

**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 JOHN STANWICH, NATIONAL  
PARK SERVICE LIAISON TO THE WHITE HOUSE**

I, John Stanwich declare as follows:

1. I am the National Park Service (“NPS”) Liaison to the White House. I have been in this position for approximately 11 years. Prior to that time, I served as the Deputy NPS Liaison to the White House for approximately 5 years. I have been employed by NPS since 1992. In my current position, I report to the Deputy Regional Director of the NPS National Capital Region (“NCR”).
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. As NPS Liaison to the White House, I supervise approximately 60 employees and oversee NPS daily operations at the White House and President’s Park (“the Park”) as well as at the White House Visitor Center and the Executive Support Facility. I function as and have the line authority of a park superintendent, but, due to the unique nature of the Park, I also have additional responsibilities of coordinating with other executive branch entities that have responsibilities in and around the Park. My role also includes

planning for and executing major national events such as Presidential Inaugurations, the National Christmas Tree Lighting, and the White House Easter Egg Roll.

4. The Park is an administrative unit within the National Park System comprised of the White House, Lafayette Park, Sherman Park, the First Division Monument, and the Ellipse. The Park is unique within the National Park System in that it serves as a private residence, the seat of the executive branch of the U.S. government, a military installation, a museum, and a public park.
5. In my role as NPS Liaison at the White House I regularly meet and coordinate with representatives of several federal entities with responsibilities in and around the Park including: the Office of Administration, Executive Office of the President; the Executive Residence at the White House (“Executive Residence”); the White House Curator’s Office; the National Capital Region of the U.S. General Services Administration; the U.S. Secret Service; and the White House Military Office. I also perform on-site oversight of NPS activities in and around the Park and am present on site on a daily or near daily basis.
6. As the home of presidents, the White House must serve the needs of the presidential family, just as any American home serves its occupants. Additionally, the White House must serve the president as the location for official and ceremonial functions. In my role as NPS Liaison to the White House, I coordinate closely with the Executive Residence at the White House, within the Executive Office of the President to provide NPS support for day-to-day official activities at the White House, to ensure that NPS’s maintenance and preservation activities on site do not interfere with planned official functions, and to support the White House tour program. The Executive Residence at the White House

provides for the use of the White House and its grounds as the official home of the President and his family, supports the official ceremonial functions of the President, and works with the NPS and other entities to promote the preservation and public appreciation of the White House and its contents.

7. The White House currently lacks a secure event space to host large events, such as State Dinners. To accommodate such events, large tents are typically erected on the South Lawn of the White House. In the past, these tents have caused substantial damage to NPS resources on the grounds, particularly the turf, which then must be repaired or remediated by NPS. The use of stakes to secure these tents also risks damaging irrigation systems and other NPS infrastructure elements on the ground.
8. The Executive Residence is managing the White House East Wing Modernization and State Ballroom Project (“the Project”), which requires extensive coordination with not only NPS, but also with other government entities with management responsibilities in and around the Park. Members of my staff and I have been closely coordinating with staff at the Executive Residence and supporting the Project since early spring 2025. I have personally attended, and continue to attend, coordination and planning meetings, and I personally observe activity on site in the performance of my official duties. I, or members of my staff, also attend weekly meetings with the general contractor engaged by the Executive Residence at the White House for the Project, Clark Construction, that provide regular updates on the Project’s status, identify potential issues that arise in connection with the Project, and resolve those issues. Since the selection of Shalom Baranes Associates as the Project architect, representatives of Shalom Baranes Associates have also attended these meetings.

9. On August 18, 2025, I signed a Categorical Exclusion Documentation Form to document compliance with the National Environmental Policy Act (“NEPA”) for NPS activities on site in anticipation of the commencement of construction activities, including removal of museum objects from the White House and East Wing, limited relocation of trees and shrubs, and survey and historic documentation actions at the White House. A copy of this Form is 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 Park’s enabling legislation, Public Law 87-286, expressly addresses the management of artifacts and stipulates that furniture, fixtures, and decorative objects declared by the President to be of historic or artistic interest shall be considered inalienable and property of the White House. Pub. L. No. 87-286 (1961). Items not currently in use or on display are curated or stored at the NPS’s Executive Support Facility and may be returned to the White House when required. NPS routinely transfers museum objects and other materials from the Executive Support Facility to the White House for use or display there and removes such objects from the White House for storage or curation at the Executive Support Facility.
11. The Executive Support Facility is an off-site facility that houses utilitarian property for use at the White House, as well as parts of the White House historical collection not in use and other artifacts.
12. In late August 2025 through September 2025, I and members of my staff coordinated closely with the White House Curator’s Office to identify and remove museum objects, including paintings and historic furniture, from the East Wing, East Colonnade, and the

Ground Floor State Rooms of the White House to be stored or curated at the Executive Support Facility.

