architectural legacy. It is critical that the Committee ensures that these standards are rigorously applied.

## **3. Transparency and Public Accountability**

Private funding must not bypass the care and deliberation required for proposing and constructing new additions or making such significant material changes to the White House. Given the White House's symbolic importance, the design and decision-making processes must be transparent and open to public input. Providing public clarity on the funding, procurement, and design selection processes will signal the administration's commitment to accountability and the stewardship of the White House while easing public concerns about the changes being proposed to this national landmark.

## **4. Proportionality and Design Harmony**

The proposed 90,000-square-foot addition raises concerns regarding scale and balance. The design absolutely must harmonize with the White House's existing architectural proportions while preserving its role as both a national museum for the people, and the functional seat of power representative of the people. We urge careful consideration of adjustments that would align the proposed additions more closely with the White House's historic character.

## **5. Collaboration and Expertise**

The AIA offers its full assistance and expertise to ensure that the project fulfills its goals while adhering to current, best preservation practices, and AIA's Framework for Design Excellence. In the spirit of transparency and openness to public feedback, we are ready to support and provide guidance on design criteria, energy efficiency, resiliency, and the fundamental and overarching balance of progress and preservation.

We commend the Committee for its dedication to preserving the White House's legacy. We look forward to discussing these recommendations further and stand ready to assist the Committee in any way necessary.

Sincerely,

Evelyn Lee  
2025 AIA President

Stephen Ayers  
AIA Interim EVP/CEO

# **EXHIBIT W**



# STATEMENT ON THE PROPOSED BALLROOM ADDITION AT THE WHITE HOUSE

October 16, 2025 by SAH Heritage Conservation Committee

The Society of Architectural Historians (SAH) expresses great concern over the proposed ballroom addition to the White House. On July 31, 2025, the White House issued a statement that a 90,000 sq. ft. addition will be made to the White House to incorporate a 650-person capacity ballroom.<sup>1</sup> The project is set to begin in September 2025 and planned to be completed “long before” the end of the President’s term in 2029.<sup>2</sup> Funded privately by the President and other unspecified donors, the approximately \$200 million dollar project involves a major expansion of the East Wing of the White House.<sup>3</sup>

As the leading scholarly organization for architectural historians in North America, SAH limits its advocacy to matters of national and international import. We assess such issues with rigor and deliberation, and do not speak without due consideration of a site’s architectural and cultural significance. The White House is one of the most important historic buildings in the United States. As stated in the ‘Design Guidelines for the White House and President’s Park’ (1997), issued by the National Park Service: “The White House and President’s Park are first and foremost a public trust, an important part of our national heritage.”<sup>4</sup>

While we recognize that the White House is a building with evolving needs, and that it has undergone various exterior and interior modifications since construction began in 1792, the proposed ballroom will be the first major change to its exterior appearance in the last 83 years (since the East Wing in its current form was built in 1942). Therefore, such a significant change to a historic building of this import should follow a rigorous and deliberate design and review process. Since the project announcement, the American Institute of Architects (AIA) has expressed concern and offered recommendations in five areas: establishing a qualifications-based architect selection process, enacting a rigorous historic preservation review, prioritizing transparency and public accountability, considering “proportionality” and “design harmony”,



1. Enact a Comprehensive Preservation Review: Since the last significant exterior change to the White House in 1942, major advances have been made in the field of historic preservation. Federal regulations and best practices now mandate careful study and mitigation of the impacts of new additions and changes to historic buildings. While the White House is exempt from the requirements of Section 106 of the National Historic Preservation Act of 1966 that requires federal agencies to consider the effects of federal projects on historic properties, given the exemplary significance of this site, we urge the White House to follow a meticulous review of any proposed demolition and new construction. From the limited information released to the public, it is unclear whether the proposal involves any demolition of the existing East Wing. Statements by the Chair of the National Capital Planning Commission indicate that “demolition and site preparation work” can proceed outside of any approvals process for the new building.<sup>6\*</sup> More recently, President Trump stated that the ballroom will be “slightly larger” with a new capacity of 900 people as opposed to 650 people that was originally announced, reflecting an almost 40% increase in occupancy.<sup>7</sup> We urge the White House to be transparent and carefully consider the scope, scale and extent of all demolition and new construction. Various design options for the ballroom should be prepared, and a comprehensive process of review and approval should be initiated that prioritizes maintaining the historic character of the building, including but not limited to, architectural scale, proportion and style. In addition, the advisory bodies that exist to better guide preservation of the White House, namely The Committee for the Preservation of the White House, The White House Historical Association and the National Capital Planning Commission, should be consulted and offer their unbiased, thorough and objective assessment and oversight. Moreover, these reviews should be carried out at a pace that allows in-depth deliberations and should not be rushed to meet an aggressive timeline.
2. Evaluate Impacts to the White House Grounds: The proposed addition appears to significantly extend into the landscape south of the existing East Wing. This impacts not only the layout and configuration of the buildings, but also the surrounding landscape that is equally important to the historic character of the White House and the President’s Park (including Lafayette Park and the Ellipse). As such, any changes to the White House grounds should be carefully deliberated and involve appropriate landscape experts.
3. Consider Broader National Impact on Historic Preservation: Known as the “People’s House,” the White House is one of the most significant and visible historic properties in the country. Any project at the White House, whether it involves interior renovation, changes to the landscape, or a new exterior addition, act



the nation.

Sincerely,

**SAH Heritage Conservation Committee**

*Priya Jain, AIA (Chair)*

*Fallon Aidoo, Ph.D.*

*Kenneth Breisch, Ph.D.*

*Pushpita Eshika, Ph.D.*

*Yannick Etoundi*

*Bryan Clark Green, Ph.D.*

*Başak Kalfa, Ph.D.*

*Mary Rzepczynski*

*Mohammad Gharipour, Ph.D. (ex-officio member)*

*Ben Thomas, Ph.D. (ex-officio member)*

*Approved September 16, 2025.*

*\*This statement was revised on October 23 to remove a reference to an incorrectly attributed quote in a report by The Associated Press.*

\_\_\_\_\_

1 “The White House Announces White House Ballroom Construction to Begin,” The White House, July 31, 2025. <https://www.whitehouse.gov/briefings-statements/2025/07/the-white-house-announces-white-house-ballroom-construction-to-begin/>

2 Ibid.

3 Ibid.

4 US Department of the Interior, National Park Service, Design Guidelines: The White House and President’s Park, Washington D.C., December 1997, 7. [https://www.nps.gov/parkhistory/online\\_books/prpa/prpa\\_design\\_guidelines.pdf](https://www.nps.gov/parkhistory/online_books/prpa/prpa_design_guidelines.pdf)

5 “AIA Advocates for Preservation and Transparency in Proposed \$200 million White House Expansion,” American Institute of Architects, August 5, 2025. <https://www.aia.org/about-aia/press/aia-advocates-preservation-and-transparency-proposed-200-million-white-house>

6 Will Scharf, Chair of the National Planning Commission, as quoted in Elizabeth Crisp, “White House Ballroom Demolition Doesn’t Need Approval: Trump-Appointed Panel Chief,” The Hill, September 5, 2025. <https://thehill.com/homenews/5488638-trump-ballroom-demolition-no-approval/>

7 President Donald Trump as quoted in Peter Nicholas, “Trump Says the New White House





Join

Cover photo: The White House from Washington, DC, Public domain, via Wikimedia Commons



SAH thanks the Richard H. Driehaus Foundation and the Alphawood Foundation for their operating support.



Founded in 1940, the Society of Architectural Historians is an international nonprofit membership organization that promotes the study, interpretation and conservation of architecture, design, landscapes and urbanism worldwide.

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# **EXHIBIT X**

**TRUTH.****← Truth Details**

2827 replies

...

**Donald J. Trump**  

@realDonaldTrump

I am pleased to announce that ground has been broken on the White House grounds to build the new, big, beautiful White House Ballroom. Completely separate from the White House itself, the East Wing is being fully modernized as part of this process, and will be more beautiful than ever when it is complete! For more than 150 years, every President has dreamt about having a Ballroom at the White House to accommodate people for grand parties, State Visits, etc. I am honored to be the first President to finally get this much-needed project underway — with zero cost to the American Taxpayer! The White House Ballroom is being privately funded by many generous Patriots, Great American Companies, and, yours truly. This Ballroom will be happily used for Generations to come! President DJT

**7.22k** ReTruths **33.1k** Likes

Oct 20, 2025, 5:23 PM





# **EXHIBIT Y**

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## White House begins demolishing part of East Wing to build ballroom

(02:34)

### [Politics](#)

# White House begins demolition of part of East Wing for Trump's ballroom

By [Kathryn Watson](#)

Updated on: October 21, 2025 / 11:59 PM EDT / CBS News

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*Washington* — Demolition on the White House's East Wing has begun, although President Trump previously said his ballroom addition to the White House wouldn't "interfere" with the building's existing structure.

The [Washington Post](#) first reported on the demolition and published an image of the work. And on Monday, a pool reporter [captured video](#) of part of the East Wing being torn down.

During an event Monday with the Louisiana State University baseball team at the White House, the president remarked on the construction, which he said "just started today."

"You know we're building — right behind us — we're building a ballroom," Mr. Trump said during the celebration of the 2025 NCAA champions in the White House East Room. He pointed out, "Right on the other side, you have a lot of construction going on, which you might hear periodically."

The president also referenced the construction during a meeting with GOP senators on the Rose Garden patio Tuesday. Mr. Trump overhauled the Rose Garden and covered the grass earlier this year to make it easier to host guests.

Watch CBS News

"You probably hear the beautiful sound of construction in the back," he said. "You hear that sound? Oh, that's music to my ears, I love that sound. Other people don't like it. I love it ... I think when I hear that sound, it reminds me of money. In this case, it reminds me of lack of money, because I'm paying for it."



Heavy machinery tears down a section of the East Wing of the White House as construction begins on President Donald Trump's planned ballroom, in Washington, DC, on October 20, 2025.

PEDRO UGARTE/AFP via Getty Images



The president told reporters in September that construction had begun, though at the time, no part of the White House building had been demolished.

White House press secretary Karoline Leavitt shared a social media post by Mr. Trump Monday announcing that "ground has been broken" for the "new, big, beautiful White House Ballroom."

"For more than 150 years, every President has dreamt about having a Ballroom at the White House to accommodate people for grand parties, State visits, etc.," Mr. Trump said in the post. "I am honored to be the first President to finally get this much-needed project underway – with zero cost to the American Taxpayer!"

The East Wing of the White House is fairly small and is where the first lady's office and staff are located.

"It won't interfere with the current building," the president said in July. "It won't be. It'll be near it but not touching it – and pays total respect to the existing building, which I'm the biggest fan of."

