

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

**NATIONAL TRUST FOR HISTORIC
PRESERVATION IN THE UNITED
STATES,**

Plaintiff,

v.

Civil Action No. 25-4316

NATIONAL PARK SERVICE, et al.

Defendants.

DECLARATION OF WILLIAM J. BATES

I, William J. Bates, declare as follows:

1. The facts set forth in this declaration are based upon my personal and professional knowledge, and if called as a witness in this proceeding, I could and would testify competently thereto under oath. As to those matters that reflect an opinion, they reflect my personal and professional opinion on the matter.

2. My name is William J. Bates. I have been a registered architect in the Commonwealth of Pennsylvania since 1978. I have worked in the private sector for almost fifty years and have many years of experience working with government agencies and managing government construction projects. I served as the National President of the American Institute of Architects (AIA) in 2019. I am Adjunct Professor of Architecture at Carnegie Mellon University in Pittsburgh. For more details about my professional background, I have attached my resume as Exhibit A to this Declaration.

3. I submit this Declaration in connection with the case of *National Trust for Historic Preservation in the United States v. National Park Service*. I am aware of the administration's plans to build a new ballroom in the vicinity of the White House. I understand that the administration has begun construction work in the vicinity of the White House, but has not finalized or publicized plans for the ballroom.

4. The purpose of this Declaration is to share my expertise as to the need for—and the standard practice of preparing—plans for the design of a building before construction of the building's foundation commences.

5. In my professional experience—which includes the design and construction oversight of civic buildings as well as privately owned projects—planning and design activities for the construction of buildings always precede the commencement of below-grade construction of a foundation. This is so because the below-grade foundation system establishes the structural grid, load paths, and lateral-force resisting systems that dictate the size, spacing and location of columns, shear walls, structural cores, and load-bearing elements above-grade. With respect to the proposed White House ballroom, once the foundation and related subsurface work are in place, the location, bulk, spans, bay sizes, and floor plate geometry (among other elements) of the building itself are fixed for all practical purposes. Altering these conditions after the fact would require major demolition and redesign.

6. The design of a foundation depends upon many factors—including soil bearing capacity, groundwater, settlement characteristics and seismic site classifications. Foundation type and capacity determine the maximum permissible loads and column

locations. These constraints in turn govern the allowable massing, height, occupancy loads and program details referenced above. With respect to the proposed White House ballroom, to proceed with the construction of the foundation without having designed or obtained approvals for the entirety of the project—both below ground and above ground—risks constructing a foundation that is inadequate for the project that is ultimately approved. Avoiding the risk of under-building in turn runs the risk of over-building a foundation that then requires down-sizing or revising the plan of the building. Down-sizing is often expensive and difficult, and all else equal, an overbuilt foundation makes changing plans to a smaller building significantly more difficult.

7. The layout of the foundation also fixes life safety elements of the project such as stair and elevator cores, fire-rated shafts and points of access and exit. This is so because these elements must be anchored on and coordinated with foundation walls and pits. Travel distances for egress, exit separations, areas of refuge, and fire compartmentation are set by the subsurface work. For the White House ballroom, any changes to exit routes, occupant load or emergency access points would be difficult to accommodate after the foundation is built because core access points and exit placements would already be fixed.

8. It is standard architectural practice that subsurface utilities and infrastructure—stormwater detention or treatment, sanitary and water services, fire service mains, electric duct banks, fuel or water tanks, geothermal wells and foundation drainage—be approved and coordinated prior to excavation. Post-foundation changes to the building may require

relocating these elements, which is not feasible once slab, pile caps and foundation walls are constructed.

9. The foundation establishes the building's structural and support points which govern the building's façade, window spacing, support of cantilevers, and the anchoring of balconies, canopies, or other projections. With respect to the proposed White House ballroom, review, consultation, and approval of the design may require changes to articulation, fenestration or projection limits in order to respect the setting of the Residence itself. With foundation and embed locations already fixed, adjustments to façade pattern, overhangs or projections—required to protect the setting of the White House itself—may not be achievable without extensive changes in the already-embedded foundation.

