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August 8, 2025

BY IZIS

Mr. Anthony J. Hood, Chairman
D.C. Zoning Commission
One Judiciary Square
441 4th Street, N.W.
Second Floor
Washington, D.C. 20001

Re: Application of The Wesley Theological Seminary of the United Methodist Church
for Further Processing of a Campus Plan (2025-2035) (ZC 23-08(1))
4500 Massachusetts Avenue, N.W.
Square 1600, Lots 6 (818 and 819), 7, 8 and 9.

Dear Chairman Hood and Members of the Commission:

The Wesley Theological Seminary (“Wesley”), as requested, respectfully submits the attached Application for Further Processing of its approved Campus Plan (ZC Case No. 23-08(1)), including the following filing requirements:

1. Application Statement and Supporting Exhibits
2. Executed Application Signature Form
3. Authorization Letter
4. Building Plat
5. Certificate of Notice of Intent and Copy of Notice
6. 200 Foot Property Owner List

Preprinted mailing labels and a check for the \$3,250.00 filing fee will be delivered to the Office of Zoning by hand-delivery.



GREENSTEIN DELORME & LUCHS, P.C.

www.gdlaw.com

Mr. Anthony J. Hood, Chairman

August 8, 2025

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Wesley looks forward to presenting this application to the Zoning Commission at the earliest available public hearing date.

Thank you for continued assistance in this matter.

Very truly yours,

GREENSTEIN DELORME & LUCHS, P.C.

John Patrick Brown, Jr.

Lyle M. Blanchard

Enclosures

CERTIFICATE OF SERVICE

I hereby certify that on August 8, 2025, the foregoing Application for Further Processing was delivered via electronic mail to the following:

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John Patrick Brown, Jr.



Movie Night on the Wesley Sledding Hill (2024)

THE WESLEY THEOLOGICAL SEMINARY



ANSWER THE CALL

**APPLICATION FOR FURTHER PROCESSING OF
A CAMPUS PLAN TO THRIVE IN PLACE**

YEAR 2025 THROUGH 2035

Z.C. CASE NO. 23-08(1)

AUGUST 8, 2025

I. Summary of Requested Action

This is an application of The Wesley Theological Seminary of The United Methodist Church (“Wesley” or “Seminary”) for review and approval of a Further Processing Application for the construction of the new “university housing”¹ (“New University Housing”) and related campus improvement projects (“Application”) pursuant to Subtitle X, § 101.1 of Title 11, District of Columbia Municipal Regulations (“Zoning Regulations”). As discussed in detail in this statement, this Further Processing application is entirely consistent with the Zoning Commission’s approval of the 2025 Thrive in Place Campus Plan in ZC Case 23-08(1)(“2025 Campus Plan”). Specifically, this application seeks Further Processing approval of the following elements of the approved 2025 Campus Plan:

- Raze Old President’s House and Restore Site with Enhanced Landscaping and Neighborhood Playground
- Raze Carroll and Straughn Halls, Maintenance Building, and Surface Parking Lot
- Construct New University Housing for Wesley and American University Students, Faculty, and Staff
- Maintain and Enhance Green Open Space with Additional Landscaping Plan
- Implement Traffic Demand Management Plan and Performance Monitoring Plan
- Construct Public Space Improvements Requested by DDOT
- Implement Campus Security Plan

¹ See 11 DCMR, Subtitle X, § 101.5 (2025).

- Implement Construction Management Plan
- Cooperation with American University
- Establish and Fund Ward 3 Inclusionary Zoning Fund to be Administered by Local Initiatives Support Corporation with Appropriate and Enforceable Monitoring Mechanisms

II. Site Location and Consistency with the 2021 Campus Plan

The current Campus is comprised of Lots 6 (A&T Lots 818 and 819), 7, 8, and 9 in Square 1600 with a total area of 381,787 square feet (8.77 acres). Exhibit C. The Campus is improved with eight (8) buildings, including three student residence buildings (Straughn Hall, Carroll Hall, and the 2014 Dorm); the Library; Kresge Academic Hall; Trott Hall and Chapel; a small one-story maintenance building; and the Old President's House on University Avenue. The current total gross floor area of the Campus is approximately 166,916 square feet. All of the existing buildings were part of the original Campus project, except the new residence hall which was completed and occupied in 2014 ("2014 Dorm"). The Campus has a total of 174 surface parking spaces, including 143 in the parking lot in the center of the Campus and an additional 31 spaces located along the interior roadways. Vehicular ingress and egress is provided to and from the existing Massachusetts Avenue driveway. Vehicles leaving the Campus can only turn right onto Massachusetts Avenue. The University Avenue driveway is currently exit only for right turn only with no left turn or straight movement permitted. A limited number of delivery and service vehicles are allowed to enter the Campus from University Avenue.

This Further Processing application is consistent with and implements the approved 2025 Campus Plan for the entire campus property. The central feature of the Campus Plan is the New

University Housing and the related razes and improvements to the campus as more fully described herein.

III. Community Outreach and Input

For Wesley, its role in the community and relationship with its neighbors is very important and a natural extension of its ministry. Beginning with its inaugural campus plan in 2005 and over the last twenty years, this community engagement has continued through the established Community Liaison Committee (“CLC”), Advisory Neighborhood Commissions 3D and 3E, other established neighborhood organizations, including the Neighbors for Living Community, Spring Valley-Wesley Heights Citizens Association, Spring Valley Neighborhood Association, and other interested parties and individuals. This process has been candid and productive at every stage of Wesley Seminary’s evolving campus plans and will be continued throughout the processing of this application.

Outreach to the community for this proposed plan began in 2019. Although this process was slowed by an unforeseen change in development partners and the COVID-19 emergency, these meetings were fully renewed in 2021 and continues to be extensive, including at least forty-six formal meetings (CLC-20; ANC 3D-22; ANC 3E-4) and more numerous informal meetings and discussions.

Date	Meetings / Presentations
July 30, 2019	CLC Meeting
April 1, 2020	CLC Meeting
December 1, 2020	Meeting with Troy Kravitz, ANC 3D02, Elizabeth Pemmerl, ANC 3D03-Elect
January 14, 2021	CLC Meeting
February 3, 2021	ANC 3D Meeting

Date	Meetings / Presentations
February 18, 2021	CLC Meeting
September 9, 2021	CLC Meeting
October 21, 2020	CLC Meeting
November 3, 2021	ANC 3D Meeting
December 8, 2021	ANC 3D Meeting
February 16, 2021	CLC Meeting
March 2, 2022	ANC 3D Meeting
March 9, 2022	CLC Meeting
March 30, 2022	CLC Meeting
April 6, 2022	ANC 3D Meeting
April 21, 2022	ANC 3E Meeting
May 9, 2022	CLC Meeting
May 12, 2022	CLC Meeting – Transportation Focused
May 12, 2022	CLC Meeting
May 24, 2022	CLC Meeting
June 1, 2022	ANC 3D Meeting
September 7, 2022	ANC 3D Meeting
November 2, 2022	ANC 3D Meeting
January 31, 2023	PUD 101 Introduction by OAG, ANC 3D
February 8, 2023	CLC Meeting
March 22, 2023	CLC Meeting
April 4, 2023	ANC 3D Meeting
May 3, 2023	ANC 3D Meeting
May 15, 2023	CLC Meeting
July 5, 2023	ANC 3D Meeting
July 25, 2023	ANC 3E Meeting
August 8, 2023	CLC Meeting
August 14, 2023	ANC 3D Meeting
September 6, 2023	ANC 3D Meeting
February 7, 2024	ANC 3D Meeting
March 4, 2024	CLC Meeting
March 6, 2024	ANC 3D Meeting
April 3, 2024	ANC 3D Meeting
April 11, 2024	ANC 3E Meeting
May 1, 2024	ANC 3D Meeting
July 10, 2024	ANC 3D Meeting

Date	Meetings / Presentations
September 23, 2024	ANC 3E Meeting
January 8, 2025	ANC 3D Meeting
February 20, 2025	CLC Meeting
April 2, 2025	ANC 3D Meeting
May 7, 2025	ANC 3D (scheduled)
May 8, 2025	ANC 3E (scheduled)
June 18, 2025	CLC Meeting (CTR)

Feedback from the community has resulted in changes to the New University Housing’s design, including setback and orientation, reduction in height, gross floor area, and parking spaces, additional landscaping and increased Green Area Ratio, enhanced sustainability, public space and pedestrian improvements, and the inclusion of a community playground. Additionally, the Seminary continues to discuss the provision of support for affordable housing within Ward 3 with the ANCs and others.