The White House says the project, which will cost \$250 million, has been fully funded by private contributions from business and big tech, including Apple, Microsoft and Coinbase. Earlier this month, ballroom donors dined at the White House with Mr. Trump.

By September, a number of companies had pledged to donate \$5 million or more for the addition, multiple sources familiar with the matter said.

The addition was originally planned to be 90,000 square feet, but that figure is likely to increase. The ballroom, which will be used for events that on occasion will include heads of state, is intended to hold 999 people, up from an initial estimate of 650. Mr. Trump said it will have bulletproof glass windows on all sides.

The National Trust for Historic Preservation, a D.C.-based nonprofit chartered by Congress that works to protect historical sites, wrote a letter Tuesday urging a "pause" to "demolition until plans for the proposed ballroom go through the legally required public review processes."

The letter was addressed to the National Capital Planning Commission, the National Park Service and the Commission of Fine Arts.

"While the National Trust acknowledges the utility of a larger meeting space at the White House, we are deeply concerned that the massing and height of the proposed new construction will overwhelm the White House itself—it is 55,000 square feet—and may also permanently disrupt the carefully balanced classical design of the White House with its two smaller, and lower, East and West Wings," the National Trust wrote.

CBS News previously obtained renderings of the ballroom.



Rendering of the White House State Ballroom exterior



Rendering of the White House State Ballroom interior

### More from CBS News

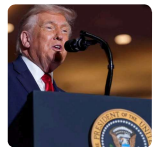
#### 📺 CBS MINNESOTA

Trump to sign AI executive order, sparking fears Minnesota's regulations will be upended



#### 📺 CBS POLITICS

Trump says he's "crushing" inflation as GOP faces affordability concerns



#### 📺 CBS MINNESOTA

Republican senator rebukes Trump's "garbage" remarks about Somali community



#### 📺 CBS TEXAS

Arlington City Council votes down LGBTQ+ anti-discrimination ordinance



In: **White House**

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# **EXHIBIT Z**



## Donald Trump

🕒 This article is more than **1 month old**

# Trump's ballroom blitz sparks chorus of disgust: 'The perfect symbol'

Obama once joked about what a gaudy Trump White House would look like – the president seems bent on proving him right



📷 Heavy machinery tears down a section of the East Wing of the White House as construction begins on Donald Trump's planned ballroom. Photograph: Brendan Smialowski/AFP/Getty Images



**David Smith** *in Washington*

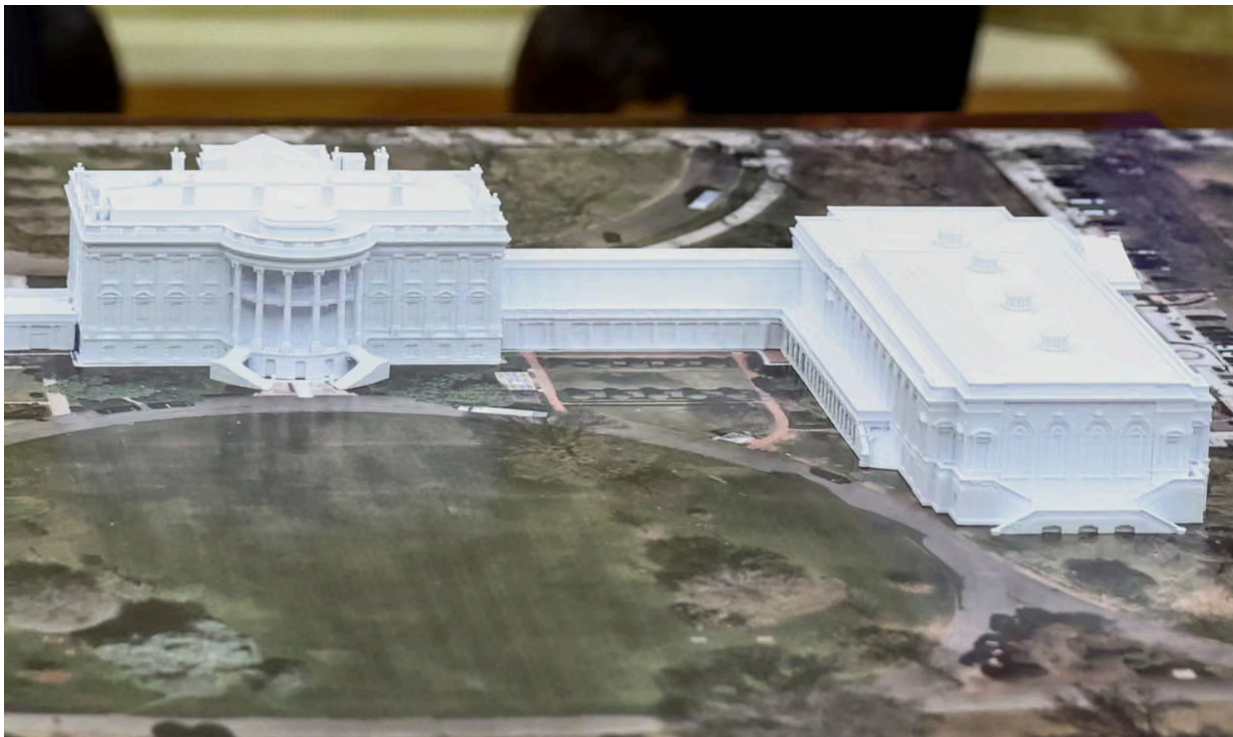
Thu 23 Oct 2025 06.00 EDT

**W**hen Barack Obama roasted Donald Trump at the 2011 [White House Correspondents' Association dinner](#), the icing on the cake was a cartoon illustration of what the White House might look like if Trump ever became US president.

The name “Trump” was emblazoned across the top in giant capital letters, followed by “the White House” in lurid purple cursive, then “hotel casino golf course” and “presidential suite”. The parody imagined gold pillars, a giant crystal chandelier and two scantily clad women sitting at reception.

Fourteen years later, Obama’s vision looks increasingly prophetic as Trump, twice elected and determined to expand presidential power, puts his golden stamp all over the White House. Most dramatically, this week he [sent in a wrecking crew](#) to demolish the facade of the East Wing so he can build a \$250m ballroom.

The image of broken masonry, rubble and steel wires at America’s most famous address was reminiscent of a disaster movie and struck a chord even among people who have become accustomed to shrugging off Trump’s outrageous antics. White House alumni and presidential historians led the chorus of disgust.



📷 A model of the new White House ballroom to be built sits on a table in the Oval Office.  
Photograph: Kevin Lamarque/Reuters

“It’s an abomination,” said [Elaine Kamarck](#), a former official who worked in the building from 1993 to 1997. “It’s typical Trump and it’s going to look

awful. They're knocking down the entire East Wing of the White House. It's not the end of the world but it's just one more reason that Americans are getting sick of King Trump."

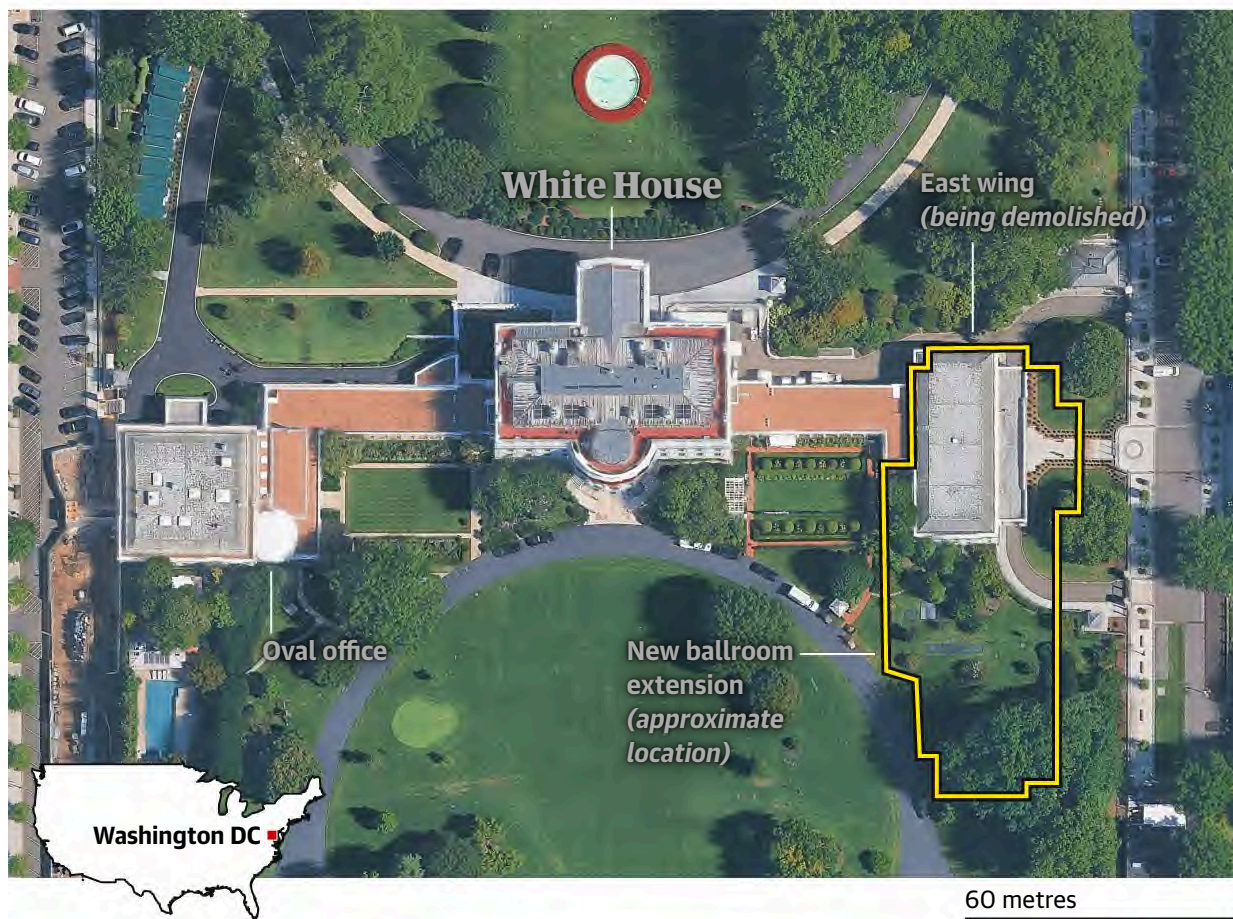
Some metaphors, it was observed, just write themselves. Jonathan Alter, a presidential historian, commented: "It's the perfect symbol of the Trump administration and that's why they didn't want this photograph and that's why it will become iconic and be used in history books for hundreds of years."

