

**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

**SUPPLEMENTAL 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 extensions of that authority by the Secretary of the Interior. I have been employed by NPS since 2007 and have 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, 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 authorizes NPS 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 U.S.C. § 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, "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 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. The Project is intended to meet the functional goals and operational needs of the Executive Office of the President (“EOP”). NPS determined that the Project was consistent with the Park’s enabling legislation. Pub. L. 87-286. The Project will directly benefit the American people in a number of ways, including by: (1) expanding the White House’s ability to host large indoor events; (2) reducing reliance on large tents that damage turf and infrastructure and necessitate costly repairs; (3) celebrating America’s history through new interpretive opportunities; (4) maintaining public access to key interpretive areas and ensuring preservation of the museum character of the principal ground floor corridor and State Floor public rooms of the White House; and (5) creating a symbolic space for events of national importance, reinforcing shared civic identity and pride.

10. The Executive Residence at the White House (“EXR”) has unique expertise in fulfilling the operational needs of the President and providing for the use of the White House for official ceremonial purposes as well as the President’s home. EXR is also best positioned to coordinate with all agencies that have equities in the White House that may be affected by the Project. Accordingly, NPS determined that it was in the best interests of the United States for EXR to contract for and directly manage the Project.
11. EXR is therefore handling project management for the Project, meaning 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, EXR is coordinating with NPS staff regarding the Project, in particular with respect to potential impacts on NPS operations at the White House.
12. Pursuant to NPS’s donation acceptance authority, 54 U.S.C. § 101101, on November 13, 2025, the agency accepted a private donation for the Project.
13. Pursuant to the Economy Act, 31 U.S.C. § 1535, and for the reasons articulated in Paragraphs 9 and 10 above, on November 17, 2025, NPS entered into a reimbursable agreement with EXR under which the donated funds were transferred to EXR to fund the Project.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 15, 2026.

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Jessica Bowron