IV. Further Processing Approval - Project Description

This further processing application is intended to obtain approval for implementation of all elements of the approved 2025 Campus Plan, including:

A. Raze Old President’s House and Restore Site with Landscaping

The Old President’s House is located on the three lots on University Avenue. This two-story, 4,538 square-foot building is no longer habitable and has not been used for its intended purpose for twenty years. The building and associated paved parking area and University Avenue curb cut will be razed. This area will be re-landscaped, including a small community playground to maintain and enhance the existing Green Open Space along University Avenue. Exhibit F (Landscape Plan, Playground, GAR).

B. Raze Carroll and Straughn Halls, Maintenance Building and Surface Parking Lot

The two 1960 – era original dorms, Carroll Hall (27,533 square feet) and Straughn Hall (29,866 square feet), that surround the existing surface parking will be razed. Together, these two-story buildings provide ninety beds. Carroll Hall is significant to the Seminary’s housing inventory because it provides family-style units for married students and their families.

Replacement of this critical family housing will be facilitated by the proposed New University Housing.



Carroll Hall Family Apartments, above; Straughn Hall, below.



At the center of the Campus, the surface parking lot with 143 spaces and adjacent one-story maintenance building will also be demolished.

C. New University Housing for Wesley and American University Students, Faculty, and Staff

The New University Housing (e.g. dormitory) is exclusively for Wesley and American University (“A.U.”) students, faculty, and staff needing local housing and will be located in the area of the existing surface parking lot. The building will be seven stories with an height of 74 feet, 8 inches, and nestled between the existing Seminary buildings and the immediately adjacent and taller A.U. buildings. Exhibit G (Architectural Plans, Elevations, Sections). The originally proposed habitable penthouse top level (17,183 square feet) has been eliminated from the plan. This purpose-built university housing will be approximately 282,061 square feet and have approximately 215 living units configured in studio, one-bedroom units, and two, three, four, and five bedroom co-living units with a total of no more than 659 beds. Each unit will provide a kitchen and the co-living units will include an additional common area as well as private key entry bedrooms and baths. At the urging of the community, the top levels of the building facing University Avenue have been further setback 27.5 - 32.5 feet from the University Avenue face of the building by eliminating four units with twenty beds. Additionally, the layout of the top-level units has been rotated ninety-degrees so that windowless walls now face University Avenue, the top/penthouse level was most recently eliminated reducing the building GFA by 17,183 square feet. Finally, 99 spaces have been eliminated from the underground parking garage. The building will have two levels of underground parking with 264 parking spaces and internal loading and trash facilities. Approximately 77 of the parking spaces are replacement spaces for Wesley’s exclusive use. Additionally, the Seminary’s maintenance facilities and storage will be located in the underground parking garage.

The new building will be first-class university housing with amenities, including purpose-designed study areas with group and individual spaces, a computer lounge, activity club room,

and an outdoor interior courtyard. The New University Housing will include an access security system and security cameras will be installed throughout the Campus. The building design will be compatible and complementary to the existing Wesley buildings and will focus on sustainability and is designed to achieve the equivalent of LEED Mid-Rise Residential Gold certification ensuring it meets high standards for energy efficiency and environmental performance. The building will utilize environmentally-preferred materials and will feature rooftop solar panels, green roof, advanced stormwater management systems, and bioretention facilities. The Campus will achieve a Green Area Ratio of at least 0.60 – above the minimum 0.40 required. Exhibit F (Landscape Plan, Playground, GAR).

The New University Housing will be developed through a long-term (99 year) ground lease for a portion of the Campus (Lot 819) between Wesley Seminary and Landmark Properties (“Landmark”). Wesley Seminary will receive a lump sum initial payment and annual guaranteed ground rent payments. Landmark will be responsible for the construction and operation of the new building. Use of the ground lease property is strictly and perpetually limited to first-class university housing and subject to approval of this Application by the Zoning Commission. At the conclusion of the ground lease, ownership of the building will revert to Wesley Seminary. For colleges and universities nationwide, it is now common practice to rely on private companies to provide customary campus services, including housing, food service, bookstores, and personal and convenience services.

The Seminary is currently tax exempt for its real estate and operations in the District of Columbia. Under the recorded ground lease for the New Dormitory (Lot 819), Landmark will not be tax exempt and will be liable for substantial annual District taxes on the land, improvements and operations for the New University Housing.

D. No Development of University Avenue Residential Lots

The three residential lots on University Avenue (Lots 7, 8 and 9) were re-incorporated in the Spring Valley Campus in 2012 in Zoning Commission Case Number 05-40A. After the demolition of the Old President's House, there is no plan to develop these lots for campus use, except for the proposed neighborhood playground and landscaping. The three lots will remain part of the Green Open Space along University Avenue.

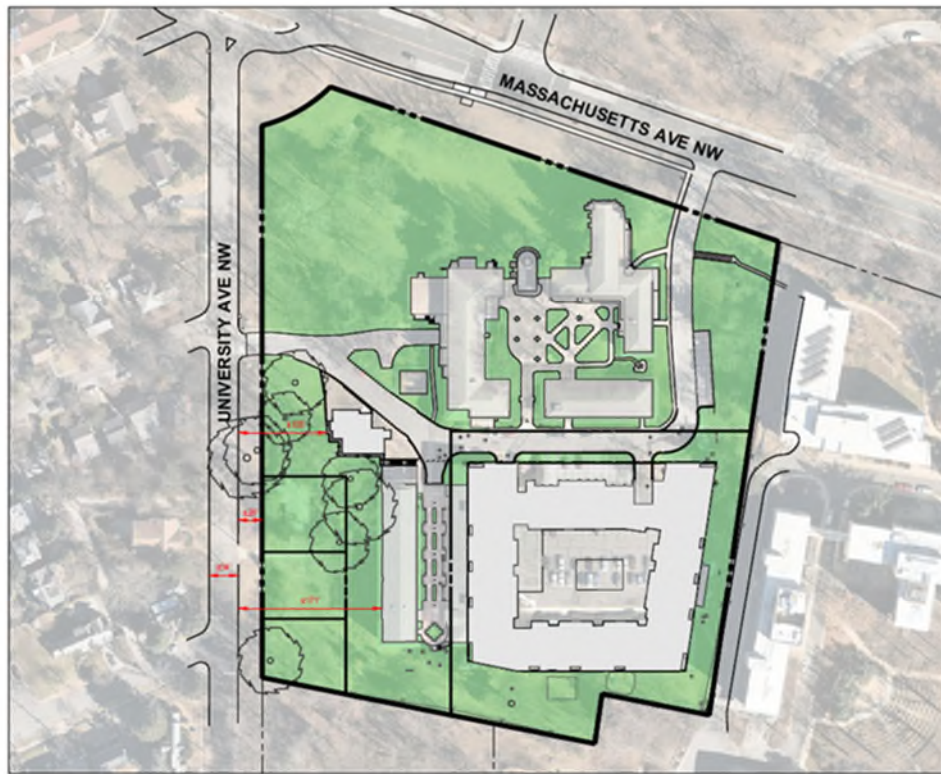
E. Maintain "Hilltop" Campus

Under this Plan, the established building perimeter formed by the 2014 Dorm, Kresge Hall, Trott Hall, Chapel, Library and A.U. Campus is maintained with the New University Housing located in the central core of the existing Campus. The Hilltop Campus is surrounded by and isolated from the adjoining neighborhood by the substantial Green Open Space on Massachusetts Avenue and University Avenue. Exhibit H (Massachusetts and University Avenues Street Views of Hilltop Campus).