"It's not the worst thing that he's done but there's a perfect alignment between the visual image and the major theme of the Trump second term. Early on with Elon Musk it was a chainsaw. Now it's a wrecking ball and that's been their attitude. They've taken a wrecking ball to the rule of law."

The East Wing housed the first lady's offices, a theatre and a visitors' entrance that welcomes foreign dignitaries. Trump - who was a property developer before launching his political career - and senior officials had initially promised that nothing would be demolished during construction.

The president said in July: "It will be beautiful. It won't interfere with the current building. It won't be - it will be near it, but not touching it. And pays total respect to the existing building, which I'm the biggest fan of. It's my favourite."





Guardian graphic. Source: Google Earth, 16 August 2023, The White House

Trump moved ahead with construction **despite a lack of sign-off** from the National Capital Planning Commission, the executive branch agency that has jurisdiction over construction and major renovations to government buildings in the region.

The president says the project will be paid for with private donations and that no public money will be spent on the ballroom. The White House invited some of the donors to an East Room dinner last week but has not released a comprehensive list and breakdown of funds.

Renderings released by the White House suggest a distinct resemblance to the gilded ballroom at Mar-a-Lago, Trump's private club and home in Palm Beach, Florida.

The project also has grown in size since it was announced, going from accommodating 650 seated guests to holding 999 people, big enough to fit an inauguration if needed, and the windows will be bulletproof, Trump has said.

But the National Trust for Historic Preservation has asked the **Trump administration** to pause the demolition, expressing concern that the

proposed 90,000 square foot ballroom “will overwhelm the White House itself”. The executive residence is 55,000 square feet.



📷 A rendering of the White House ballroom. Photograph: McCrery Architects PLLC via the White House

Alter drew a comparison with the British prime minister’s residence in London: “Think about it in terms of putting a glass tower 15 storeys high above 10 Downing Street. What the hell? Or if they knocked out everything to the left and right and put in some garish new buildings that King Charles would hate.”

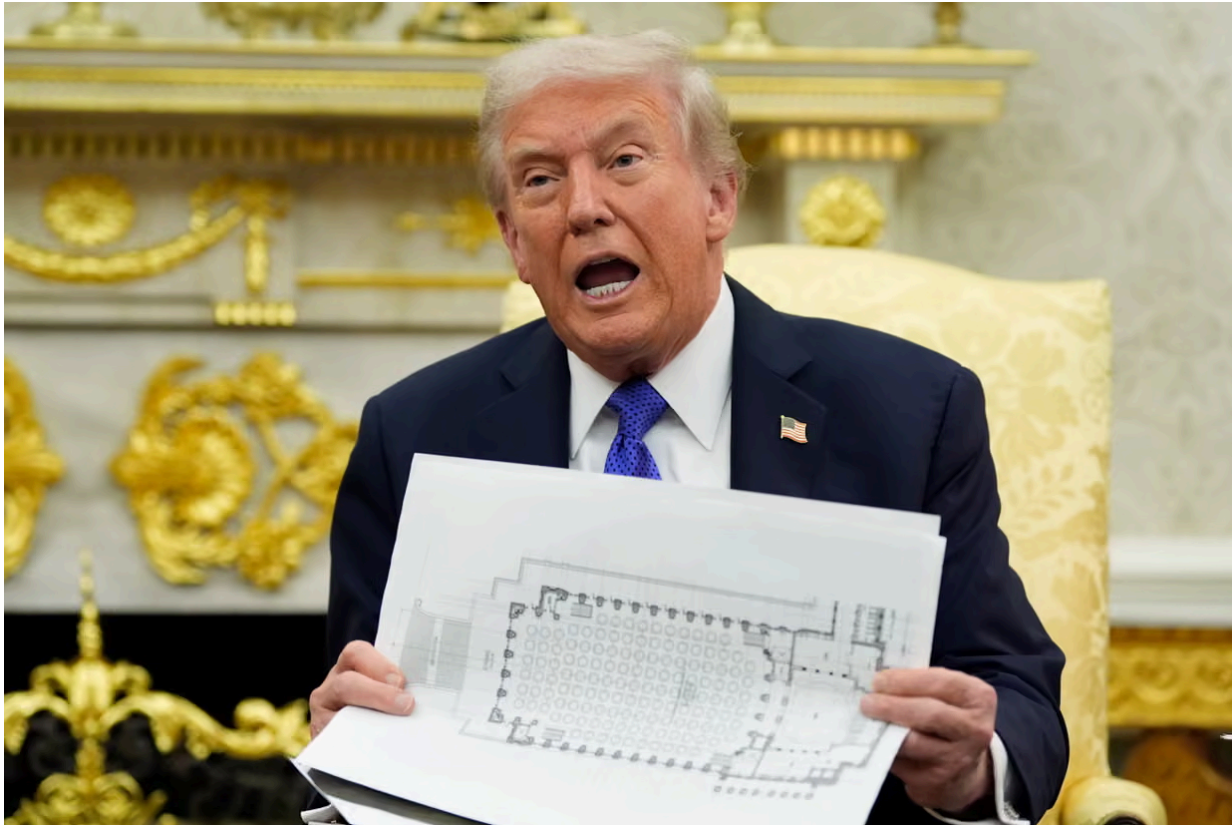
Presidents have added to the White House since construction began in 1792 for a variety of reasons, and Trump aides say his decision to build a ballroom follows that long tradition, dismissing the backlash as “manufactured outrage”. Many past projects were criticised as being too costly or too lavish but eventually came to be accepted.

Theodore Roosevelt added the West Wing to provide dedicated space for the president and key staff, while Franklin Roosevelt added the East Wing, which over time became the home base for the first lady’s staff and social functions.

One of the most significant White House renovations happened under Harry Truman, when the mansion was found to be so structurally unsound that he ordered a complete gutting of the interior that lasted from 1948 to 1952. The project, including Truman’s addition of a balcony to the second floor of the South Portico, was highly controversial.



Other changes include the creation of the Rose Garden during John F Kennedy's administration and Richard Nixon's decision to convert an indoor swimming pool that was built for Franklin Roosevelt's physical therapy into a workspace for the growing White House press corps.



📷 Donald Trump holds an table seating chart of the new White House ballroom in the Oval Office on Wednesday. Photograph: Alex Brandon/AP

Trump has heavily redecorated the Oval Office by adding numerous portraits, busts and gold-toned adornments. He converted the Rose Garden into a stone-covered patio, installed towering flagpoles on the north and south lawns, and decorated an exterior wall with portraits of every president except his immediate predecessor, Joe Biden, who is replaced by an autopen.

Now Trump says the White House needs a major entertaining space and has complained that the East Room, currently the biggest space in the White House, holding about 200 people, is too small. He has frowned on the past practice of presidents hosting state dinners and other big events in tents on the south lawn.

Anita McBride, who was chief of staff to Laura Bush when she was first lady and describes herself as “intimately familiar” with the East Wing, agreed that previous administrations “were prevented from doing the events that they wanted by the size of the rooms as they currently exist. They worked around it by having temporary structures that were put out there every time. The addition of a ballroom is something whose time had come.”



But McBride acknowledged that she had heard from many fellow East Wing alumni this week who find the images of destruction “difficult” and “jarring”. She added: “It doesn’t diminish the stories and the history that was made there and the importance of continuing to preserve and share the stories of the East Wing because it does play a role in White House history. Nothing changes that.”

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# **EXHIBIT AA**

*The* WHITE HOUSE

## ARTICLES

## White House Ballroom Continues Proud Presidential Legacy

The White House

October 21, 2025

In the latest instance of manufactured outrage, unhinged leftists and their Fake News allies are clutching their pearls over President Donald J. Trump's visionary addition of a grand, privately funded ballroom to the White House — a bold, necessary addition that echoes the storied history of improvements and additions from commanders-in-chief to keep the executive residence as a beacon of American excellence.

**FACT: For more than a century, U.S. Presidents have been renovating, expanding, and modernizing the White House to meet the needs of the present day.**

- In 1902, President Theodore Roosevelt built the West Wing — replacing expansive greenhouses constructed during the Jefferson Administration and establishing the modern day executive office wing with a “classically leaning design” — along with a colonial garden and East Terrace, which eventually became the East Wing.
- In 1909, President William Howard Taft remodeled and expanded the West Wing, which included construction of the first Oval Office.
- In 1913, President Woodrow Wilson demolished the colonial garden, modernizing it with a rose garden.
- In 1927, President Calvin Coolidge oversaw the renovation of the upper floors and attic of the White House.
- In 1929, President Herbert Hoover remodeled the West Wing, including reconstruction work in the basement level and remodeling the first floor; after a fire on Christmas Eve, the West Wing was repaired and reopened in 1930.
- In 1934, President Franklin D. Roosevelt overhauled the West Wing, adding a second floor, a larger basement, and a swimming pool, and relocating the Oval



Office to its current location; in 1942, President Roosevelt constructed the East Wing.

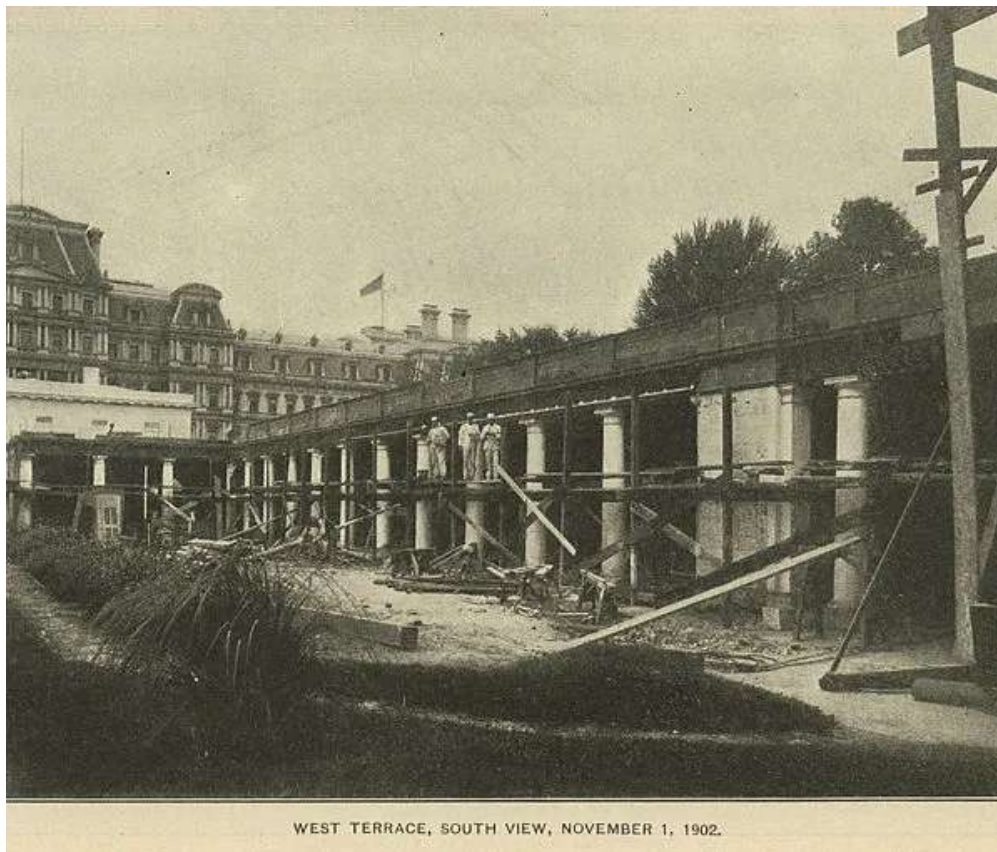
- In 1948, President Harry Truman undertook a “total reconstruction” of the White House’s interior, expanding its foundation and footprint — preserving only its exterior walls.
- In 1962, President John F. Kennedy constructed the modern Rose Garden.
- In 1970, President Nixon converted the swimming pool into the press briefing room; in 1973, he added a bowling alley in the basement.
- In 1975, President Gerald Ford installed an outdoor swimming pool on the South Grounds, financed entirely by private donations.
- In 1993, President Bill Clinton undertook a restoration and refurbishment of the Executive Mansion.
- In 2009, President Barack Obama resurfaced the south-grounds tennis court into a basketball court and added the White House Kitchen Garden on the South Lawn.
- In 2020, President Trump and the First Lady completed a new White House tennis pavilion, refurbishing the White House Tennis Court and Grandchildren’s Garden, as well as constructing a new building.

