

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

DC 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 CARL E. LANDWEHR
IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION**

I, Carl E. Landwehr, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the following is true and correct and based on my personal knowledge:

1. My name is Carl E. Landwehr. I am over the age of eighteen and competent to make this declaration. I live half the year in Washington, D.C. and half the year in Michigan, and previously resided in McLean, Virginia between 1976 and 2015. I am a current member of the DC Preservation League (“DCPL”). I have been a member since 2026.

2. I have a longstanding personal connection to the John F. Kennedy Center for the Performing Arts (the “Kennedy Center”) in Washington, D.C. I own and occupy a co-op unit at 700 New Hampshire Ave NW, Washington D.C., across the street from the Kennedy Center. I have lived in the National Capitol area since 1976. I regularly visit the Kennedy Center to enjoy the surroundings for personal recreational enjoyment, to attend free Millennium Stage performances, to attend National Symphony Orchestra (“NSO”) performances as a seasonal subscriber, and to attend other performances as they are scheduled and tickets are available. I have attended performances and events at the Kennedy Center regularly for approximately fifty years.

Over the past ten years, I have visited the Kennedy Center approximately eight times per year to attend events like NSO performances, Washington National Opera performances, dance performances, and plays. I have also attended Millennium Stage performances about ten times per year. I have been a regular attendee at NSO concerts over the years. Since Maestro Noseda became Music Director in 2016, I have attended four to seven NSO concerts per year annually. I have likely attended in excess of 200 events at the Kennedy Center during my lifetime.

3. Given my residence adjacent to the Kennedy Center, I have regularly walked around the Kennedy Center grounds, including the terrace overlooking the Potomac River, for personal enjoyment, reflection, and exercise.

4. The Kennedy Center holds particular personal significance to me because attending events at the Kennedy Center has been a meaningful personal and family tradition for me for the last fifty years. My attachment to the building extends beyond the performances I attend. The physical environment of the Kennedy Center, including the Grand Foyer, theaters, terraces, exterior grounds, and the promenade along the Potomac, is part of what makes each visit significant to me. As an undergraduate, I listened to Professor Vincent Scully expound on Edward Durell Stone's design for the building and relate it to his design for the U.S. Embassy in India. I have since been privileged to visit performing arts centers in Melbourne, Sydney, and New York, and I have seen no facility that better unites venues for orchestras, opera, theater, and dance in a single building than the Kennedy Center. The high-ceilinged Grand Foyer with its crystal chandeliers that backs the three main halls and faces the Potomac is nothing less than awe-inspiring.

5. In our early years in the area, my wife and I often spent New Year's Eve waltzing on the red carpet in the Grand Foyer. Memorable performances include the world premiere of Menotti opera *Goya*, starring Placido Domingo, American composer Dominic Argento's *Aspern Papers*,

as well as many classics, including a chamber performance of *The Barber of Seville* in the Terrace Theatre.

6. I have concrete plans to continue visiting and using the Kennedy Center in the future. I am a current NSO subscriber, plan to subscribe to the NSO for the upcoming season, and plan to attend other performances as they are scheduled and tickets are available. I visit the Kennedy Center approximately twenty times per year and intend to continue visiting at that frequency. I regularly walk the grounds and the public terrace (though the Potomac promenade has been closed to walkers since mid-February), and I attend free performances at the Millennium Stage with friends and family. I have no plans to discontinue these visits.

7. I have already been personally and concretely harmed by alterations that the Defendants have completed at the Kennedy Center without following legally required review procedures.

8. In or around September 2025, the Kennedy Center's 200 exterior columns were repainted from their original gold color to white. These columns are an original and character-defining feature of the building's Modernist design, integral to the historic character that formed the basis for the D.C. State Historic Preservation Officer's 2012 determination that the Kennedy Center is eligible for the National Register of Historic Places. This change has diminished my aesthetic enjoyment of the building. In the fifty years I have visited the Kennedy Center, the exterior façade appearance including the gold columns were a defining visual element of my experience of approaching and entering the Kennedy Center, providing contrast to the white marble of the structure. The change altered the building's appearance in a way that I find diminishes its historic character and its visual relationship to its setting.

9. The Kennedy Center Defendants installed new exterior signage placing the name "Donald J. Trump" on the facade above the name of President Kennedy. This alteration to the facade

changed the character of the building as a memorial to President Kennedy, which is central to my personal experience of the site.