F. Maintain and Enhance Green Open Space Buffer Zone on University Avenue and Massachusetts Avenue

The Green Open Area that defines the Spring Valley Campus will be maintained and enhanced. No development is proposed for the Green Open Space which is notable for its abundant Heritage (27) and Special (76) Trees and landscaping that was previously enhanced under the 2012 Campus Plan. Under this Plan, even more landscaping will be added at the former Old President's House site, along University Avenue, at the University Avenue driveway and site of the formally proposed Administration and Maintenance Building, and at the Massachusetts Avenue entrance. Exhibit F.

The existing Green Open Space and enhancements will create a larger and more sustainable buffer for the neighborhood, especially on University Avenue. From the 2014 Dorm to the east curb of University Avenue it is 171 feet, and to the west curb of University Avenue 205 feet. From the New University Housing, it is 300 feet (a football field length) to the east curb of University Avenue. From the New University Housing across Massachusetts Avenue and the AU property, it is approximately 660 feet (more than two football fields) to be nearest residential properties in the 4400 block of Sedgwick Street, N.W. Fully fifty-three (53) percent of the Spring Valley Campus area (205,000 square feet or 4.7 acres) will remain undeveloped and devoted to Green Open Space. In addition to the Green Open Space, there will be an additional 37,000 square feet of formally landscaped area on the campus.



ULTIMATE OPEN SPACE EXHIBIT

WESLEY THEOLOGICAL SEMINARY

4500 MASSACHUSETTS AVE NW, WASHINGTON, DC 20016



G. Enhanced Landscaping Plan

The entire Wesley campus and especially the perimeter Green Open Space enjoys a mature and well-maintained forestation and landscaping, including a remarkable twenty-seven (27) Heritage and seventy-six (76) Special Trees. Exhibit F. The updated Landscape Plan preserves, protects and builds upon the existing landscaping and enhances that landscaping with targeted new landscaping. The New University Housing and campus core will be substantially landscaped. More significantly, substantial additional landscaping will be added along University Avenue focused on the University Avenue driveway and street frontage and at the location of the Old President's House and new Neighborhood Playground. Exhibit F. The impact of this new landscaping is to enhance the natural buffer between the Campus and the Spring Valley neighborhood. The tree replacement ratio is 4.5 new trees for every one tree removed. No Heritage trees are to be removed. The project is currently planning to preserve 177 existing trees (to include 27 heritage trees and 76 special trees) and remove 22 trees with this project. The current landscape/GAR plan is proposing to replant a minimum of 100 trees (combination of canopy trees and understory trees) to achieve a GAR of at least 0.60. Exhibit F.

H. Neighborhood Playground

The Spring Valley neighborhood has requested that the Seminary build and maintain a small neighborhood playground on the Wesley Campus as a community amenity. In addition to its much enjoyed "Sledding Hill", Wesley Seminary is pleased to dedicate the space and the improvements for this new neighborhood serving project. The proposed neighborhood playground would be setback back approximately forty feet from University Avenue in the area of the three former residential lots. The playground will measure approximately 40 feet by 95

feet and have an area of approximately 3,800 square feet with a natural double shredded hardwood mulch safety surface surrounded by a 48-inch-tall vinyl-coated chain link perimeter fence. It will include benches and play equipment suitable for toddlers and young children. The playground will have a public point of entry adjacent to University Avenue, N.W. by means of an accessible sidewalk. It will be fenced and open to the public only during daylight hours. The final design of the playground will be substantially in accordance with Exhibit F and will include community input.

I. 300,740 Square Feet of Unused Gross Floor Area

By maintaining the substantial Green Open Space and limiting the size and location of new development, Wesley Seminary has not utilized a substantial level of the permitted 1.8 FAR for the Campus. As proposed, total development is limited to about 387,040 square feet or 1.014 FAR. As a result, more than 300,740 square feet of development potential will remain unused.

Wesley Campus Area	
Lot 6 A&T Lot 818 (WTS) – 243,124 sq. ft. A&T Lot 819 (Landmark) – 113,758 sq. ft.	356,882 sq. ft.
Lot 7	9,000 sq. ft.
Lot 8	8,000 sq. ft.
Lot 9	7,996 sq. ft.
Total Campus Land Area	381,878 sq. ft. (8.78 acres)
Total GFA @ 1.08 FAR	412,428 sq. ft.
Total GFA @ 1.8 FAR (Campus)	687,780 sq. ft.

Current / Proposed Development GFA		
Building	Current	Proposed
Straughn Hall	29,866 sq. ft.	0 sq. ft.
Carroll Hall	27,533 sq. ft.	0 sq. ft.
Old President House	4,538 sq. ft.	0 sq. ft.
Library	16,630 sq. ft.	16,630 sq. ft.
Trott Hall / Chapel	26,335 sq. ft.	26,355 sq. ft.
Kresge	32,819 sq. ft.	32,819 sq. ft.
2014 Dorm	29,195 sq. ft.	29,195 sq. ft.
New Admin Building	0 sq. ft.	0 sq. ft.
New Dormitory	0 sq. ft.	282,061 sq. ft.
Total	166,916 sq. ft.	387,040 sq. ft. (1.07 FAR)
Unused Campus GFA	--	300,740 sq. ft.

J. Implement Transportation Demand Management and Performance Monitoring Plans

Transportation Demand Management

In close consultation with DDOT, Wesley has accepted and will implement the “robust” Transportation Demand Management (TDM) Plan in order to reduce travel demand or to redistribute demand to other times or spaces. TDM elements typically focus on reducing the demand of single-occupancy, private vehicles during peak period travel times or on shifting single-occupancy vehicular demand to off-peak periods. Beyond the enumerated TDM, Wesley will explore other innovative TDM strategies and will coordinate the implementation of those strategies with goDCgo and DDOT’s TDM Team.

- Unbundle the cost of vehicle parking from the lease for each residential unit and charge a minimum rate based on the average market rate within a quarter mile. Only monthly or by semester rates will be charged. Free parking, validation, or discounted rates will not be offered.
- Of the 264 parking spaces within the Project’s garage, at least six (6) will have electrical vehicle charging stations per DDOT’s recommendation of one (1) charging station for every 50 parking spaces.
- Will work with American University to allow occupants of the New University Housing, including WTS students, faculty, and employees to use the AU shuttle to the Metrorail Station.
- Identify a Transportation Coordinator for the WTS campus. The Transportation Coordinator will act as a point of contact with DDOT, goDCgo, and Zoning Enforcement.
- Will provide Transportation Coordinator’s contact information to goDCgo, conduct an annual commuter survey of employees on-site, and report TDM activities and data collection efforts to goDCgo once per year.
- Transportation Coordinator will develop, distribute, and market various transportation alternatives and options to the residents, including promoting transportation events (i.e., Bike to Work Day, National Walking Day, Car Free Day) on property website and in any internal building newsletters or communications.

- Transportation Coordinator will receive TDM training from goDCgo to learn about the transportation conditions for this project and available options for implementing the TDM Plan and PMP.
- Provide residents who wish to carpool with detailed carpooling information and will be referred to other carpool matching services sponsored by the Metropolitan Washington Council of Governments (MWCOG) or other comparable service if MWCOG does not offer this in the future.
- Will meet ZR16 long-term bicycle parking requirements by providing at least 62 long-term spaces free of charge to residents. At least 50% of long-term spaces (at least 31 spaces) will be located horizontally on the floor of the bike room. At least 10% of long-term spaces (at least 6 spaces) will be served by electrical outlets for e-bikes/scooters. At least 5% of long-term spaces (at least 3 spaces) will be designed to accommodate larger cargo/tandem bikes (10 feet by 3 feet size). Each bike storage room will include a repair station.
- Will meet ZR16 short-term bicycle parking requirements by providing 12 short-term spaces via exterior bike racks on-campus.
- Provide welcome packets to all new residents that should, at a minimum, include the Metrorail pocket guide, brochures of local bus lines (Circulator and Metrobus), carpool and vanpool information, CaBi coupon or rack card, Guaranteed Ride Home (GRH) brochure, and the most recent DC Bike Map. Brochures can be ordered from DDOT's goDCgo program by emailing info@godcgo.com.
- Transportation Coordinator will subscribe to goDCgo's residential newsletter.
- Post all TDM commitments on the WTS website and resident message board, publicize availability, and allow the public to see what commitments have been promised.
- Offer a free SmarTrip card to every new resident and a complimentary Capital Bikeshare coupon good for one ride.
- Fund and install a 19-dock Capital Bikeshare (CaBi) station with 12 bikes and fund one-year of maintenance and operations costs on the campus, or at a location to be selected by DDOT.
- Additional scooter parking will be available outside the Wesley Library within a designated scooter corral.
- A ride share turn around area is proposed for convenient pick-up/drop-off operations.