13. NPS's Heritage Documentation Programs completed Historic American Building Survey ("HABS") documentation of the East and East Colonnade in late August 2025, including 3D/LIDAR scanning and photo documentation. NPS's Heritage Documentation Programs, including HABS, document historic sites and structures across the United States through the creation of measured drawings, large-format photographs, and historical reports. NPS's Heritage Documentation Programs are prepared to provide ongoing photographic documentation during the construction process to document the Project for posterity.
14. The Executive Residence and the office of the White House Curator also performed similar documentation including photography and 3D scanning to create a digital twin of the East Wing and East Colonnade spaces for future preservation and interpretive purposes.
15. During summer 2025, my staff and I worked closely with Clark Construction to identify and plan to preserve historic building elements. Beginning in late-August 2025 through early-October 2025, Clark Construction performed historic preservation work salvaging historic materials within the East Wing and East Colonnade. Clark Construction removed and is storing the stone columns, doors, and other items that are planned to be reincorporated into the new facility. In addition to museum objects, NPS is also storing historic items removed from the East Wing and East Colonnade by Clark Construction, including the East Wing cornerstone and plaque, historic fencing, historic windows, light fixtures, and the IM Pei-designed pergola from the East Garden.

16. I have been informed that abatement activities related to certain hazardous materials within the Project area were performed by Clark Construction during the months of September and October 2025. After Clark Construction completed the planned historic preservation work and abatement activities, structural demolition of the East Wing and East Colonnade commenced on October 20, 2025.
17. On November 6, 2025, members of NPS Cultural Resources Planning and Science directorate visited the East Colonnade to consult with Clark Construction and review plans regarding the removal of the portion of the East Colonnade immediately abutting the Executive Mansion. Substantial care and consideration was given to ensure that the removal of this last portion of the East Colonnade did not harm the Executive Mansion and that the vibrations from construction activity were monitored so that the deconstruction effort did not impact the artifacts and objects inside the Executive Mansion. Removal of this portion of the East Colonnade was completed on November 21, 2025.
18. The White House tour program, which NPS supports in furtherance of its mission for the Park, was suspended on August 30, 2025 to accommodate on-site Project activities. The tour program resumed on December 2, 2025. Prior to the resumption of tour activities, a need was identified to install a temporary modular pavilion and walkway on the North Grounds of the White House to provide an entryway for guests and to house restroom and coat check facilities that will likely otherwise be unavailable until the Project is complete. On November 20, 2025, I signed a Categorical Exclusion Documentation Form to document compliance with NEPA for the installation of this temporary tour facility, a

copy of which is attached to this Declaration as Exhibit B, and available online on the Project's PEPC page.

19. As of December 5, 2025 above grade structural demolition of the East Wing and East Colonnade has been completed by Clark Construction. Below grade structural demolition has begun and is expected to be completed during December 2025. Below grade excavation activities throughout the site continue.
20. At present, I anticipate that Clark Construction will commence work on the footings and below-grade structural concrete in the East Colonnade area in January and in the East Wing area in February. Above grade structural work is not anticipated to begin until April 2026, at the earliest.
21. The architectural design for the above grade elements is still in progress but has been coordinated in a manner to allow the below grade elements to be constructed as planned while the above grade design is finalized.
22. I am coordinating with the Executive Residence and staff at the NPS National Capital Region on submitting materials regarding the Project to the National Capital Planning Commission. I understand that the Executive Office of the President intends to engage with the U.S. Commission on Fine Arts at its discretion when the Commission has a quorum and that plans are underway to appoint new members to the U.S. Commission on Fine Arts. The NPS will provide whatever support is needed to advance these efforts.
23. Due to the impacts of the Project, spaces that were previously included in tours of the White house are occupied by staff as office spaces, including the Vermeil Room, the China Room and the Library, and thus no longer included in tours. Until the Project is complete, Park visitors will not have the opportunity to enjoy and benefit from seeing

historic items in their historic context, such as the White House China Collection in the China Room. Additionally, the East Colonnade, which will be reconstructed as part of the Project, provided opportunities for Park visitors to view the South Lawn and its gardens. If progress on the Project were halted, this would prolong these impacts to the experiences of Park visitors.

24. I have also been informed that the below-grade waterproofing and structural concrete work that will be occurring over the next four months is critical to bringing the temporary construction state of the site into a more permanent condition, particularly in areas where the existing-to-remain elements have been temporarily exposed.

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

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John Stanwich