Now, in 2025, President Trump is carrying forward that legacy, breaking ground on a grand ballroom — a transformative addition that will significantly increase the White House’s capacity to host major functions honoring world leaders, foreign nations, and other dignitaries.

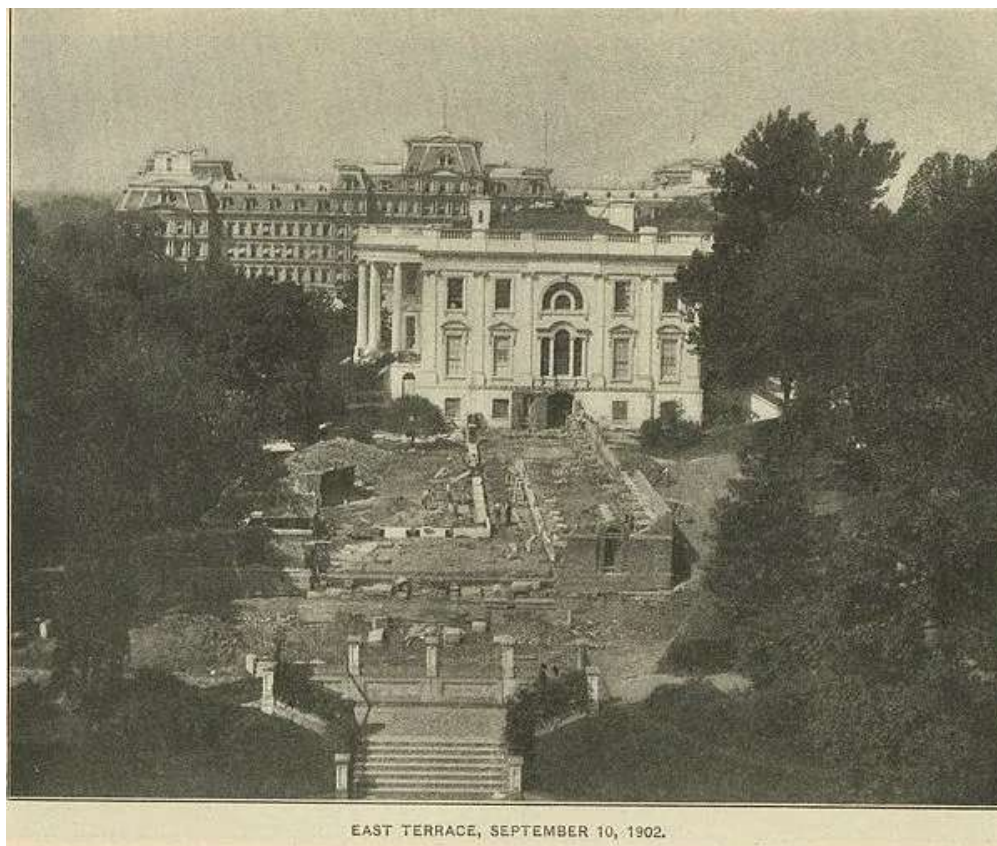
## White House construction projects through the years:



*Newly constructed West Wing with remnants of the old White House Conservatory visible behind the new wing in 1902 ([White House Historical Association](#))*



*Construction of the West Terrace in 1902 (White House Historical Association)*



*Construction of the East Terrace in 1902 (White House Historical Association)*

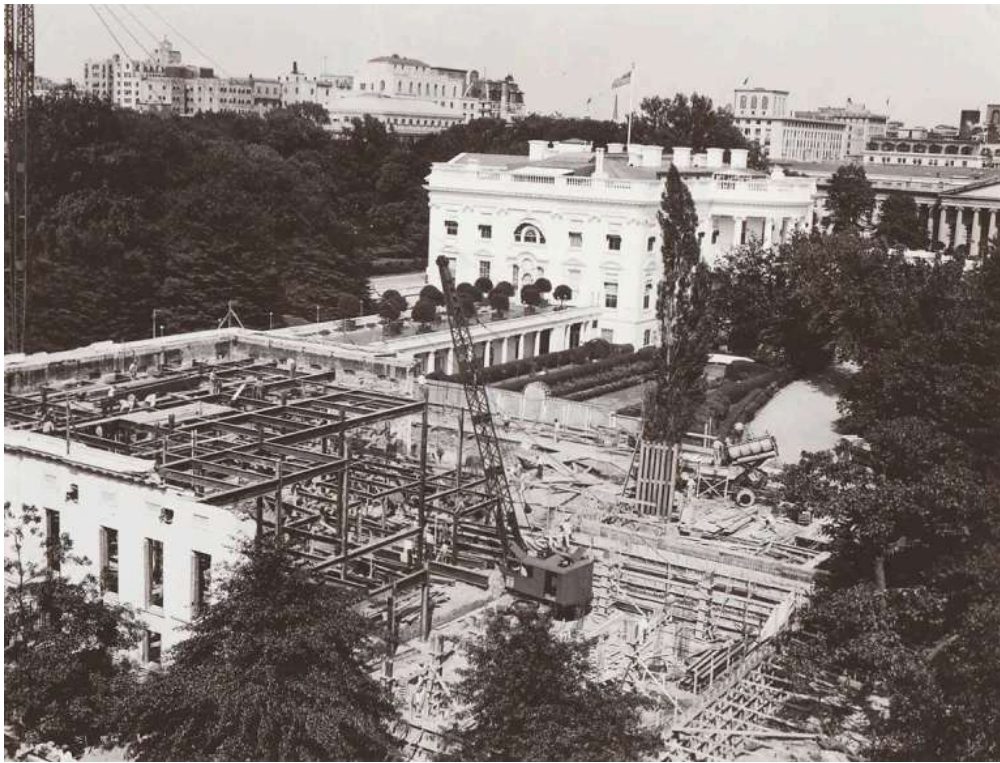




*President Coolidge oversees renovations in 1927 ([Library of Congress](#))*



*Construction of the West Wing expansion in 1934 ([Library of Congress](#))*



*Construction of the West Wing expansion in 1934 (Library of Congress)*

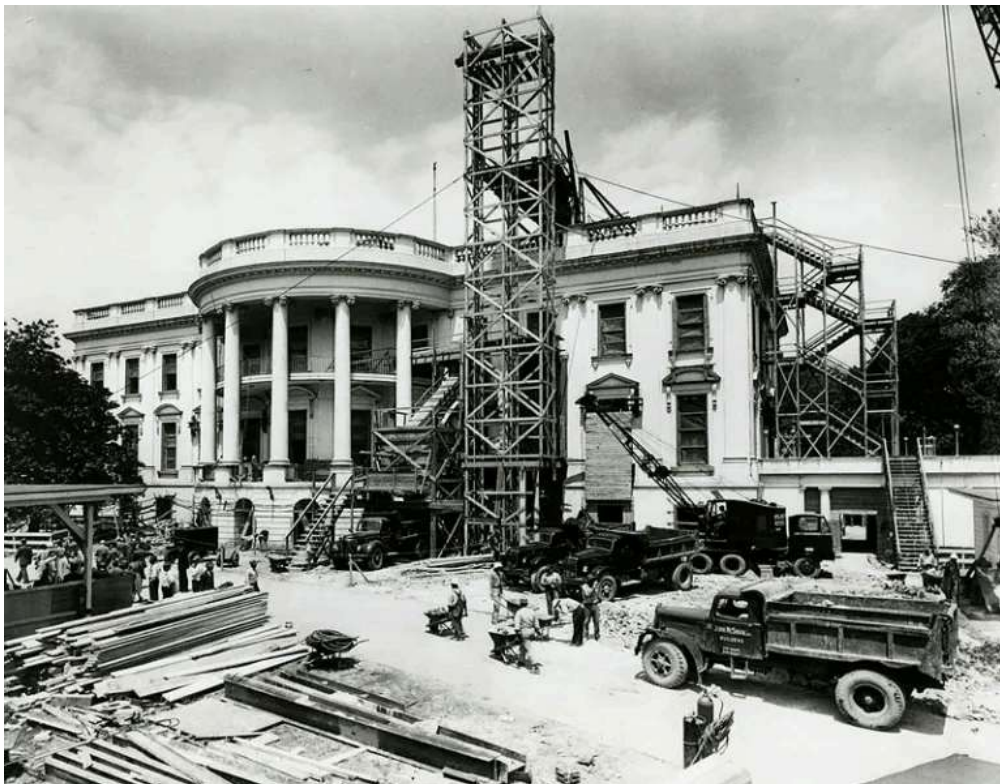


*Renovation work on the White House in 1950 (National Archives)*





*Renovation work on the White House in 1950 (National Archives)*



*Renovation work on the White House in 1950 (National Park Service)*





*The North Portico excavation in 1950 (National Archives)*



*Construction turning the swimming pool into an expanded space for the press in 1970 (White House Collection)*



*President Ford surveys the construction of a new outdoor swimming pool on the South Grounds in 1975 (National Archives)*



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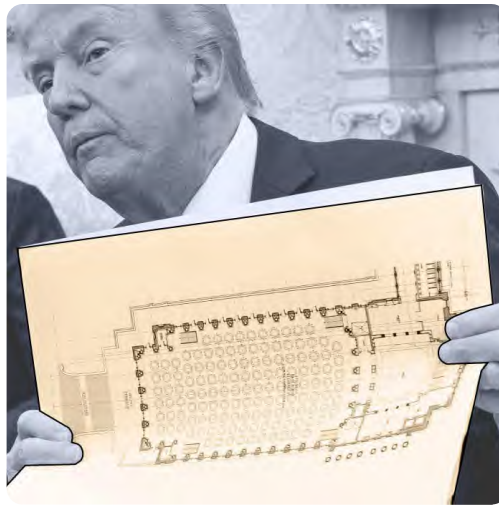
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# **EXHIBIT BB**



# *Trump's Plans for the East Wing Keep Changing. Here's a Look.*

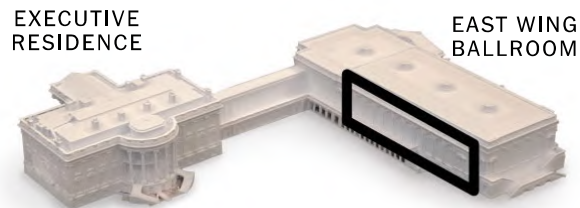
By Marco Hernandez, Junho Lee and Ashley Wu Oct. 24, 2025

Will President Trump's East Wing ballroom hold 650 people, or 999, as Mr. Trump said this week? Or maybe it will hold 1,350 people, according to a drawing Mr. Trump held up in the Oval Office this week.