10. On December 18, 2025, the Board voted to rename the Kennedy Center to “The Donald J. Trump and The John F. Kennedy Memorial Center for the Performing Arts.” Placing the name of a sitting President on a memorial to an assassinated one is unheard of, unjustified, and offensive. It affects me each time I enter the building.

11. On March 16, 2026, the Board of Trustees and its Chair, Donald J. Trump, announced that in less than four months the Kennedy Center will close completely for several years. While closed, the Kennedy Center buildings and grounds will undergo major structural work, up to and including demolition and reconstruction (the “Project”). The Kennedy Center Defendants have stated that “preliminary work has been started” and that “significant construction work” is anticipated to begin after July 7, 2026.

12. These proposed alterations would personally and concretely harm me because my visits to the Kennedy Center performing arts venue are an important part of my regular social life and personal enjoyment. The announced multi-year closure of the Kennedy Center, beginning after July 7, 2026, would deprive me of access to a site that I visit regularly and that is central to my cultural life and personal and family traditions. The closure would prevent me from attending NSO concerts and other performances, would eliminate my access to the Kennedy Center’s public spaces including the terraces and grounds, and would disrupt a pattern of use I have maintained for fifty years. I have no adequate substitute for the experience of visiting the Kennedy Center.

13. Furthermore, the proposed alterations would fundamentally change the historic character of the Kennedy Center in ways that would diminish my aesthetic enjoyment of the site. Specifically, the proposed changes to the building’s exterior marble façade, interior spaces

including the Grand Foyer, concert hall, and opera house, and the grounds and terraces would alter the features that I have described above as central to my personal experience of the Kennedy Center. The Kennedy Center's Modernist design, its materials, its spatial qualities, and its setting along the Potomac are what make the building meaningful to me, and the proposed Project threatens to destroy or fundamentally alter those qualities.

14. I am further harmed by the Defendants' failure to follow legally required procedures before proceeding with the Project and the already-completed alterations.

15. The failure to initiate and complete Section 106 consultation under the National Historic Preservation Act has deprived me and other members of the public of the opportunity to have our interests considered before irreversible changes are made to this nationally significant historic property. Had Section 106 review been initiated, I would have had the opportunity, either directly or through the Organization, to present my concerns about the impact of the proposed alterations on my concrete interests in the Kennedy Center as described above.

16. The failure to prepare an environmental assessment or environmental impact statement under the National Environmental Policy Act means that the environmental consequences of these alterations, including impacts on the monumental core, the historic parkway, and the Potomac River waterfront, have not been adequately studied or disclosed. I would have reviewed and commented on any such analysis.

17. The failure to submit the Project to the National Capital Planning Commission ("NCPC") for review and approval, and the failure to request advice from the Commission of Fine Arts, has deprived me and other members of the public of the opportunity to participate in the public review processes that Congress established to ensure informed decision-making about development in the national capital. Given the extent to which this Project affects my enjoyment of the Kennedy

Center and my neighborhood, I would have submitted comments or testimony regarding the proposed Project.

18. To my knowledge, no public comment period or consultation opportunity has been provided in connection with the proposed Project or the already-completed alterations, despite the Kennedy Center's eligibility for the National Register of Historic Places. Had such an opportunity been provided, I would have participated and submitted comments describing the concerns set forth in this declaration.

19. The harm I have described is irreparable. Once the historic fabric of the Kennedy Center is altered or destroyed, it cannot be restored to its original condition. The Kennedy Center's architectural and historic character, which forms the basis of its eligibility for the National Register of Historic Places, would be permanently compromised. The opportunity for meaningful public consultation will be permanently lost if the alterations proceed before the legally required reviews are completed. Monetary damages cannot compensate for the loss of the aesthetic, cultural, and historic qualities I have described. These qualities, once destroyed, cannot be recreated.

20. The proposed alterations are already underway, as the Kennedy Center Defendants have stated that 'preliminary work has been started.' The 200 exterior columns have already been repainted, new signage has been installed, and the Kennedy Center Defendants have announced that the building will close after July 7, 2026 for multi-year construction.

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

Carl E. Landwehr

Carl E. Landwehr

03 / 27 / 2026

Executed on _____