- Install three (3) inverted-U bike racks near the entrance to the playground on University Avenue, either in the public right-of-way or on private property.

Performance Monitoring

This Performance Monitoring Plan (PMP) is Wesley Theological Seminary's plan to track progress towards its Transportation Demand Management (TDM) goals. The PMP is comprised of mode split surveys of students, internal Wesley data, and manual counts of vehicle and bicycle parking inventory and occupancy which will be compiled into monitoring reports submitted to DDOT. The purpose of the monitoring reports is to make data-driven decisions about which TDM measures, if any, need to be adjusted to meet TDM goals.

Beginning the first spring semester following opening of the New University Housing, monitoring will be performed, and reports will be prepared and submitted to DDOT annually until the trip goal has been met for two (2) consecutive years and then every other year for the duration of the term of the Campus Plan. As detailed in the April 29, 2022 Comprehensive Transportation Review and subsequent DDOT reports for the currently proposed campus plan, the proposed changes are expected to result in a net increase in vehicular trips of 14 additional morning peak hour trips and 33 additional afternoon peak hour trips. Thus, increasing the trip goal for the campus to 101 vehicle trips in either the weekday morning (AM) or weekday evening (PM) peak hours.

Wesley will be considered in compliance with the PMP if the vehicle trip goal of 101 peak hour trips is met.

The monitoring reports will include details regarding the following:

- Count of the number of morning and afternoon peak hour vehicular trips arriving at and departing from the campus;
 - Morning Peak Hour: Highest 1-hour between 6:30 AM – 9:30 AM
 - Afternoon Peak Hour: Highest 1-hour between 4:00 PM – 7:00 PM
 - Whether the campus is compliant with the PMP goals by generating no more than 101 peak hour vehicle trips during any of these periods.
- Survey to identify mode split, broken down by students and employees;
- Number of student, staff, and faculty parking permits issued;
- Student, staff, and faculty parking permit rates;
- Number of registered carpools;
- Number and location of any car-sharing spaces, alternative fuel vehicle parking spaces, carpool/vanpool spaces, and electric vehicle charging stations on campus;
- Inventory and occupancy of all on-site vehicular parking;
- Inventory and occupancy of long-term and short-term bicycle parking spaces; and
- Documentation of any changes to the overall transportation demand management (TDM) program from the previous year, including new or innovative policies being implemented but not explicitly required in the TDM plan agreed to during Zoning Commission approval.

This information will be collected using mode split surveys of students and employees, internal Wesley data, and manual counts of vehicle and bicycle parking inventory and occupancy.

K. Construct Public Space Improvements Requested by DDOT

Prior to issuance of any certificate of occupancy for any new building, Wesley will fund and construct the following pedestrian improvements:

- A sidewalk along the east side of University Avenue NW between Massachusetts Avenue and Rodman Street, subject to DDOT approval, with a lead walk into campus along at least one side of the site driveway;
- Install signage, crosswalk, and ADA curb ramps on the south leg of University Avenue at the Rodman Street intersection, subject to DDOT approval; and
- Install signage, crosswalk, and ADA curb ramps on the east leg of the campus driveway at the University Avenue and Sedgwick Street intersection or construct the crossing as a continuous sidewalk, subject to DDOT approval.
- Subject to obtaining future approval from American University to use the existing gate, install wayfinding signage on the Wesley Seminary campus directing students to the gated connection to the American University campus.

L. Implement Campus Security Plan

The 2025 Campus Plan implements enhanced campus-wide security features and is integrated with the physical, personnel and operational security features of the New University Housing. Exhibit I (New University Housing Security Features). For the first time, Wesley will install a network of campus-wide security cameras which will enhance security for students, faculty, staff, residents, and visitors, provide deterrence and allow for real time monitoring. This security will be integrated with and complement the security in the New University Housing.

M. Implement Construction Management Plan

The Seminary, in conjunction with Landmark, will work with the community to finalize and implement the attached Draft Construction Management Plan. Exhibit J. The Plan

will be based on respect for its neighbors and minimizing the impact of construction activities, including establishment of neighborhood construction management committee, pre-construction meetings and notice, limiting the use of University Avenue except as absolutely required, 24-hour point of contact, construction worker and construction vehicle parking prohibited on neighborhood streets, minimize on-street truck idling, stormwater management and erosion control, and remediation of any construction related damages.

N. Cooperation with American University

Over the past year, Wesley and American University have met on multiple occasions to discuss matters related to this Campus Plan. Such discussions will continue and address specific topics related to further processing, including but not limited to operational, construction, and other issues that affect the American University community and its Campus Plan.

Wesley will provide timely updates on the discussions with AU throughout the prehearing process to OP, ANC 3D and 3E, CLC and all other interested parties.

O. Establish and Fund Ward 3 Inclusionary Zoning Fund to be Administered by Local Initiatives Support Corporation with Appropriate Enforcement and Monitoring Mechanisms

This Campus Plan raised for the first time, a question not previously contemplated in the Zoning Regulations, of IZ applicability to housing developed by or on behalf of a university that is not exclusively for its students, faculty or staff. Subtitle C, § 1001.6 (c) provides a clear exemption from IZ for “[h]ousing developed by or on behalf of a local college or university exclusively for its students, faculty, or staff.” Clearly, student housing was

intended to be exempt from IZ, but the proposed university housing to be occupied also by students, faculty and staff from a different university was not contemplated.

The Zoning Regulations and DHCD never envisioned a situation where a dormitory would house students from more than one institution or that the Inclusionary Zoning (“IZ”) would be applicable to a student housing project. In fact, DC Code does not allow college or university students to be eligible for IZ without a parent or guardian:

§ 6-1041.06. Ineligibility of Students - Notwithstanding § 2-1402.21, a person enrolled as full-time student in a college or university shall not be eligible to apply to rent or purchase an inclusionary unit unless the annual income of his or her parent or guardian would qualify under the eligibility standards established by the Mayor, or unless the student is a part of a household that otherwise qualifies for the inclusionary unit.

Faced with this unique scenario, Wesley offered to meet the spirit of IZ compliance through a privately administered and DHCD supervised student only affordable housing plan for the proposed new university housing. ANC 3E and others raised concerns about the operation and need for on campus student affordable housing. Beyond these objections, ANC 3E has championed a solution which Wesley proposes to implement as part of this application. Specifically, ANC 3E has requested that Wesley provide support for the required quantity and affordability of IZ units at an off-site location within the boundaries of its Commission or more broadly in Ward 3.

Wesley remains committed to affordable housing in the District as part of its broader religious and educational mission and accepts ANC 3E’s challenge to provide and/or support new IZ housing focused in this neighborhood. As of this writing, Ward 3 has achieved only 17 percent of its target for new affordable housing units, and this proposal will be an

important contribution to the neighborhood's diversity, equity, and inclusion. See DMPED 36,000 by 2025 Dashboard.

More broadly, the possibility of new IZ units is threatened by dramatically reduced resources, including the Mayor's proposed substantial reduction in budget funding for the Housing Production Trust Fund and the current unavailability of other affordable housing funding and financing programs.