10. Numerous environmental requirements—stormwater management, tree protection, soils management and utility connections—affect where and how subsurface elements like foundations can be located. In a landscape that is historically significant—such as that of the President's Park—foundation and vault locations may need to be shifted to protect trees, existing historic resources such as the Executive Mansion itself, or accommodate other environmental constraints. Building the foundation prior to approval of the final design can lock the project into noncompliant configurations and restrict above-grade loading and layout options.

11. It is standard professional practice for the architect's and engineer's calculations for foundations to be predicated on defined design criteria, such as use, occupancy, structural loads and building geometry. Architects and engineers design buildings first—

according to these criteria—and, after completing the design, then plan for a foundation that supports that design. For the proposed White House ballroom, building the foundation before the design criteria have been reviewed and approved risks a mismatch between the already-built subsurface structure and the to-be-reviewed-and-approved superstructure. Finalizing and constructing a foundation before completing the building design inevitably will constrain if not eliminate the flexibility to modify elements of the building design such as program, massing, size, location, and layout.

12. The location of a building's fire protection and related utilities requires an early decision that must be coordinated with the construction of foundation walls and penetrations. Fire service mains, backflow prevention systems, pump rooms, standpipe riser locations, and fire command center access are all considerations that impose requirements on the foundation. Building a foundation must take those requirements into account, but doing so before the building itself is designed may result in a foundation that is inconsistent with the building's ultimate design. Accommodating such design changes would require extensive re-working if not complete replacement of the foundation.

13. Foundation and related subsurface work is not generic, and it is not easily modified. Such work is project-specific, and it determines what can be built above the surface. For the proposed White House ballroom to commence foundation work before review and consultation, and before obtaining required approvals, will predetermine key aspects of scale, size, location and shape of the above-grade structure. Commencing foundation work before submitting plans for review, commentary and approval will likely cause any such review, commentary or approval to be an empty exercise and preclude

meaningful approvals. For a meaningful review and approval process to occur after foundation construction has already commenced might well require major demolition and redesign.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.



William J. Bates

Executed this 26th day of December, 2025.

Exhibit A

WILLIAM J. BATES, FAIA, NOMA
57 Marlin Drive West, Pittsburgh, PA 15216
Mobile Phone: 412 / 292-1258
Email: wbates.faia@gmail.com

SUMMARY

Corporate Architect and Real Estate Executive experienced in international development. Innovative strategist with proven ability to manage large construction projects, lease administration, and building services. Developed strong interdisciplinary teams by supplementing corporate resources with external specialists. Demonstrated competence in both "Start-ups" and Fortune 100 organizations.

PROFESSIONAL EXPERIENCE

CARNEGIE MELLON UNIVERSITY, Pittsburgh, PA 2014-2018, 2020-present
Adjunct Professor, School of Architecture

- Teaching in the Masters program of Architecture, Engineering & Construction Management

EAT'N PARK HOSPITALITY GROUP, INC., Pittsburgh, PA 2002-2018
Sr. Vice President, Real Estate

- Management of an 80-site corporate property portfolio throughout the PA, OH, WV.
- Responsible for restaurant division growth through new site identification and acquisition
- Implemented use of corporate site selection software and analysis standards.

MARCONI, INC., (formerly FORE Systems, Inc.) Warrendale, PA 1995-2002
Vice President, Real Estate and Building Services

- Managed the corporate property portfolio expansion from 28 to 150 global sites in 5 years.
- Administered construction and maintenance of \$300MM in global corporate development.
- Performed property due diligence assessments related to merger and acquisition initiatives.
- Acquired and managed a \$33MM corporate aircraft used for international executive shuttle.
- Managed the design & construction of 1.4 MSF of office, laboratory, and manufacturing space globally.

PNC BANK, N.A., Pittsburgh, PA 1993-1995
Vice President, Strategic Facilities Planning

- Analyzed and benchmarked corporation's 11 MSF space performance and utilization.
- Developed occupancy strategies for all corporate headquarters functions.
- Strategic planning and site evaluation for new 300,000 SF operations center.