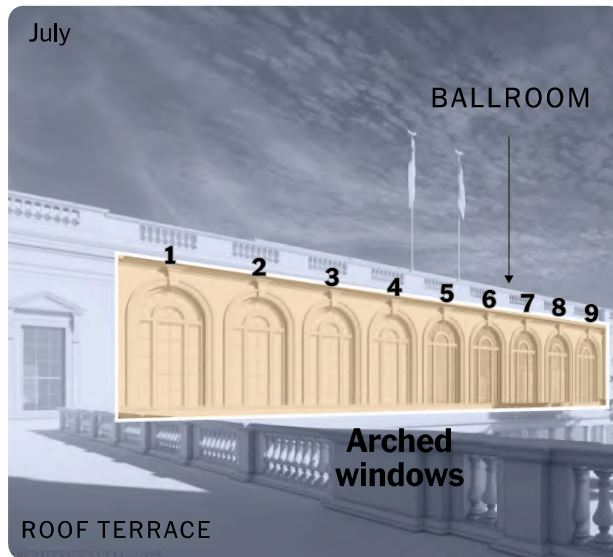
The East Wing was demolished this week, but the ballroom design is still in flux, even though construction was slated to begin in September. The project is supposed to be completed before the end of Mr. Trump's term at a cost of \$300 million — \$100 million more than the previous estimate.

The scope and size of the undertaking was always subject to change as work continued, according to a White House official. Here's a look at what we know about the plans Mr. Trump has floated to remodel the torn-down East Wing:

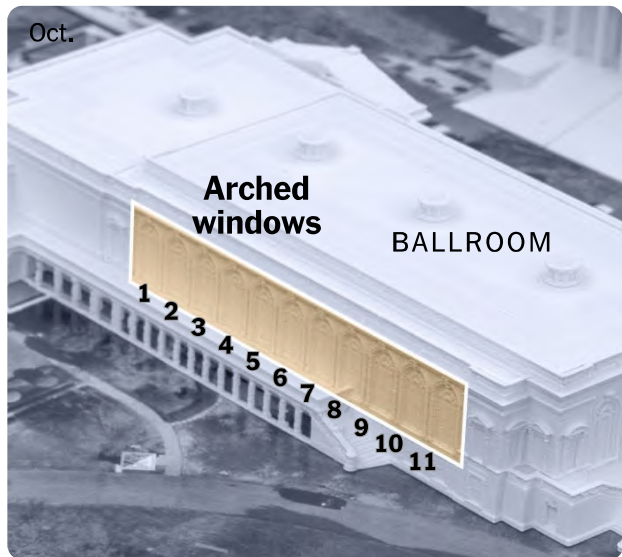




### Windows facing west

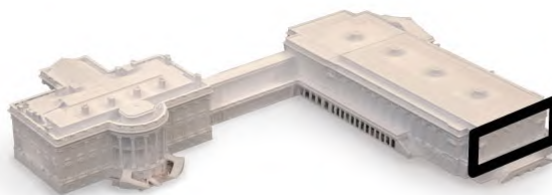


Published on White House website.



Shown by Trump in the Oval Office.

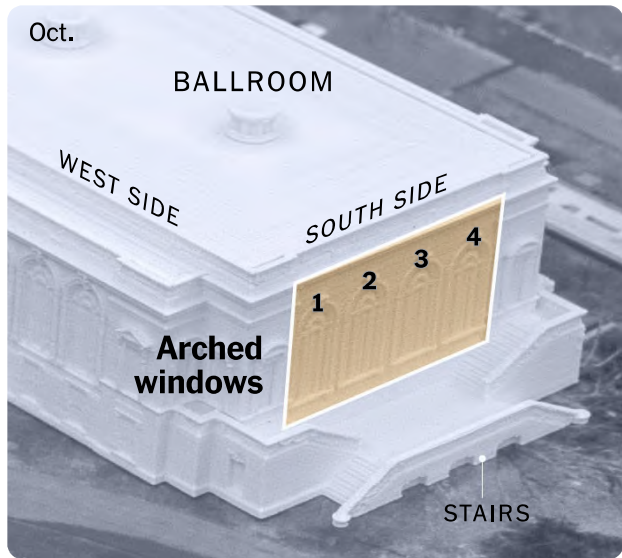
In addition to a floor plan that suggests more seating in the ballroom than Mr. Trump had advertised, the number of west- and south-facing arched windows are different between the plans.



## Windows facing south

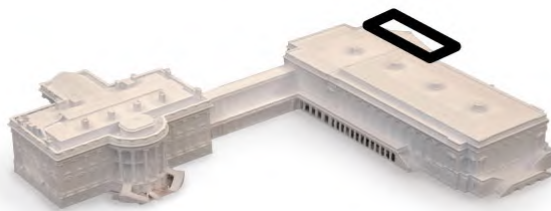


Published on White House website.



Shown by Trump in the Oval Office.

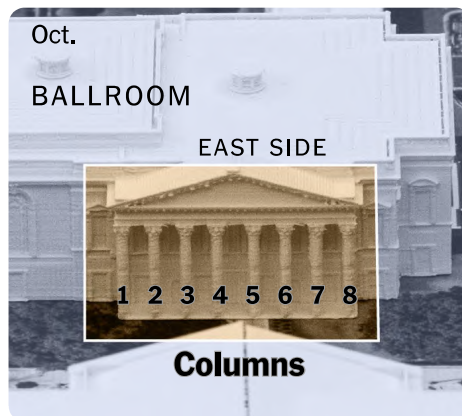
Similarly, there are six columns on the northeast portico in the White House website drawings, and eight columns in the renderings Mr. Trump showed this month. The portico would replace the previous entrance to the East Wing that millions of Americans have walked through for public tours of the White House.



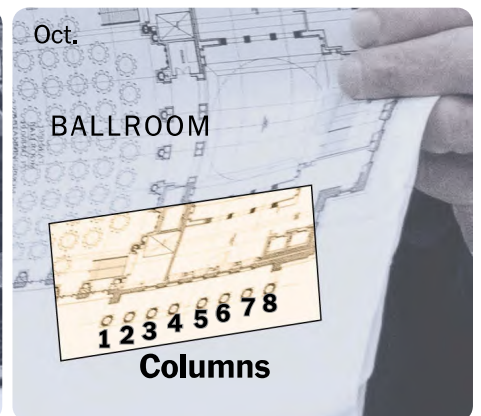
## Northeast portico



Published on White House website.

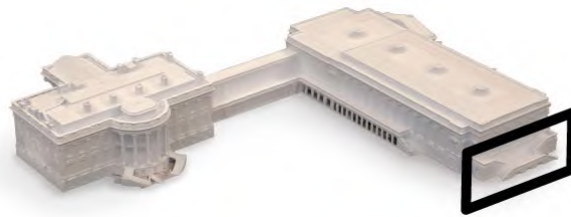


Shown by Trump in the Oval Office.



Shown by Trump in the Oval Office.

The plans Mr. Trump has shown thus far indicate that there will be stairs from the South Lawn leading to the East Wing ballroom. But they show a difference in design: two smaller staircases or one larger one.



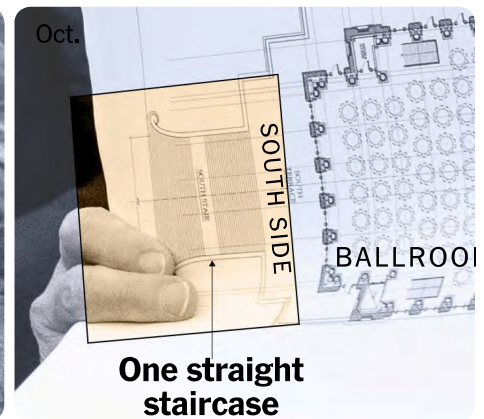
**Stair design**



Published on White House website.



Shown by Trump in the Oval Office.



Shown by Trump in the Oval Office.

