

**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 YISELLE SANTOS RIVERA
IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION**

I, Yiselle Santos Rivera, 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 Yiselle Santos Rivera. I am over the age of eighteen and competent to make this declaration. I reside in Washington, DC.

2. I was born in Puerto Rico and moved to the mainland United States to attend Syracuse University, where I earned my Master of Architecture degree. I relocated to the Washington, DC metropolitan area and practiced as an architect at three major architecture firms between 2006 and 2024, focusing on projects local to the DC area, including the Constitution Center Office Building, a 1.4-million-square-foot Class A office building at 400 7th Street SW, Washington, DC, and the MedStar Georgetown University Hospital Surgical Pavilion, a 480,000-square-foot medical facility in Washington, DC. Since 2006, I have held an NCARB (National Council of Architectural Registration Boards) Certificate. I have also held a Maryland Registered Architect license since 2020.

3. I have been a member of The American Institute of Architects (“AIA”) since 2008 and currently serve as the AIA’s President-Elect. In that capacity, I work with AIA leadership to

advance the institute's strategic priorities and prepare to assume the presidency in 2027. I have also served as an associate representative on the AIA's Board of Directors and held multiple leadership roles within the AIA's Washington, DC chapter ("AIA|DC") between 2016 and 2023, culminating in my service as chapter President.

4. Aside from my work with the AIA, I am a Full-Time Lecturer at Howard University's School of Architecture, where I teach courses on integrated design and healthcare architecture. I also run my own architectural practice.

5. I am also a member of the National Organization of Minority Architects and Association of Collegiate Schools of Architecture (ACSA).

6. I have a longstanding personal connection to the John F. Kennedy Center for the Performing Arts (the "Kennedy Center") in Washington, DC. I first visited the Kennedy Center during a high-school trip to DC as part of the "Presidential Classroom" program, a formative experience of my teenage years. When I returned to the DC area as an adult, the Kennedy Center became a regular destination. The arts have been central to my life since childhood, and greater access to the arts was among the reasons I moved to the mainland United States.

7. Over the past two decades, I have attended various performances at the Kennedy Center—including multiple performances of the *Nutcracker* ballet; musical theater performances including *The Book of Mormon*, *Kinky Boots*, and *Aladdin*; several concerts; and the Washington National Opera. Whenever I visit the Kennedy Center for performances, I also visit the Center's public spaces to appreciate the architectural features of both the original building and the REACH Expansion, and to enjoy the Center's grounds and views overlooking the Potomac River.

8. As an architect, I find particular significance in Edward Durrell Stone's design of the Kennedy Center. I value the Center's mid-century Modernist elements, which embody a distinct

moment in the nation's architectural and cultural history. These include the building's iconic exterior colonnade of 200 gilded columns, which establish a civic rhythm that bridges mid-century Modernism with Washington's neoclassical monumental tradition. I value the cantilevered terrace overhanging the Potomac River, which creates a rare threshold between built civic space and natural landscape — an architectural gesture that makes the building feel both monumental and accessible. The arrival sequence — the processional approach from street level, ascending to the river terrace — is a carefully choreographed civic experience that shapes how visitors understand the building's purpose before they enter. The Grand Foyer, one of the longest interior rooms in the country, creates a democratic gathering space that precedes and contextualizes the performing arts venues it serves. I also value the building's visual relationship with the Georgetown neighborhood across the waterfront, which situates the Kennedy Center within the living city rather than apart from it. I also value the landscape architecture of the Center's grounds—the way the building interacts with the Potomac riverfront and creates a visual bridge between the monumental core and the Georgetown neighborhood.

9. I strongly associate the Kennedy Center with President Kennedy's legacy. Over the years, I have developed a deep appreciation for the Center's role as a living memorial to him and the values he represents.

10. I have concrete plans to continue visiting and using the Kennedy Center in the future. I visit the Kennedy Center for special occasions and performances and intend to continue visiting for those occasions. I have tickets for the musical *Chicago* at the Kennedy Center on March 29, 2026. I also plan to continue attending the *Nutcracker* at the Kennedy Center around Christmas.

