

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

D.C. PRESERVATION LEAGUE, et al.,

Plaintiffs,

v.

**BOARD OF TRUSTEES OF THE JOHN F.
KENNEDY CENTER FOR THE
PERFORMING ARTS, et al.,**

Defendants.

Civil Action No. 1:26-cv-00981

**DECLARATION OF ALISON K. HOAGLAND
IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION**

I, Alison K. Hoagland, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the foregoing is true and correct:

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, in which role I advised the National Trust on matters in relation to Washington, DC’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, DC, including the John F. Kennedy Center for the Performing Arts.

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 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 Kennedy Center 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 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, DC. 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 board of the National Council on Public History, the Michigan State Historic Preservation Review Board, the Committee of 100 on the Federal City, and 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, 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, a little more than three miles from the Kennedy Center. I first moved to DC in 1977 and stayed until 1994, then returned in 2009 and have been here ever since. I regularly attend events at the Kennedy Center, usually once or twice a year; most recently, I attended a performance of the American Ballet Theater there in February 2026. I also frequently drive past the Kennedy Center, usually two or three times a month, in my visits to friends, family, and doctors in Northwest, DC. Because the Kennedy Center cantilevers out over the Rock Creek and Potomac Parkway, I experience the dramatic effect of driving almost under the building.

10. The Kennedy Center serves as both a national cultural center and as a memorial to our slain president John F. Kennedy. Isolated on the landscape, the building's majesty is visible from several directions. Its considerable size, blinding white marble, and sharp angles produce a building that is both monumental and somber. Its elegance derives not from ornament—it is

virtually unadorned—but from its careful composition, symmetry and balance, and terraces and cantilevers stretching outwards. As an example of New Formalism, the building is modernist at its core, with the symmetry, rationalism, and clean lines of Classicism. It echoes the nearby Lincoln Memorial in its rectangular shape, colonnade, and memorial quality.

11. As an historian of Washington, DC, I frequently study major buildings as markers of public sentiment and political power. Neighborhoods' development and decline can be defined by what gets built there, and what does not. For instance, Foggy Bottom's shift from an industrial and working-class neighborhood into a site for urban renewal, paving the way for this grand edifice, sketches a story of urban development seen throughout the city. The obvious care and expense devoted to the design and construction of the Kennedy Center speak to the importance this building held in the minds of Eisenhower, Kennedy, and Johnson.

12. As a resident of Washington, DC, I intend to continue to attend performances at the Kennedy Center, when it reopens. I anticipate continuing my pattern of attending one or two performances a year, as I have seen the ballet in February 2026, the National Symphony in March 2025, a dance performance in April 2024, and musical theater in March 2024. Further, I intend to continue driving by it several times a month to visit family, friends, and doctors in Northwest, DC. The journey past the building is also a journey through it, as the parkway approaches the monumental edifice and then runs under and alongside it.

13. The changes that have already been made to the Kennedy Center have violated its original intention. The painting of the columns, originally a brass color, has changed the distinction that the old columns provided; although thin, they stood out from the building because of the contrasting color. Now painted white, they are less defined and less purposeful. Similarly, the renaming has clouded the purpose of the building, planned in part as a memorial to a dead

president, as the term “memorial” implies. Accordingly, my experience of the Kennedy Center as an aesthetic achievement and cultural monument has been impaired.

14. If the Kennedy Center is stripped down to its steel frame, as the President has suggested, and rebuilt without careful architectural review, the building would be permanently and irreparably harmed. The building is so simple in concept—a rectangular box—but so careful in design and execution, with thin columns, large marble slabs, expansive terraces, and sharp angles, that any change to the exterior runs the risk of violating some of the essential precepts on which this building is based.

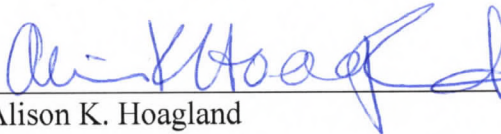
15. Accordingly, I would suffer both professional and personal injuries, including to my aesthetic, cultural, and historical interests, if the Kennedy Center were altered and rebuilt.

16. 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 written comments and provided public testimony at the National Capital Planning Commission meeting concerning the White House ballroom in early March. I would intend to participate in any public review processes and comment periods made available for any project of significant scale at the Kennedy Center, 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.

17. 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 potential for stripping the Kennedy Center down to its steel frame is real, and it has 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 people and their buildings.

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


Alison K. Hoagland

Executed on March 27, 2026