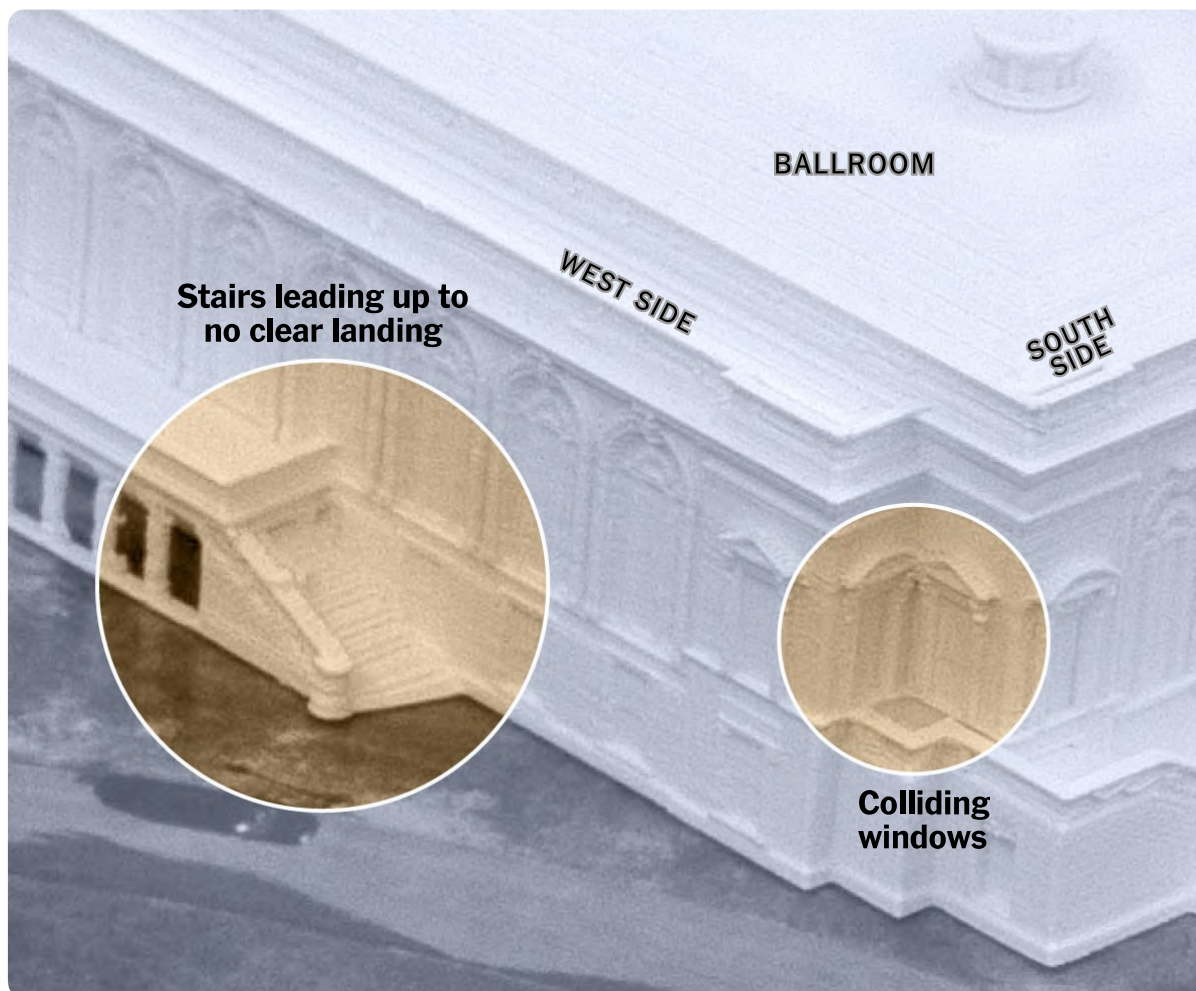
McCrery Architects, the firm hired for the project, did not respond to a request for comment.

Karoline Leavitt, the White House press secretary, defended Mr. Trump's decision to tear down the East Wing on Thursday, acknowledging that his initial plans had changed and arguing that he was not the first president to remodel the White House.

Architects and historians say that it is not unusual for designs to change during a project like this, but that Mr. Trump has not followed the typical process for White House renovations, which normally involve reviews by organizations like the National Capital Planning Commission.



And the various plans Mr. Trump has shared have suggested a hurried process. Along with the differences in the drawings, the model he displayed on Wednesday appeared to have some mistakes, like a staircase leading up from the South Lawn to no clear landing.



Physical model shown by Trump in the Oval Office.

Photos by Doug Mills. Additional reporting by Mika Grondahl.

Note: The analysis is based on ballroom renderings posted on the White House website and a physical model and drawings shown by President Trump in the Oval Office.

# **EXHIBIT CC**

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North Lobby, Suite 500

Washington, DC 20004

Tel: 202.482.7200

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**November 18, 2025 – \* Due to the government shutdown, the items originally on the October meeting agenda were moved to December. \***

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Attached is the list of **agenda items** tentatively scheduled for the **National Capital Planning Commission meeting on Thursday, December 4, 2025, 1:00 PM** and at subsequent meetings. **The public can participate in this NCPC Commission meeting either online or in person. Further details are provided on NCPC's website, [www.ncpc.gov](http://www.ncpc.gov).**

Commission meetings are open to the public, and individuals or groups wishing to offer their viewpoint may provide comments on any project listed on the Tentative Agenda that requires Commission approval. Anyone wishing to testify about an Action Item must register and provide their testimony in writing by the deadlines shown below.

The Tentative Agenda classification of projects as **Proposed Action Items, Delegated Items, and Exceptions** is preliminary and subject to change prior to the Commission meeting. Understanding the circumstances for such changes will help the public to participate in the Commission's review process. Project classifications are as follows:

- **Action Items** are projects that will be presented and discussed at the Commission meeting. Members of the public are invited to give testimony on these projects. Some projects listed as *Proposed Action Items* on the Tentative Agenda will be moved to the **Consent Calendar** if no speakers have registered by the deadline (see schedule below). The Commission votes on the Consent Calendar Items but does not hear a presentation or public testimony.
- **Delegated Items** are projects that the Commission delegates to the Chair, or Executive Director. Members of the public can submit written comments on Delegated Items.
- **Exceptions** are types of projects where NCPC staff determines that a project is exempt from Commission review, based on certain criteria. Members of the public can submit written comments on Exceptions.

Please follow the schedule below to ensure that you meet the deadlines to express your views:

November 26, 2025 12:00 Noon	Deadline for registering to speak at the Commission meeting on <b><i>Proposed Action Items</i></b> . If no member of the public signs up to speak on a <b><i>Proposed Action Item</i></b> by this deadline, then the project may be moved to the Consent Calendar and acted on by the Commission without presentation or discussion.
November 28, 2025	Copies of the Executive Director's Recommendations on <b><i>Action Items, Consent Calendar Items, and Delegated Items</i></b> become available to the public on the Friday prior to the Commission meeting day.
December 3, 2025 12:00 Noon	Deadline for registering to speak on <b><i>Action Items</i></b> listed on NCPC's website: <a href="http://www.ncpc.gov">www.ncpc.gov</a> ; or to submit written comments on <b><i>Action Items, Consent Calendar Items, and Delegated Items</i></b> for distribution to the Commission for consideration on December 4. Anyone testifying at the meeting should submit a copy of their testimony by this deadline.



Please note our policy for those **speaking on behalf of an organization**: Prior to giving testimony at each Commission meeting, please submit to NCPC an official letter from your organization, stating that your testimony is authorized by the organization.

Submission materials can be reviewed online at [www.ncpc.gov](http://www.ncpc.gov). If you wish to communicate your views in writing or in person on any of the items listed on the agenda, **please visit the following web page** <https://go.ncpc.gov/register>, email [info@ncpc.gov](mailto:info@ncpc.gov), or call **(202) 482-7200**. Public views on non-federal plans and projects should be limited to their effect on federal interests in the National Capital Region.

The Final Agenda will be available at [www.ncpc.gov](http://www.ncpc.gov) on November 28, 2025. Agenda items are occasionally withdrawn prior to the Commission meeting. Please [email](#) or call NCPC to confirm any item of particular interest.

### December 4, 2025 MEETING

#### **File Number Items**

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#### **PROPOSED ACTION ITEMS**

- |      |  |
|------|--|
| 8449 | <p>United States Department of the Interior, National Park Service, 300 Independence Avenue, SW, Washington, DC – Fallen Journalists Memorial</p> <p>(Commission action requested: approval of preliminary site development plans pursuant to 40 U.S.C. § 8905)</p>                              |
| 8699 | <p>United States Department of the Interior, National Park Service, Washington, DC – Women's Suffrage National Monument Site Selection</p> <p>(Commission action requested: approval of comments on site selection pursuant to 40 U.S.C. § 8905)</p>   |
| 8703 | <p>Union Station Redevelopment Corporation, 50 Massachusetts Avenue, NE, Washington, DC – Washington Union Station Lighting Upgrades</p> <p>(Commission action requested: approval of comments on concept plans pursuant to 40 U.S.C. § 8722(b)(1) and (d))</p>                                  |
| 7466 | <p>Washington Metropolitan Area Transit Authority, 1200 Independence Avenue, SW, Washington, DC – Smithsonian Metrorail Station Vent Modifications</p> <p>(Commission action requested: approval of preliminary and final site development plans pursuant to 40 U.S.C. § 8722(b)(1) and (d))</p> |

8700 United States General Services Administration, 1900 E Street, NW, Washington, DC – Theodore Roosevelt Federal Building T-Mobile Antenna Modifications

(Commission action requested: approval of preliminary and final building plans pursuant to 40 U.S.C. § 8722(b)(1) and (d))

8648 United States Department of the Interior, National Park Service, Montgomery County, Maryland – Clara Barton Parkway Cantilever Replacement

(Commission action requested: approval of preliminary site development plans pursuant to 40 U.S.C. § 8722(b)(1))

### **PROPOSED DELEGATED ITEMS**

8701 Smithsonian Institution, 3001 Connecticut Avenue, NW, Washington, DC – National Zoological Park Great Flight Aviary Accessible Walkway

(Commission action requested: approval of preliminary site development plans pursuant to 40 U.S.C. § 8722(b)(1) and (d))

8702 Smithsonian Institution, 3001 Connecticut Avenue, NW, Washington, DC – National Zoological Park Elephant Yards Stormwater Mitigation Repair

(Commission action requested: approval of preliminary and final site development plans pursuant to 40 U.S.C. § 8722(b)(1) and (d))

8697 United States General Services Administration, 810 Vermont Avenue NW, Washington, DC – Veterans Affairs Headquarters Building T-Mobile Antenna Modifications

(Commission action requested: approval of preliminary and final building plans pursuant to 40 U.S.C. § 8722(b)(1) and (d))

8698 United States General Services Administration, 200 Independence Avenue, SW, Washington, DC – Hubert H. Humphrey Federal Building T-Mobile Antenna Modifications

(Commission action requested: approval of preliminary and final building plans pursuant to 40 U.S.C. § 8722(b)(1) and (d))

8719 United States Department of Homeland Security, 9200 Powder Mill Road, Laurel, Maryland – James J. Rowley Training Center Tactical Village Improvements

(Commission action requested: approval of preliminary and final site and building plans pursuant to 40 U.S.C. § 8722(b)(1))

**PROPOSED EXCEPTIONS**

8354 District of Columbia Department of Buildings, Office of the Surveyor, 1351 Alabama Avenue, SE, Washington, DC – Proposed Elimination of a Building Restriction Line and Highway Plan Amendment in Square 5914 - S.O. 22-01642

(Commission action requested: approval of highway plan amendment pursuant to DC Code § 9-103.02)

8717 District of Columbia Department of Buildings, Office of the Surveyor, 4105 46th Street NW, Washington, DC – Closing of a Public Alley in Square 1560 - S.O. 24-05577

(Commission action requested: approval of comments to the Council of the District of Columbia pursuant to DC Code § 9-202.02)

**INFORMATION PRESENTATION**

8721 New Stadium at RFK Campus

(Information presentation; no action requested)

**PROJECTS ANTICIPATED FOR REVIEW OVER THE NEXT SIX MONTHS**

MP 314 Tidal Basin Development Plan  
8712 National Mall Telecommunications Infrastructure Concept Plan  
7819B Long Bridge Corridor Project – South Section  
MP312 Glen Echo Management Plan Amendment  
8718 New DC Engine Company 7  
8720 Joint Base Myer-Henderson Hall Antenna



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Meghan Hottel-Cox  
Secretary to the Commission



# **EXHIBIT DD**

 [www.washingtonpost.com /politics/2025/10/28/trump-arts-commission-firings-ballroom-arch/](https://www.washingtonpost.com/politics/2025/10/28/trump-arts-commission-firings-ballroom-arch/)

## White House fires arts commission expected to review Trump construction projects

Dan Diamond : 5-7 minutes : 10/28/2025

The White House on Tuesday fired all six members of the Commission of Fine Arts, an independent federal agency that had expected to review some of President Donald Trump's construction projects, including his [planned triumphal arch](#) and [White House ballroom](#).