11. I have already been concretely harmed by alterations that the Defendants completed at the Kennedy Center without following legally required review procedures. The repainting of the

Kennedy Center’s 200 exterior columns from gold to white has significantly diminished the Center’s historic character and my aesthetic enjoyment of the building. The installation of new exterior signage on the façade—placing the name “Donald J. Trump” above that of John F. Kennedy—has likewise diminished the building’s character as a living memorial to President Kennedy, which is central to my experience of and appreciation for the site.

12. On February 1, 2026, Donald J. Trump, Chair of the Kennedy Center’s Board of Trustees, announced on social media plans to shut down the Center for two years for a project involving “Construction, Revitalization, and Complete Rebuilding” and replacing the Center with something “new.” As both a patron and an architect this announcement horrified me, given my strong connection to the existing building and its Modernist design.

13. On March 16, 2026, the Board of Trustees and Mr. Trump announced that the Kennedy Center will close completely for two years beginning in less than four months. 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. These proposed alterations would concretely harm me by fundamentally changing the Kennedy Center’s historic character and diminishing my aesthetic enjoyment of the site. Specifically, the proposed changes to the building’s exterior marble façade; the interior spaces including the Grand Foyer, concert hall, and opera house; the grounds and terraces; and the REACH Expansion would alter the features I described above as central to my personal experience of the Kennedy Center. The Kennedy Center’s design, its materials, its spatial qualities, and its setting along the Potomac are not only defining of the Modernist movement; they are what make

the Center meaningful to me, and the proposed Project threatens to destroy or fundamentally alter those qualities.

14. The announced multi-year closure would also deprive me of access to a site I visit regularly and that is central to my personal, cultural, and family life. The closure would prevent me from attending the *Nutcracker* around Christmas as I have in the past, would eliminate my access to the Kennedy Center's public spaces, and would disrupt a pattern of use I have maintained for two decades. I have no adequate substitute for the experience of visiting the Kennedy Center.

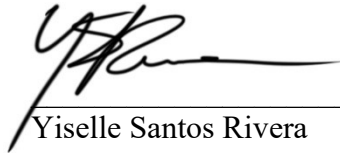
15. I am further harmed by the Defendants' failure to follow legally required procedures before proceeding with the Project and the already-completed alterations. As an architect, I believe historic preservation and environmental review processes are essential to community participation in decisions affecting the built environment, and the failure to follow those processes here is therefore particularly harmful to me. Specifically, the Defendants have failed to initiate Section 106 consultation under the National Historic Preservation Act; to submit the Project to the National Capital Planning Commission for review and approval and to the Commission of Fine Arts for advice; and to prepare an environmental assessment or environmental impact statement under the National Environmental Policy Act. Each of these failures has deprived me and other AIA members of the opportunity to have our interests considered before irreversible changes are made to this nationally significant historic property.

16. To my knowledge, no public comment period or consultation opportunity has been provided in connection with the proposed Project or the already-completed alterations. Had such an opportunity been provided, I would have participated in each of these review processes, either directly or through the AIA. I would have presented my concerns about the impact of the proposed alterations on my concrete interests in the Kennedy Center, submitted comments or testimony on

the Project's effects on development in the national capital, and reviewed and commented on any environmental analysis—including an assessment of the Project's impacts on the monumental core, the historic parkway, and the Potomac River waterfront.

17. The harm I have described is irreparable. The Kennedy Center's historic fabric—its physical materials, design elements, and craftsmanship—is irreplaceable. Once altered or demolished, these features cannot be restored, and the architectural significance and historic integrity supporting the Kennedy Center's eligibility for listing on the National Register of Historic Places would be permanently diminished. Completing the proposed alterations before the legally mandated review processes are finished would foreclose any genuine opportunity for public consultation on the project's impact. No monetary award can adequately substitute for the aesthetic, cultural, and historic qualities at stake, as these qualities derive from a singular moment in the nation's architectural and cultural history. The loss of these irreplaceable qualities—particularly without the legally mandated review processes—would be personally devastating. And, because preliminary work has already begun and significant construction is planned to commence within a matter of months, the threatened harm to my interests is imminent.

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



Yiselle Santos Rivera

Executed on March 27, 2026.