Text Amendment Solution (ZC 24-09)

The Zoning Commission recognized the unique circumstances posed by the New University Housing and inability to provide on-campus Inclusionary Zoning by enacting new Subtitle C, § 1006.10:

Wesley Theological Seminary shall provide off-site IZ located in Ward 3 as an enforceable condition to its 2025-2035 Campus Plan further processing to construct university housing on Wesley's campus, provided that the requirements of Subtitle C §§ 1006.1 - 1006.3(a)-(g), may be waived by the Zoning Commission for the off-site IZ. Depending on construction type, the off-site IZ provided shall be no less than Subtitle C § 1003.1 or § 1003.2 set-aside requirements, as applicable, and subject to the requirements of Subtitle C §§ 1006.5 - 1006.9. **Notwithstanding the foregoing, and for good cause shown, the Zoning Commission shall have broad discretion to determine that the off-site IZ requirement described in this provision can be satisfied by alternative means, including increasing the set-aside requirements described herein and/or by requiring Wesley to make a financial contribution, deemed sufficient by the Zoning Commission, to an organization(s) that will facilitate the construction of new affordable housing reserved for households at or below 60% of median family income for rental units** or at or below 80% of median family income for ownership units exclusively in Ward 3, provided that such alternative means is stated as an enforceable condition to the 2025-2035 Campus Plan further processing to construct university housing on Wesley's campus. (Emphasis Added)

APPLICABLE IZ REQUIREMENTS

The New University Housing will be Type 3 Construction which under Subtitle C, § 1003.1 (a) requires a minimum of ten percent (10%) of the residential gross floor area be set aside for Inclusionary Zoning units. In calculating the required level of IZ, Wesley has not exempted any of the area for exclusively Wesley units in the new building (30,513 sf.). Also, unlike other IZ projects with the affordable housing subsidized by an up to 20% bonus density, Wesley has not requested or realized any bonus density. The table below provides an Inclusionary Zoning Analysis for the New University Housing. As set forth, Wesley is proposing to provide the value of almost 11% in the form of an \$8 million proffer which exceeds the minimum 10% required, without any exemption for Wesley units or benefit of bonus density.

New University Housing – Inclusionary Zoning Analysis	
Proposed Total Gross Floor Area	282,061 sf
Net Residential Gross Floor Area	224,359 sf
Required IZ Set-Aside @ 10% (Type 3 Construction)	22,436 sf
Unrealized 20% IZ Bonus (Maximum)	56,412 sf
Unrealized Wesley IZ Exemption (90/659 beds = 13.6%)	30,513 sf
Estimated Value/Cost of 10% IZ @ \$325/sf	\$7,291,700

Proposed \$8,000,000.00 IZ Off-site IZ Fund @ 325/sf = 24,615 sf (10.97%)

1. Proposed Ward 3 Inclusionary Zoning Fund.

As acknowledged by the Zoning Commission during their deliberations on the Text Amendment, Wesley and Landmark are not affordable housing developers and as such cannot directly develop the offsite affordable housing. In collaboration with ANC 3E, Wesley made its best efforts to identify a Ward 3 development project(s) that would be willing to provide the offsite IZ units.

For a variety of reasons, this search proved unsuccessful. In addition to the high cost of Ward 3 affordable housing, limited potential sites, and increased cost of limited capital, Wesley encountered several obstacles that proved insurmountable. First, ongoing Ward 3 development projects were unwilling to increase their IZ programs due to the risks and delays that would be required to modify already secured project financing and in some cases the need to modify previous discretionary zoning approvals. The former Super Fresh site is one example of a seemingly good candidate, but the developer would not risk another judicial appeal after finally resolving a previous one after a lengthy zoning approval process with persistent opposition from a small community element. One developer of an ongoing Ward 3 project with its own substantial IZ component advised that substantially increasing IZ undermines the marketability of the project's market rate units. Finally, we learned from a number of developers that the timing of financial support offered by Wesley that would not be available until Wesley obtains its zoning approvals would be too late or uncertain to impact a planned or ongoing development project.

For all the stated reasons, Wesley has demonstrated “good cause shown” under § 1006.10 that the off-site IZ requirements can properly be satisfied by alternative means, including making a financial contribution deemed sufficient by the Commission as part of the Further Processing approval process.

Given these obstacles and upon the recommendation of DHCD and others, Wesley enlisted the assistance of Local Initiatives Support Corporation (“LISC”) to explore alternative means of compliance. LISC is a nationwide affordable housing community development organization that has operated in DC for 42 years. LISC has proposed to establish and administer a Ward 3 Inclusionary Zoning Housing Fund (“Ward 3 Housing Fund”) that would be

funded with a \$8 million dollar contribution from Wesley. The Ward 3 Housing Fund would be dedicated exclusively to the creation and preservation of affordable housing in Ward 3, including acquisition, construction, and/or long-term financing for qualified projects. The funding would be provided subject to covenants that ensure long-term affordability and established levels of affordability that meet or exceed the IZ requirements and be subject to DHCD review and supervision. As funds are repaid to the Ward 3 Fund, they may be recycled for new projects that meet the applicable requirements. Exhibit K (LISC Proposal for Ward 3 Housing Fund).

As will be more fully documented before and during the upcoming public hearing, the proposed \$8 million contribution exceeds the cost of the minimum level of required IZ associated with the proposed New University Housing and should be sufficient to subsidize at least the minimum level of required IZ over time in compliance with § 1006.10 with the potential additional longer-term benefits created by the revolving funds.

2. Operation of Ward 3 Inclusionary Zoning Fund

LISC is a Community Development Financial Institution, certified by the US Treasury Department, with over 40 years operating in the DC market. To date, LISC DC has invested \$557 million in the District, leading to the preservation or creation of over 15,000 affordable homes. LISC has experience managing revolving loan funds, similar to the proposed Ward 3 Housing Fund. LISC DC is a fund manager of the DC Preservation Fund, a \$50 million revolving loan fund, managed on behalf of DC Department of Housing and Community Development (DHCD). To date, LISC has preserved over 1,200 of units of affordable housing through this fund.

The purpose of the Ward 3 Housing Fund will be to: *Serve as a vehicle to offer flexible, low-cost capital to promote the production and preservation of affordable housing in Ward 3. Through blending Ward 3 funds with LISC capital, the Fund will add catalytic investment into Ward 3 affordable housing.*

The Ward 3 Housing Fund will operate with the following structure.

1. Execution of Ward 3 Grant Agreement between Wesley and LISC
 - a. The Grant Agreement will outline stipulations of the funding, including resident affordability requirements and geographic requirements (ensuring projects are located within Ward 3).
2. Receipt of Funds
 - a. Wesley will wire or transfer the Ward 3 Housing Fund capital to LISC and LISC will hold in a designated account, only to be drawn for specifically qualified projects. LISC manages a myriad of distinct capital sources across its national footprint.
3. Sourcing Projects
 - a. LISC has longstanding partnerships with mission-driven developers throughout the District, including affordable developers within Ward 3. They are currently engaged in 4 projects that are challenged to secure low-cost capital to make the affordable projects sustainable over time.
 - b. While LISC anticipates news of these funds will spread quickly within the affordable development world, LISC will also share information in local convenings such as through our work with [The Coalition](#) and [The Housing Association of Nonprofit Developers](#), through promoting availability of these funds on LISC's website, and preparing and disseminating term sheets.
 - c. Given the dearth of affordable development in Ward 3, they are confident this tool will be highly sought.

4. Vetting and Underwriting Projects

- a. Each loan will undergo LISC's rigorous underwriting process to ensure alignment with LISC's mission, feasibility, compliance with the Fund's goals, as well as the long term financial and strategic viability of the project.
- b. Among the main criteria that would be required, as applicable, include securing corporate and personal guarantees, securing a lien on the property, reviewing borrower financial statements, credit reports and Real Estate Owned (REO), analyzing borrower's experience and composition of the team, as well as analyzing the timing, financial and logistical hurdles to ensure the project is able to come to fruition.
- c. Each loan will be assessed through LISC's Credit review process and Credit Committee, where the loan will undergo another analysis to ensure project viability. Should the Committee approve the loan, they will begin the closing process.