"On behalf of President Donald J. Trump, I am writing to inform you that your position as a member of the Commission of Fine Arts is terminated, effective immediately," reads an email reviewed by The Washington Post that was sent to one of the commissioners by a staffer in the White House presidential personnel office.

The commission, which was established by Congress more than a century ago and traditionally includes a mix of architects and urban planners, is charged with providing advice to the president, Congress and local government officials on design matters related to construction projects in the capital region. Its focus [includes](#) government buildings, monuments and memorials. White House officials have traditionally sought the agency's approval.

President Joe Biden appointed the six sitting commissioners to four-year terms, several of which would have extended through 2028. Their termination comes as the White House gears up for several Trump construction projects, including his [planned \\$300 million White House ballroom](#), and seeks to install allies on key review boards.



### **Follow** Trump's second term

A White House official confirmed that the Commission of Fine Arts members had been terminated.

"We are preparing to appoint a new slate of members to the commission that are more aligned with President Trump's 'America First' policies," said the official, who spoke on the condition of anonymity to discuss personnel matters.

Bruce Becker, an architect who was appointed to the commission last year and was terminated Tuesday, praised its work in an interview Tuesday night. The agency "plays an important role in shaping the way the public experiences our nation's capital and the historic buildings it contains, which serve as symbols of our democracy," Becker said.

The White House in July also fired Biden appointees from the National Capital Planning Commission, [another urban-planning](#) agency that is required to review external construction projects at the White House. Trump allies now make up a majority of the 12-member board, including its chairman, Trump staff secretary Will Scharf.

The White House has said it will soon send Trump's ballroom plans to the National Capital Planning Commission, which will decide whether to approve the new building. White House officials previously declined to comment on whether they planned to also send the plans to the Commission of Fine Arts, and whether approval from that agency was necessary for the ballroom project to move forward. An official who spoke on the condition of anonymity to discuss ongoing construction said that "all necessary agencies and entities who need to review the project" were in the process of being consulted.

The new White House ballroom marks one of the biggest changes to the presidential residence in decades — raising questions about tradition, legacy and power. (Video: The Washington Post)

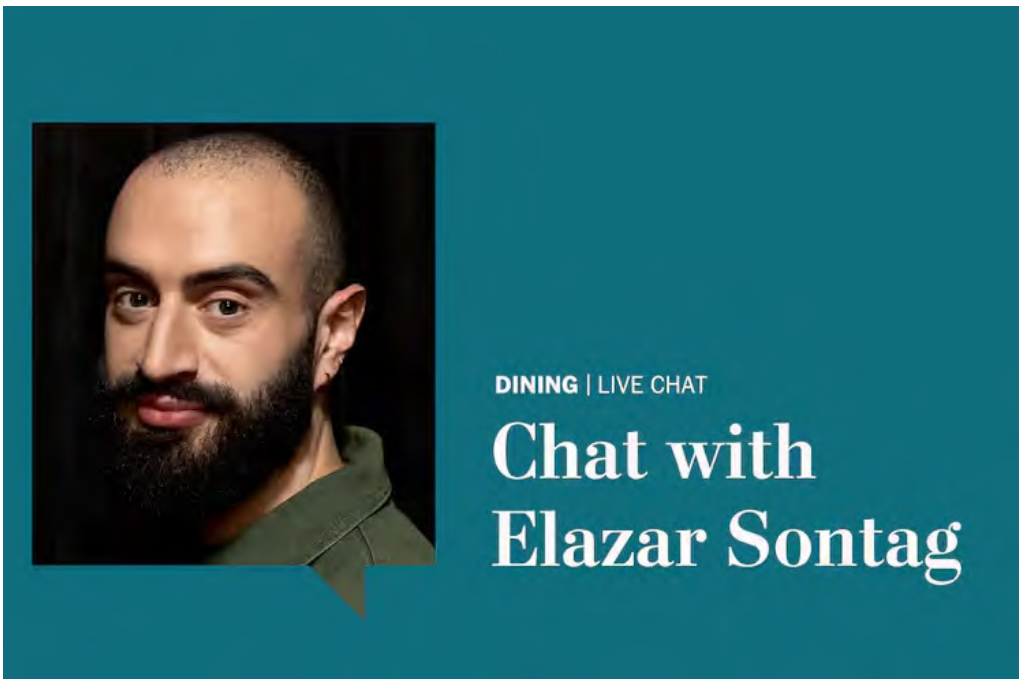
The Commission of Fine Arts has traditionally reviewed and voted on major projects at the White House, such as approving a [tennis pavilion](#) project overseen by first lady Melania Trump in 2019. But President Trump may sidestep its review of his ballroom, citing historical precedent and his desire to rush its construction, architectural experts said. During a 1947 battle with President Harry S. Truman, who sought to add a balcony to the White House, CFA's then-chairman said the panel could serve only in an "advisory" role to the president. Truman ultimately proceeded with his plans, setting an example that Trump appears ready to follow.

White House officials, however, are considering building the arch on federal land that does not qualify for the same exemptions as the White House. As a result, some of the fired commissioners had expected to play a role in reviewing that design.

They also said they had [expected to review](#) Trump's planned ballroom, expressing concern that the president abruptly tore down the White House's East Wing last week without undergoing a review by their commission.

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"Were it not for today's terminations, CFA would look forward to a full review of the plans for the new structure that will replace the East Wing," Becker said.

Biden in 2021 [fired Trump appointees](#) from the Commission of Fine Arts and the National Capital Planning Commission, with Biden administration officials at the time defending the moves as an effort to diversify the panels. It was the first time in the commissions' history that a president had forced out sitting members, drawing some criticism from art and architecture experts that Biden was politicizing its work.

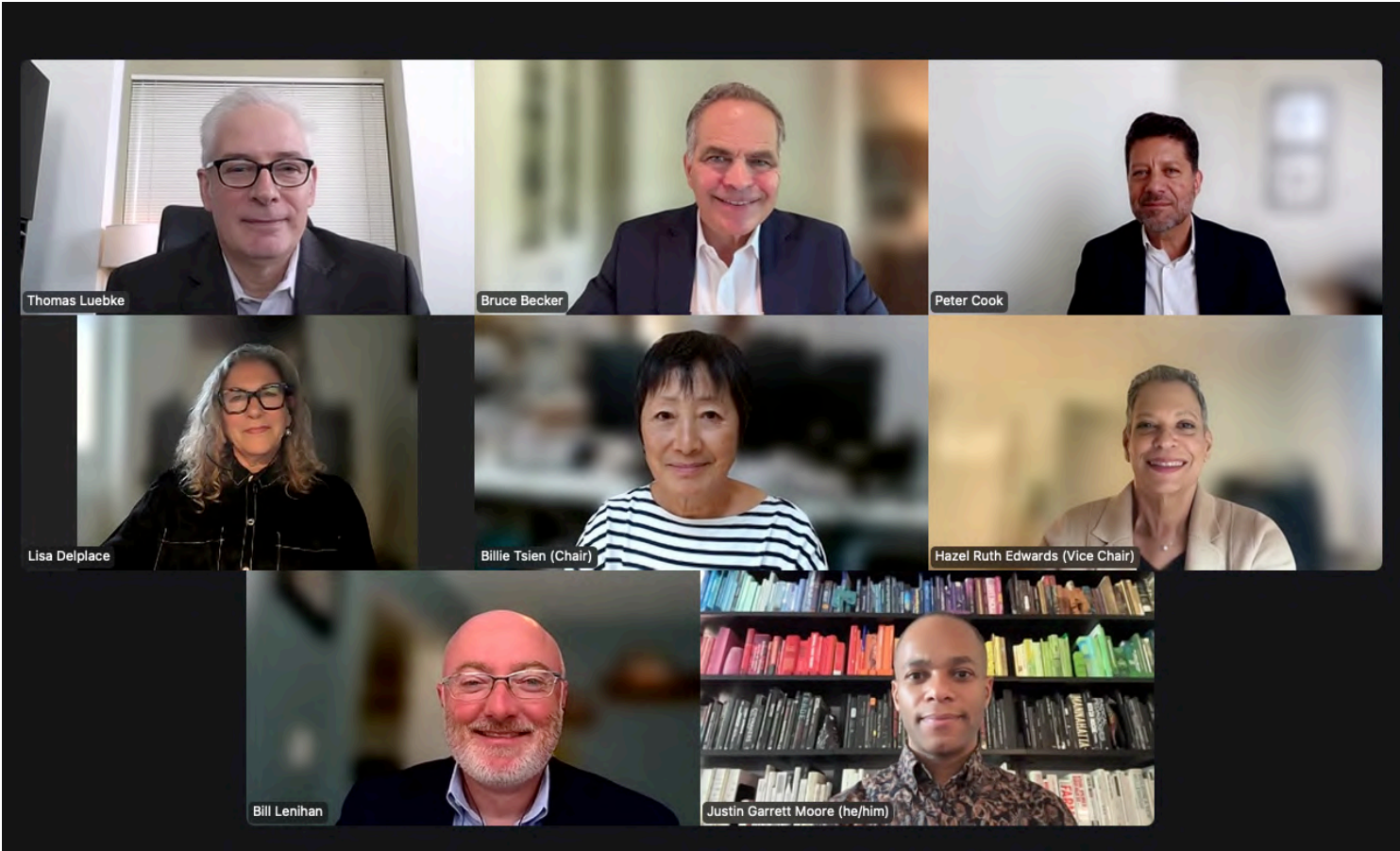
The Commission of Fine Arts has been without a leader since earlier this year, when architect Billie Tsien, who had chaired the panel since 2021, resigned. Tsien, who is helping construct the [Obama Presidential Center in Chicago](#), told The Post that she was removing herself from the CFA because her term expired in May and she assumed that Trump would not reappoint her.