WESTINGHOUSE ELECTRIC CORP., Pittsburgh, PA 1984-1993
Manager of Design, Headquarters Corporate Services, Construction Department

- Managed architectural & engineering consultant selection and design process.
- Developed and administered the corporate facilities standards.
- Managed technically diverse corporate construction projects across North America.
- Designed & managed all headquarters projects for 500 KSF Westinghouse Building
- Managed the design of numerous DoD and NRC projects with US security clearances.
- Managed the design and construction of TV and radio Broadcasting projects in 10 states

CELENTO & EDSON ARCHITECTS & PLANNERS, Pittsburgh, PA 1974-1984
Architectural Intern, Designer, Partner

- Managed architectural design of K - 12 building projects for numerous school districts
- Designed the African American Heritage Classroom for the University of Pittsburgh

EDUCATION

Bachelor of Architecture – University of Notre Dame, Notre Dame, IN

Honorary Doctorate — Boston Architectural College, Boston, MA

PROFESSIONAL DEVELOPMENT

Construction Management, Graduate Program – Pennsylvania State University

Construction Management – Harvard University, Graduate School of Design

Real Estate Management - University of Pennsylvania, Wharton School of Business

REGISTRATION

Registered Architect – Number RA007889X Commonwealth of Pennsylvania, 1978-Present

BOARDS & COMMITTEES

National Trust for Historic Preservation

Member of Board of Trustees – 2022-Present

Pittsburgh History & Landmarks Foundation

Member of Board of Trustees of Landmarks Development Corporation – 2004 -2010

Foundation Board Vice Chair of Board 2010 - Present

Presbyterian SeniorCare Network

Member of the Board of Directors – 2004-Present

Board Chair – 2022-2025

University of Arkansas, School Architecture

Member of the Professional Advisory Board - 2020-Present

University of Notre Dame, School Architecture

Member of the Advisory Council - 2019-Present

Green Building Alliance – board member 2003 - Present

President of Board of Directors – 2010

Allegheny Land Trust

Member of the Board of Directors – 2001-2010

Vice President of Board – 2004 - 2010

Associated Artists of Pittsburgh

Member of the Board of Directors – 2000-2003

Member of the Advisory Board – 2004-Present

American Institute of Architects – member 1975-Present

President of the Pittsburgh Board of Directors-1988

President of the Pennsylvania Board of Directors-1991, 2011

Chair of the National Minority Resource Committee- 1992-1993

Member of the National Board of Directors – 2012-2015

College of Fellows, invested - 2016

President of the National Board of Directors - 2019

Pittsburgh Chamber of Commerce

Leadership Pittsburgh Program Class V - 1989

Pittsburgh Architects' Workshop

President of the Board of Directors – 1980-1985

Remaking Cities Conference (1988 international conference on rustbelt revitalization)
1988 Executive Committee Member
2013 Remaking Cities Conference Program Committee Member

National Organization of Minority Architects
Founding President of the Pittsburgh Chapter 2012 to present

Allegheny Trails Explorer Scouts 1982-1993
Architectural Post Founder and Advisor

APPOINTMENTS

Commonwealth of Pennsylvania
State Architects Licensure Board, Member then Vice President - 2022- Present

Allegheny County
Parks & Recreation Foundation, Board Secretary - 2007- Present
Parks & Recreation Commission - 2003- 2008
Facilities Assessment Taskforce - 1998 - 1999
Airport Development Commission, Environmental Chair - 1989-1991

Mt. Lebanon Uptown Design Review Board
Board Co-Chair– 1992-1995

Who's Who Among Black Americans - Gale Research Inc. - 1990 - Present

INTERNATIONAL Recognition
Royal Institute of British Architects: Honorary Member
Japanese Institute of Architects: Honorary Member
Korea Institute of Architects: Honorary Member
Royal Canadian Institute of Architects: Honorary Member
Siamese Institute of Architects: Honorary Member