5. Closing

- a. LISC legal or outside counsel will close the loans, in conjunction with LISC program officer who completed the underwriting and LISC loan closer.
- b. During project closing, counsel will incorporate long term affordability covenants, as tied to use of Ward 3 Housing Fund. Each project will have a covenant that meets or exceeds the specified affordability guidelines and term of enforcement.

6. Repayment

- a. As loans which have incorporated Ward 3 capital are repaid to LISC, LISC will replenish the Ward 3 Housing Fund with said capital, in order for capital to be revolved into future affordable Ward 3 projects.

7. Annual Report out of Projects

- a. On an annual basis, LISC will report out Ward 3 Housing Fund metrics in order to share project successes. LISC will report on Ward 3 Loan Fund capital expended to date, amount remaining, and amount revolved back. The report will list each project financed, including affordability tiers of each property, and the number of homes created or preserved as a result of this financing.

V. Satisfaction of Subtitle Z § 302.10 and Subtitle X § 101 Standards

The Campus Plan approved in ZC Case No. 23-08(1) (the”2025 Campus Plan) included the information that is required by Subtitle Z, § 302.10 (c)-(l) for Campus Plan approval. The information included in this application statement and the attached exhibits address Wesley’s satisfaction of the various conditions of the 2025 Campus Plan and the satisfaction of the further processing special exception standards enumerated in Subtitle X, § 101 and X § 901 of the Zoning Regulations.

A. *College or University which is an Academic Institution of Higher Learning*

By Act of the General Assembly of the State of Maryland, The Wesley Theological Seminary was chartered as an educational institution of higher learning. Wesley Seminary is fully accredited by The Association of Theological Schools in the United States and Canada, the Commission on Higher Education of The Middle States Association of Colleges and Schools, The University Senate of The United Methodist Church (Board of Higher Education and Ministry), and the District of Columbia Educational Licensure Commission.

B. *The Use is Located so that it is Not Likely to Become Objectionable to Neighboring Property*

For the reasons set forth below, the construction of the New University Housing and related campus and public space improvements is not likely to become objectionable to neighboring property.

1. Noise

Activities within the Campus Plan boundaries are centrally located and designed so as to minimize noise (and visual) impacts on the surrounding community. Exhibit H. New facilities proposed in this Campus Plan will also be centrally located and isolated from the surrounding neighborhood with minimum impact on the community in terms of noise. In an effort to reduce noise, the Seminary will continue to abide by the following measures:

- Locating Campus activities so as to satisfy the need of students, faculty and residents for a quiet and secure place to study, work and live, with attention to the need to minimize impacts on the community; and
- Locating and designing loading docks and mechanical systems to reduce, as much as possible, the noise they produce.

2. Traffic and Parking

The Seminary encourages the use of public transportation by all members of the Wesley community, while recognizing that not everyone has convenient access to public transportation and that some students, staff, and visitors must drive to campus due to other commitments, such as childcare, evening activities, disabilities, and the like. To mitigate traffic impacts of the campus on area streets, Wesley has further limited vehicles leaving the Campus from the University Avenue exit.

All students and residents on campus will be prohibited from parking on the neighborhood streets and will not be eligible to obtain Ward 3 Residential Parking Permits. As necessary, Wesley will undertake appropriate enforcement measures to address unauthorized parking on the neighborhood streets. Additionally, Wesley Seminary will implement the robust Transportation Demand Management Plan established by DDOT to meet the needs of the

campus over the ten-year term of the Plan. The effectiveness of the TDM will be monitored, verified and updated through the similarly robust Performance Monitoring Plan mandated by DDOT. Wesley and its traffic consultant, Gorove Slade, have submitted a new scoping form to DDOT and will continue to address any issues raised by DDOT.

3. Number of Students or Other Objectionable Conditions

The New University Housing and existing Wesley students on the Campus as strictly limited by the 2025 Campus Plan and the applicable conditions will isolate and focus campus activities away from the surrounding neighbors abutting the campus. All Wesley and AU students will be subject to applicable codes of conduct (Wesley, Landmark and/or AU) and enforcement measures that are warranted. As a result, objectionable conditions will be avoided, minimized or mitigated.

C. No “Commercial” Activity on Campus

The New University Housing approved under ZC Case No. 23-08(1) is not a commercial activity pursuant to 11 DCMR Subtitle X, § 101.5 (2025).

D. Compliance with the Maximum Bulk Requirement

The property within the Campus Plan boundaries is zoned RA-1. The Zoning Regulations limit campus development to an FAR of 1.8 (687,780 square feet). When added to all remaining buildings and structures on the Campus, development under this Campus Plan is well below the maximum permitted gross floor area prescribed for the Campus. Further, adding the New University Housing (282,061 sf) to the Campus brings the total gross floor area of development within the Campus Plan boundaries to a total of approximately 387,040 square feet

and an overall FAR of approximately 1.014. Approximately 300,740 square feet of available gross floor area will not be developed.

E. Submission of a Plan for Developing the Campus as a Whole

The Seminary's plan for developing the Campus as a whole, as required under 11 DCMR Subtitle X, § 101.8, was approved by the Zoning Commission in ZC Case No. 23-08(1). The approved 2025 Campus Plan includes details on buildings, parking and loading facilities, screening, signs, streets and public utility facilities, playground facility and a description of all activities and of the capacity of all present and proposed development. The construction of the New University Housing and related campus and public space improvements were both contemplated and approved in the 2025 Campus Plan. As set forth above, the size and height of the new housing and related campus and public space improvements are consistent with the 2025 Campus Plan.

F. Interim and Off-Campus Land Use

No interim or off-campus use of land is proposed as part of this application.

G. Compliance with the Policies of the District Elements of the Comprehensive Plan

The 2025 Campus Plan complies with the policies of the District Elements of the Comprehensive Plan. The continued educational use is consistent with the institutional designation on the Future Land Use Map of the Campus. In order to approve the Campus Plan, the Commission must find that the application is “not inconsistent with the Comprehensive Plan and with other adopted public policies . . . related to the subject site.” 11-X DCMR §§ 304.4(a), 500.3. As detailed below, the Campus Plan is not inconsistent with the Comprehensive Plan.

The District of Columbia Court of Appeals has consistently directed the Commission to review a Campus Plan application in the context of the Comprehensive Plan and other adopted public policies “as a whole” under this prong of the Campus Plan evaluation standard. That is, the Commission may find that a Campus Plan application is not inconsistent with the Comprehensive Plan even if the application presents actual or potential inconsistencies with individual objectives or elements of the Comprehensive Plan. Rather, the Commission must weigh and balance competing policy objectives and explain its analysis. As noted below, the Campus Plan is not inconsistent with the Comprehensive Plan and other adopted public policies, when reviewed as a whole.

1. *Future Land Use Map*: The Future Land Use Map (“FLUM”) includes the Campus in the Institutional Land Use Category. The Framework Element of the Comprehensive Plan, adopted in 2020, notes the following with regard to the Institutional Use Category:

This designation includes land and facilities occupied and used by colleges and universities, large private schools, hospitals, religious organizations, and similar institutions. While included in this category, smaller institutional uses such as churches are generally not mapped, unless they are located on sites that are several acres in size. Zoning designations vary depending on surrounding uses. Institutional uses are also permitted in other land use categories. 10-A DCMR § 227.18. A Campus Plan and further processing approval for the New University Housing is clearly consistent with and meets this standard.

The proposed Campus Plan is not inconsistent with the Institutional FLUM designation, as Wesley Seminary, including the New University Housing, is indeed an institutional use. It is one of the nation’s leading and largest graduate theological schools (most

of which are known as “seminaries” or “divinity schools”), consisting of a diverse student body and offering three Master’s degrees and a Doctor of Ministry, as well as several non-degree programs.

2. *Generalized Policy Map*: The “Generalized Policy Map” (“GPM”) designates the Campus as “Institutional Uses”. The Comprehensive Plan states that:

Much of the land identified as institutional on the map represents colleges and universities; change and infill can be expected on each campus consistent with campus plans. Other institutional sites, including hospitals and religious orders, likewise may see new buildings or facilities added. Policies in the Land Use and the Educational Facilities Elements address the compatibility of such uses with surrounding neighborhoods. 10-A DCMR § 225.22.