# **EXHIBIT EE**

MEETING STATUS

The Old Georgetown Board will meet on 11 December 2025 to review cases originally submitted for both the 6 November and 11 December OGB meetings. For the latest information and to REGISTER for public meetings, click here. (updated: 12/8/25)

WHO WE ARE



Members of the Commission of Fine Arts meeting via videoconference, September 2024. Top row: Thomas Luebke (Secretary), Bruce Becker, Peter Cook. Middle row: Lisa Delplace, Billie Tsien (Chair), Hazel Ruth Edwards (Vice Chair). Bottom row: Bill Lenahan, Justin Garrett Moore. (Image credit: CFA)

The Commission of Fine Arts

The Commission of Fine Arts is composed of seven members with expertise in the arts. Appointed by the President, Commission members serve four-year terms without compensation. The chairman and vice chairman are elected by the members.

The current members of the Commission are:

Vacant
Vacant
Vacant



Vacant
Vacant
Vacant
Vacant

### Past members of the Commission of Fine Arts

## The Old Georgetown Board

Under the Old Georgetown Act, the Old Georgetown Board of Architectural Consultants is a panel of three architects who advise the Commission of Fine Arts on projects in the Old Georgetown historic district. The architects are appointed by the Commission and serve three-year terms without compensation.

The current members of the Board are:

<b>Mary Kay Lanzillotta</b> , FAIA, Chair	Current term of service began 4 September 2025
<b>Amy Weinstein</b> , FAIA	Current term of service began 1 September 2023
<b>Ashley Wilson</b> , FAIA, ASID	Current term of service began 5 September 2024

### Past members of the Old Georgetown Board

## Staff

The Staff of the Commission of Fine Arts, which administers the operations of the Commission and the Old Georgetown Board, consists of twelve full-time civil service employees. The current members of the CFA staff are:

<b>Thomas Luebke</b> , FAIA	<b>Secretary</b>
Sarah Batcheler, AIA, LEED AP	<b>Assistant Secretary</b>
Jessica Amos	<b>Historic Preservation Specialist, Old Georgetown Act</b>
Christopher Berger	<b>Historic Preservation Specialist, Old Georgetown Act</b>
Mary Catherine Bogard	<b>Historic Preservation Specialist, Old Georgetown Act</b>
Anna Brown	<b>Senior Administration/Policy Advisor</b>
Kay Fanning, PhD	<b>Historian</b>

Daniel Fox	Senior Advisor, Design Review & Historic Preservation
Carlton Hart	Senior Urban Planner
Vacant	Chief Operating Officer
Vivian Lee	Architect, Shipstead-Luce Act
Vacant	Technical Information Specialist
Vacant	Architect and Planner
Zakiya Walters	Administrative Officer

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

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

*Plaintiff,*

v.

**NATIONAL PARK SERVICE;**

**JESSICA BOWRON, in her official capacity  
as ACTING DIRECTOR, NATIONAL PARK  
SERVICE;**

**JOHN STANWICH, in his official capacity as  
SUPERINTENDENT, THE WHITE HOUSE  
AND PRESIDENT’S PARK;**

**DEPARTMENT OF THE INTERIOR;**

**DOUGLAS BURGUM, in his official capacity  
as SECRETARY OF THE INTERIOR;**

**GENERAL SERVICES ADMINISTRATION;**

**MICHAEL J. RIGAS, in his official capacity  
as ACTING ADMINISTRATOR, GENERAL  
SERVICES ADMINISTRATION; and**

**DONALD J. TRUMP, in his official capacity  
as PRESIDENT OF THE UNITED STATES,**

*Defendants.*

Civil Action No. 25-4316

**[PROPOSED] ORDER GRANTING NATIONAL TRUST’S  
MOTION FOR TEMPORARY RESTRAINING ORDER**

This matter is before the Court on the motion of plaintiff, the National Trust for Historic Preservation in the United States (“National Trust”), for a temporary restraining order against defendants the National Park Service; Jessica Bowron, in her official capacity as Acting Director, National Park Service; John Stanwich, in his official capacity as Superintendent, the White House and President’s Park; the Department of the Interior; Douglas Burgum, in his official capacity as Secretary of the Interior; the General Services Administration; Michael J. Rigas, in his official



capacity as Acting Administrator, General Services Administration; and Donald J. Trump, in his official capacity as President of the United States (together, “Defendants”). Having considered the motion, the memorandum in support, other papers filed in connection therewith, and the record in this case, and having otherwise been fully advised, it is hereby **ORDERED** that the National Trust’s motion for a temporary restraining order is **GRANTED**. It is further

**ORDERED** that the Defendants, and any agents of the Defendants or any other persons working at their direction or in active concert therewith, or subject to the Defendants’ control, are **ENJOINED** from taking any and all actions in furtherance of the physical development of the Ballroom Project, including but not limited to any further demolition, site preparation work, subsurface work, removal of debris, removal of soil, landscape alteration, vegetation or tree removal, grading, excavation, digging, trenching, boring, filling, blasting, laying of foundations, laying of utilities, pile driving, construction equipment installation, or other construction or related work at the site of the former East Wing, other than specific limited actions, for which Defendants must request and receive written approval of this Court, necessary for the sole purpose of ensuring safe physical conditions at the site while this injunction is in effect;

**ORDERED** that no such work shall proceed until the Ballroom Project has been reviewed and approved of by the National Capital Planning Commission, and reviewed by the Commission of Fine Arts, *see* 40 U.S.C. §§ 8721-8722, 9102; 45 C.F.R. §§ 2101.1-2101.2; until an adequate environmental assessment and an adequate environmental impact statement have been prepared and published under the National Environmental Policy Act, 42 U.S.C. § 4331 *et seq.*; and until Congress has expressly authorized the construction of the Ballroom, *see* 40 U.S.C. § 8106;

**ORDERED** that the Defendants’ counsel shall provide written notice of this Order to all officers, agents, successors, servants, employees, and attorneys of the Defendants, and any other

persons working at their direction or in active concert therewith, or subject to the Defendants' control, and shall file a copy of the notice on the docket at the same time;

**ORDERED** that the Defendants shall file a status report, apprising the Court of the status of their compliance with this Order; and

**ORDERED** that the security requirement is hereby waived. *See* Fed. R. Civ. P. 65(c); *Nat'l Council of Nonprofits v. OMB*, 775 F. Supp. 3d 100, 130 (D.D.C. 2025).

Dated this \_\_\_\_ day of \_\_\_\_\_, 2025      BY THE COURT:

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United States District Judge

**ATTORNEYS AND PARTIES TO BE NOTIFIED**

***Pursuant to Local Rule 7(k)***

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Washington, DC 20500



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

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

*Plaintiff,*

v.

**NATIONAL PARK SERVICE;**

**JESSICA BOWRON, in her official capacity  
as ACTING DIRECTOR, NATIONAL PARK  
SERVICE;**

**JOHN STANWICH, in his official capacity as  
SUPERINTENDENT, THE WHITE HOUSE  
AND PRESIDENT’S PARK;**

**DEPARTMENT OF THE INTERIOR;**

**DOUGLAS BURGUM, in his official capacity  
as SECRETARY OF THE INTERIOR;**

**GENERAL SERVICES ADMINISTRATION;**

**MICHAEL J. RIGAS, in his official capacity  
as ACTING ADMINISTRATOR, GENERAL  
SERVICES ADMINISTRATION; and**

**DONALD J. TRUMP, in his official capacity  
as PRESIDENT OF THE UNITED STATES,**

*Defendants.*

Civil Action No. 25-4316

**[PROPOSED] ORDER GRANTING NATIONAL TRUST’S  
MOTION FOR PRELIMINARY INJUNCTION**

This matter is before the Court on the motion of plaintiff, the National Trust for Historic Preservation in the United States (“National Trust”), for a preliminary injunction against defendants the National Park Service; Jessica Bowron, in her official capacity as Acting Director, National Park Service; John Stanwich, in his official capacity as Superintendent, the White House and President’s Park; the Department of the Interior; Douglas Burgum, in his official capacity as Secretary of the Interior; the General Services Administration; Michael J. Rigas, in his official

capacity as Acting Administrator, General Services Administration; and Donald J. Trump, in his official capacity as President of the United States (together, “Defendants”). Having considered the motion, the memorandum in support, other papers filed in connection therewith, and the record in this case, and having otherwise been fully advised, it is hereby **ORDERED** that the National Trust’s motion for a preliminary injunction is **GRANTED**. It is further

**ORDERED** that the Defendants, and any agents of the Defendants or any other persons working at their direction or in active concert therewith, or subject to the Defendants’ control, are **ENJOINED** from taking any and all actions in furtherance of the physical development of the Ballroom Project, including but not limited to any further demolition, site preparation work, subsurface work, removal of debris, removal of soil, landscape alteration, vegetation or tree removal, grading, excavation, digging, trenching, boring, filling, blasting, laying of foundations, laying of utilities, pile driving, construction equipment installation, or other construction or related work at the site of the former East Wing, other than specific limited actions, for which Defendants must request and receive written approval of this Court, necessary for the sole purpose of ensuring safe physical conditions at the site while this injunction is in effect;

**ORDERED** that no such work shall proceed until the Ballroom Project has been reviewed and approved of by the National Capital Planning Commission, and reviewed by the Commission of Fine Arts, *see* 40 U.S.C. §§ 8721-8722, 9102; 45 C.F.R. §§ 2101.1-2101.2; until an adequate environmental assessment and an adequate environmental impact statement have been prepared and published under the National Environmental Policy Act, 42 U.S.C. § 4331 *et seq.*; and until Congress has expressly authorized the construction of the Ballroom, *see* 40 U.S.C. § 8106;

**ORDERED** that the Defendants’ counsel shall provide written notice of this Order to all officers, agents, successors, servants, employees, and attorneys of the Defendants, and any other

persons working at their direction or in active concert therewith, or subject to the Defendants' control, and shall file a copy of the notice on the docket at the same time;

**ORDERED** that the Defendants shall file a status report, apprising the Court of the status of their compliance with this Order; and

**ORDERED** that the security requirement is hereby waived. *See* Fed. R. Civ. P. 65(c); *Nat'l Council of Nonprofits v. OMB*, 775 F. Supp. 3d 100, 130 (D.D.C. 2025).

Dated this \_\_\_\_ day of \_\_\_\_\_, 2025      BY THE COURT:

\_\_\_\_\_  
United States District Judge



**ATTORNEYS AND PARTIES TO BE NOTIFIED**

***Pursuant to Local Rule 7(k)***

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