

**IN THE 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.

Case No. 1:25-cv-04316-RJL

**DECLARATION OF JESSICA BOWRON, COMPTROLLER OF
THE NATIONAL PARK SERVICE EXERCISING THE DELEGATED
AUTHORITY OF THE DIRECTOR OF THE NATIONAL PARK SERVICE**

I, Jessica Bowron declare as follows:

1. I am the Comptroller for the National Park Service (“NPS”) and am exercising the delegated authority of the Director of the NPS pursuant to a January 20, 2025 delegation of that authority from the Acting Secretary of the Interior, and subsequent extension of that authority by the Secretary of the Interior. I have been employed by NPS since 2007 and served as NPS comptroller since 2017.
2. I have personal knowledge of all facts stated in this declaration, and if called to testify, I could and would testify competently thereto.
3. In my current position as Comptroller, Exercising the Delegated Authority of the Director of the NPS, I oversee the management and operation of all units within the National Park System nationwide, as well as all NPS programs, NPS directorates, and regional offices. The White House and President’s Park (“the Park”) is an administrative unit within the National Park System in the NPS National Capital Region (“NCR”) comprised of the

White House, Lafayette Park, Sherman Park, the First Division Monument, and the Ellipse.

4. NPS's mission is to preserve unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations.
5. Under the NPS Organic Act of 1916, the NPS was authorized to "promote and regulate the use of the National Park System by means and measures that conform to the fundamental purpose of the System units, which purpose is to conserve the scenery, natural and historic objects, and wild life in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wild life in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." 54 U.S.C. § 100101. This authority generally extends to historic preservation and construction activities at individual park units in furtherance of the purpose of the park unit at issue.
6. The NPS Organic Act also supplies NPS with the authority to accept donations, including "patented land, rights-of-way over patented land or other land, buildings, or other property within a [National Park] System unit" and "money that may be donated for the purposes of the System." 54 USC § 101101.
7. In 1961, Congress enacted the Park's enabling legislation and directed that the President's Park enclosure, which includes the White House, its wings, the grounds within the White House fence and facilities located on those grounds, be administered pursuant to the NPS Organic Act. Pub. L. No. 87-286 (1961). Congress directed that in carrying out NPS's responsibilities under its Organic Act, "primary attention shall be

given to the reservation and interpretation of the museum character of the principal corridor on the ground floor and principal public rooms on the first floor of the White House.” *Id.* However, Congress further directed that “nothing done under [the Park’s enabling legislation] shall conflict with the administration of the Executive offices of the President or with the use and occupancy of the buildings and grounds as the home of the President and his family and for his official purposes.” *Id.*

8. In my current position, I have been and continue to be regularly briefed by John Stanwich, the NPS Liaison to the White House, and members of the Park’s staff regarding the East Wing Modernization and State Ballroom project (“the Project”), the purpose of which is to establish a permanent, secure event space within the White House grounds that meets presidential priorities for capacity and dignified official functions and eliminates reliance on temporary tents and associated infrastructure strains.
9. On August 28, 2025, and pursuant to the requirements of the National Environmental Policy Act (“NEPA”), I signed and approved a Finding of No Significant Impact (“FONSI”) for the White House East Wing Modernization and State Ballroom Environmental Assessment. The FONSI determined that that the selected action, establishing a permanent, secure event space within the White House grounds by replacing the then-existing East Wing of the White House with a new building that will house the White House State Ballroom, will not cause significant adverse effects requiring the preparation of an environmental impact statement. A Non-Impairment Determination prepared in compliance with NPS’s 2006 Management Policies and the NPS Organic Act was attached as Appendix A. The FONSI, together with Appendix A, are attached to this declaration as Exhibit A and available online on the NPS’s Planning,

Environment & Public Comment (PEPC) website at: [ParkPlanning - White House East Wing Modernization and State Ballroom Environmental Assessment](#).

10. The conclusions in the FONSI were based on the analysis in an August 2025 Environmental Assessment (“EA”) prepared by NPS for the Project. A copy of the August 2025 EA is attached to this declaration as Exhibit B and available online on the PEPC page for the Project.
11. NPS also documented compliance with Section 106 of the National Historic Preservation Act (“NHPA”) for the limited activities associated with the East Wing Modernization Project that would take place outside of the White House and its Grounds. The White House and its grounds are exempted from the NHPA. 54 U.S.C. § 307104. A Memorandum to File documenting, pursuant to 36 CFR 800.3(a)(1), a finding of no potential for those activities to cause effects on historic properties is attached to this declaration as Exhibit C and available online on the PEPC page for the Project.
12. NPS also documented compliance with Section 7 of the Endangered Species Act. A Memorandum to File finding that the East Wing Modernization Project had no effect on federally listed species or their habitats is attached to this declaration as Exhibit D, and available online on the PEPC page for the Project.
13. The Executive Residence at the White House is handling project management for the Project, which means that that it is in control of all aspects of the day-to-day execution of the Project, including its scope, schedule, budget, design, and completion. However, the Executive Residence is coordinating with NPS staff regarding the Project, in particular with respect to potential impacts on NPS operations at the White House.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 15, 2025.

**JESSICA
BOWRON**

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JESSICA BOWRON
Date: 2025.12.15
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Jessica Bowron