The Campus Plan will maintain and enhance the Seminary’s religious and educational mission and presence in the neighborhood, City-wide and beyond that is entirely consistent with the Institutional Uses designation.

3. *Land Use Element*: The Land Use Element is the cornerstone of the Comprehensive Plan. It establishes the basic policies guiding the physical form of the City, and provides direction on a range of development, conservation, and land use compatibility issues. The Land Use Element describes the balancing of priorities that must take place in order to accommodate a multiplicity of land uses within the boundaries of the District.

Colleges and Universities in general, and Wesley Seminary in particular, are a significant and vital land use in the District.

Institutional Uses occupy almost 2,300 acres - an area larger than all of Washington, DC’s retail, office, and hotel uses combined. These uses include colleges and

universities, private schools, childcare facilities, places of worship and other religious facilities, hospitals, private and nonprofit organizations, and similar entities. 317.1.

The District is home to about a dozen colleges and universities, enrolling more than 85,000 students. There are also nearly 70 non-local college and university programs that occupy space in Washington, DC. The District contains more than a dozen hospitals, some located on the campuses of its universities and others occupying their own campuses or federal enclaves. Hundreds of nonprofit and private institutions also operate within the District, ranging from private schools and seminaries to historic home museums and the headquarters of leading international organizations. Major Institutional Uses are shown on Map 37. 317.2.

Institutions make an important contribution to the District economy and are an integral part of Washington, DC's landscape and history. The colleges and universities alone employ 29,682 workers. Through partnerships with government and private industry, museums, higher education, and health care institutions provide services and resources to the community that could not possibly be provided by the government alone. 317.4.

The Campus Plan is consistent with various policies and guidance from the Land Use Element of the Comprehensive Plan, including policies related to: Transportation Impacts of Institutional Uses (*LU Policy 3.3.1*), Corporate Citizenship (*LU Policy 3.3.2*), and Non-Profits, Private Schools and Service Organizations (*LU Policy 3.3.3*).

Wesley Seminary has worked extensively with the community to develop a plan that responds to neighborhood concerns. Notably, the Seminary has reduced the height of the New University Housing and provided increased setbacks along the upper stories. The Project will include enhanced landscape buffering along the Campus perimeter, clustering the housing

interior to the lot and siting the new dorm adjacent to A.U.'s high rise New University Housing at the far northeast corner of the campus. Wesley has also committed to preserving heritage and special trees on the property, and constructing a playground for public use along University Avenue.

Educational facilities are encouraged to provide alternative transportation options to mitigate traffic and parking impacts. In this case, they will be mitigated, in part, by the reduction in FAR for the New University Housing. Additionally, the Seminary has worked diligently with DDOT to develop additional measures that have been provided in the Comprehensive Transportation Review. See Comprehensive Transportation Review, ZC Exhibits 16G, 19, 20A and 80.

4. *Transportation Element:* The Campus Plan is consistent with the policies of the Transportation Element of the Comprehensive Plan, including policies related to: Minimizing Off-Street Parking (*T Policy 1.1.8*), and Charging Infrastructure (*T Policy 5.2.2*).

The Proposed Campus Plan promotes various modes of transportation, including bicycle, pedestrian, and shuttle bus. The Project will improve pedestrian pathways and adds long-term and short-term bicycle parking spaces on campus. The underground parking in the New University Housing will provide 6-8 EV charging stations. The New University Housing will designate an on-campus ride-sharing pick-up and drop-off location and on-campus rental bike and scooter parking area.

5. *Housing Element:* The proposed Campus Plan is not inconsistent with the policies of the Housing Element of the Comprehensive Plan, which addresses the importance of housing to neighborhood quality in DC and the importance of providing housing opportunities

for all segments of the population throughout the District. In particular, colleges and universities should address the housing needs of the students and promote the use of such housing by their students. The Project will provide New University Housing consisting of approximately 215 units, consistent with the Student Housing policy (*H Policy 1.3.5*).

6. *Environmental Protection Element:* The proposed Campus Plan is not inconsistent with the policies of the Environmental Protection Element of the Comprehensive Plan. In particular, the Project would preserve existing heritage and special trees on Campus and install new landscape, maintaining the Campus' character as a wooded environment, consistent Tree Requirements in New Developments (*E Policy 2.1.2*). Additionally, the Project would advance Support for Green Building, as proposed the New University Housing will be certified LEED Gold (*E Policy 3.2.1*).

7. *Educational Facilities Element:* The Campus Plan is consistent with various policies and guidance from the Educational Facilities Element of the Comprehensive Plan, including policies related to: Corporate Citizenship (*EDU Policy 3.2.2*), Workforce Development (*EDU Policy 3.2.3*), Universities as Community Partners (*EDU Policy 3.2.3*), University Research Partnerships (*EDU Policy 3.2.5*), Balancing University Growth and Neighborhood Needs (*EDU Policy 3.3.2*), Universities as Large Landowners and Campus Plan Requirements (*EDU Policy 3.3.3*), and Student Housing (*EDU Policy 3.3.4*).

The proposed Campus Plan advances several of these policies by allowing it to operate as an open campus for the enjoyment of both students and neighbors. Additionally, it will expand its access by providing a neighborhood playground for public use, fulfilling an important priority for the neighborhood. Wesley Seminary sponsors an internship program that

places students at non-profit and community organizations throughout the District, and students provide assistance to the mission of several churches in the area.

The Campus Plan will advance goals related to housing as well, relieving rental pressures on the neighborhood's private housing stock by developing New University Housing on the Campus.

8. *Rock Creek West Area Element:* The Campus Plan is consistent with various policies and guidance from the Rock Creek West Area Element of the Comprehensive Plan, including policies related to: Economic Development (*RCW Policy 1.1.2*), Managing Institutional Uses (*RCW Policy 1.1.8*), Conserving Common Open Spaces (*RCW Policy 1.1.9*), and Managing Transportation Demand (*RCW Policy 1.1.11*).

The proposed Campus Plan will be consistent with the Comprehensive Plan, having a height and building design that is compatible with adjacent buildings on AU's Campus, and additional landscaping and maintenance of the perimeter buffer and large trees will reduce its visual impact overall. The demolition of the Old President's House will create a larger Green Open Space, providing an additional buffer between buildings and the street.

The Seminary has worked extensively with the community to ensure that the impact of the New University Housing is mitigated to the extent possible and has agreed to: 1) not increasing enrollment on the campus; 2) provide fewer parking spaces in proportion to the number of beds in the New University Housing; 3) prohibit residential parking permits for those living or working on the Campus; 4) restrict delivery movements; 5) and redirect vehicular traffic to an access point on Massachusetts Avenue.

For the reasons noted above, and discussed in detail in Exhibit L, the Campus Plan satisfies the first prong of the three-part Campus Plan evaluation standard as being not inconsistent with the Comprehensive Plan and related public policies as a whole.

H. Racial Equity and Comprehensive Plan Analysis.

The Campus Plan for Wesley has been evaluated through a racial equity lens, focusing on consistency with the D.C. Comprehensive Plan (“Comp Plan”) and the Zoning Commission’s Racial Equity Tool. Exhibit L (Comprehensive Plan and Racial Equity Analysis). The analysis assesses the proposed New University Housing’s impact on housing, displacement, access to opportunities, environmental changes, and community engagement to ensure equitable development.

Key Findings:

- Housing and Displacement
 - The proposed New University Housing will replace two existing dormitories, increasing capacity from 90 student beds to 659 without causing direct displacement.
 - Indirect displacement is not anticipated, as increased on-campus student housing will reduce pressure on the surrounding rental market.
 - The plan supports the Comp Plan’s goal of expanding affordable housing by freeing up lower-cost housing in adjacent neighborhoods.
- Physical Improvements and Sustainability
 - The project will incorporate green infrastructure, including a green roof, solar panels, stormwater management systems, bioretention facilities, and tree preservation efforts.
 - The New University Housing is designed to achieve LEED Mid-Rise Residential Gold certification, ensuring energy efficiency and the use of environmentally preferred materials.
 - Public space improvements will include landscaping along University Avenue, creating a more pedestrian-friendly environment.

