

**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 PATRICIA ANN WADDY
IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION**

I, Patricia Ann Waddy, 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 Patricia Ann Waddy. I am over the age of eighteen and competent to make this declaration. I reside in Washington, D.C.
2. I am a current member of the Society of Architectural Historians (“SAH”). I am currently a Life Member and have been a member since 1965. I am a past president (1996–1998) and past editor of the Journal of the Society of Architectural Historians (1990–1993).
3. SAH is a not-for-profit corporation organized under the laws of the Illinois General Not-for-Profit Corporation Act of 1986 with its principal office in Chicago, Illinois. It was founded in 1940 and is exempt from federal income tax under Section 501(c)(3) of the Internal Revenue Code.
4. SAH’s stated mission is to promote the study, interpretation, and conservation of the built environment worldwide for the benefit of all. SAH serves a network of local, national, and international institutions and individuals who, by vocation or avocation, focus on the teaching, practice and history of architecture, design, landscapes, and urbanism.

5. In furtherance of this mission, SAH's core programmatic activities include incubating and supporting scholarship, research, and education about the history of the built environment; organizing and presenting professional conferences, educational programs, and publications related to architectural history, architecture, landscape architecture, historic preservation, and the built environment; advancing the professional standards and public understanding of architectural history; supporting the professional development of historians, practitioners and all who work with the history of the built environment; organizing field trips to buildings, landscapes, and sites worldwide; acknowledging outstanding scholarly and conservation accomplishments; and advocating for the preservation of nationally significant buildings, sites, and landscapes, including through participation in federal review processes.

6. SAH has a longstanding and direct institutional connection to the John F. Kennedy Center for the Performing Arts (the "Kennedy Center") in Washington, D.C. SAH's members include architects, historians, landscape architects, preservationists, and other professionals who use and study the Kennedy Center as part of their professional work.

7. SAH's members include architects, historians, landscape architects, preservationists, other professionals and non-professionals who attend performances and events at the Kennedy Center.

8. Furthermore, SAH regularly issues statements advocating for and in support of actions that protect cultural sites and historic properties. SAH's engagement with actions that affect the Kennedy Center is a core part of its institutional mission.

9. I, personally, also have a longstanding personal connection to the Kennedy Center in Washington, D.C. I have attended performances and events at the Kennedy Center regularly for approximately 15 years since moving to Washington in spring 2008. I am a subscriber to both the National Symphony Orchestra and the Fortas Chamber Music, and I have included the National

Symphony in my will. Over the past three years, I have visited the Kennedy Center approximately 14 times per year to attend performances by the National Symphony Orchestra, the Kennedy Center Chamber Players, the Fortas program, and Washington National Opera. I also visit the Kennedy Center's public spaces, including the Grand Foyer, the terrace overlooking the Potomac River, the Hall of States, the Hall of Nations, and the rooftop terrace, for personal enjoyment and reflection. I also host guests to the District who join me for performances, and I point out features of the design.

10. The Kennedy Center holds deep cultural significance to me and my community. I view the Kennedy Center not only as a performance venue but as a public landmark that belongs to and serves the people of this region and the nation.

11. The Kennedy Center holds particular personal significance to me because, as an architectural historian, I am aware of its architect and architecture in the history of twentieth-century American architecture.

12. The building's mid-century Modernist architecture, designed by Edward Durell Stone and completed in 1971, is integral to my experience of the site. I value the building's distinctive white marble facade, its 200 exterior columns (originally finished in gold), the sweeping proportions of the Grand Foyer, the iconic crystal chandeliers, the "box within a box" acoustical design by Cyril M. Harris, and the relationship between the building and its setting along the Potomac River. These design features are central to why I visit the Kennedy Center and are part of what makes the experience meaningful to me.

13. The Kennedy Center is a living memorial to President John F. Kennedy, established by Congress as the sole national memorial to the late President in the city of Washington. I am old enough to remember, personally, the election, presidency, and assassination of John F. Kennedy.

I am aware that the D.C. State Historic Preservation Officer determined in 2012 that the Kennedy Center is eligible for the National Register of Historic Places. The building's historic character, including its original design, materials, and setting within the monumental core, is inseparable from the experience of visiting the site. Alterations that compromise the building's historic integrity would diminish the very qualities that make the Kennedy Center significant to me.

14. I have concrete plans to continue visiting and using the Kennedy Center in the future. As a subscriber for the 2025–2026 season, I hold tickets for the National Symphony Orchestra's ("NSO") concerts on April 9 (rehearsal), April 17, and May 1, 2026, the Fortas Chamber Music on April 8, and the Kennedy Center Chamber Players on May 31, 2026, and I look forward to renewing my subscriptions when materials are available. Just recently, I attended the excellent Fortas presentation of the Viano Quartet, and I especially look forward to the NSO's presentation of a concert version of *Il Trittico* (part of Gianandrea Noseda's commendable program of presenting concert operas) on May 1. I have attended the NSO and Fortas programs at the Kennedy Center for about fourteen consecutive years, and occasional performances of the Washington National Opera, and I intend to continue doing so.

15. 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.

16. In or around September 2025, the Kennedy Center's 200 exterior columns were painted 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. The gold columns were a defining visual element of my experience of

approaching and entering the Kennedy Center. The change altered the building's appearance in a way that I find diminishes its historic character and its visual relationship to its setting. The white columns seem to "disappear" against the white of the marble walls behind them.

17. 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.

18. 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." John F. Kennedy had a personal relationship to the performing arts, making the dedication of the building an appropriate memorial to him, and Donald J. Trump does not.

19. 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. This announcement was made without revealing the name of the new architect or the design.

20. These proposed alterations would personally and concretely harm me because 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, the 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.

21. Additionally, 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 (an important reason for my relocation to Washington, D.C. when I retired). The closure would prevent me from attending musical events, would eliminate my access to the Kennedy Center's public spaces including the Grand Foyer, the terraces, the grounds, and the Millennium Stage, and would disrupt a pattern of use I have maintained for about 15 years. I have no adequate substitute for the experience of visiting the Kennedy Center.

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

23. 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.

24. 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.

25. The failure to submit the Project to the National Capital Planning Commission 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. I regularly follow NCPC and CFA proceedings as reported in local media, and I would have submitted comments or testimony regarding the proposed Project.

26. 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.

27. 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.

28. 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. The white paint makes the columns "disappear" against the white marble walls behind them. The new signage has been installed (and could still be removed, with just the scars to be remediated). The Kennedy Center Defendants have announced that the building will close after

July 7, 2026, for multi-year construction. I have personally observed these changes on visits to the Kennedy Center.

29. The Kennedy Center Defendants have publicly announced that the building will close after July 7, 2026 and that “significant construction work” will begin at that time. The announced closure is less than four months away. The planning for the 2026–2027 seasons of the NSO and the Fortas Chamber Music series is in abeyance.

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

Patricia Waddy

Patricia Ann Waddy

Executed on 03 / 27 / 2026