- Access to Opportunities
 - The New University Housing’s proximity to the Tenleytown-AU Metro station and other transit options will enhance student access to jobs, services, and entertainment across the District.
 - The project will maintain and expand on-campus employment opportunities and continue to train students for religious and social service careers.
 - Access to recreational spaces, including a new neighborhood playground, Rock Creek Park, and the Friendship Recreation Center, will provide additional community benefits.

- Community Engagement and Priorities
 - 20 Community Liaison Meetings and 26 ANC Meetings (2019-2025) informed the planning process.
 - Community feedback led to significant modifications, including a reduction in building height, increased setbacks, and adjustments to the New University Housing’s top floor design to minimize visual impact.
 - The proposed campus plan aligns with local priorities by ensuring institutional expansion does not negatively affect the surrounding neighborhood.
 - In conclusion, the proposed campus plan aligns with the Comp Plan’s goals and advances racial equity by increasing on-campus student housing, enhancing environmental sustainability, improving access to opportunities, and responding to community priorities. The project mitigates displacement risks and promotes equitable development, benefiting both the student population and the surrounding neighborhood.

I. The Proposed Buildings are within the Floor Area Limit for the Campus as a Whole

The construction of the New University Housing and related campus and public space improvements will result in the creation of 282,061 square feet of Gross Floor Area which is consistent with the 2025 Campus Plan and the total campus FAR will remain within the FAR limit of 1.014 approved in ZC 23-08(1).

J. Referral to the District of Columbia Office of Planning, District Department of Transportation, and the Department of Energy and Environment

The Seminary has been in ongoing discussions with DDOT regarding the 2025 Campus Plan and the preparation of a scoping form to direct the preparation of a transportation statement for this application. Wesley will also continue to meet with representatives of the Office of Planning, DDOT Urban Forestry Administration, Department of Energy and the Environment, Department of Housing and Community Development, and other District agencies.

K. The Application is in Harmony with the General Purpose and Intent of the Zoning Regulations and Zoning Map

The Application is in harmony with the general purpose and intent of the Zoning Regulations and Zoning Map. The proposed uses are entirely consistent with the approved 2025 Campus Plan goals of creating New University Housing to serve Wesley and AU students, faculty, and staff. Also, the Application is in compliance with the Zoning Regulations requirement for further processing approval and consistent with the relevant District Policies of the Comprehensive Plan.

L. The Application will not Tend to Adversely Affect the use of Neighboring Properties

The construction of the New University Housing and related campus and public space improvements will not tend to adversely affect the use of neighboring properties. The New University Housing is located immediately adjacent to the taller AU buildings in the center of the campus, surrounded by the existing Wesley buildings, setback substantially from University avenue and Massachusetts avenue and further buffered by the existing and enhanced Green Open Area. Taken together, the New University Housing has taken steps to mitigate noise, lighting, traffic, and parking adverse impacts that would affect the neighboring properties.

Additionally, the Seminary has prepared a Construction Management and Campus Security Plan that will further mitigate adverse impacts.

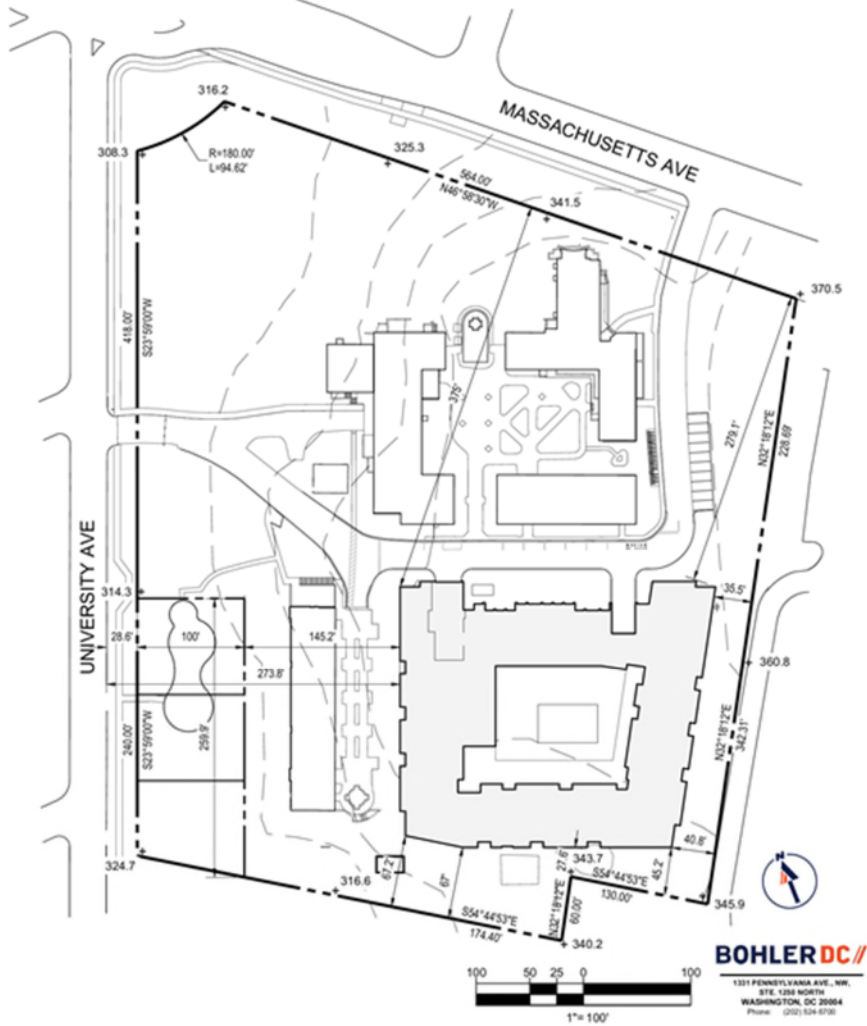
M. Satisfaction of the Test for Minor Variance Relief

The Zoning Regulations, under Subtitle X § 1000.3, authorizes the Zoning Commission to grant area variance relief as part of a campus plan application pursuant to the variance standards in Subtitle X § 1002.1. Specifically, Wesley is requesting an area variance for a minor deviation in the proposed height of the New Dormitory under the height restrictions in Subtitle F § 203.3 which provides:

An institutional building or structure may be erected to a height not exceeding ninety feet (90 ft.), not including the penthouse or rooftop structure, provided that the building or structure shall be removed from all lot lines of its lot a distance of not less than one foot (1 ft.) for each one foot (1 ft.) of height in excess of that authorized in the district in which it is located.

In the RA-1 Zone, the authorized height is 40 ft., subject to the provisions of § 203.3. The height of the proposed New Dormitory is 74'-8". As a result, § 203.3 requires the building to be setback 35'-0" from all lot lines. As shown on the Site Plan (Exhibit G), the New Dormitory is set back from the lot lines at least 35'-0" on the east along the north-south boundary with AU (35'-0"), on the north along Massachusetts Avenue (425' +/-) and to the west along University Avenue (300'). However, at the southern lot line the irregular "notch" in the property boundary with AU reduces the required setback to 27'-0" along only a limited portion of the lot line. Beyond the "notch" area, the setback substantially exceeds the minimum 35'-0" required. As a result, the Seminary is requesting an area variance from the height required by § 203.3.

WESLEY SEMINARY CAMPUS PLAN
EXHIBIT E - SITE ZONING PLAN



The burden of proof for an area variance is well established. The Seminary must demonstrate that (1) the property is affected by an exceptional or extraordinary situation or condition, that (2) the strict application of the Zoning Regulations will result in a practical difficulty to the applicant, and that (3) the granting of the variance will not cause substantial detriment to the public good nor substantially impair the intent purpose or integrity of the zone plan. As set forth below, the Seminary satisfies the three-part test for the requested variance relief.

Specifically, the Seminary is affected by several exceptional conditions that both individually and taken together dictate the location of the New Dormitory. The “notch” into the property creates an anomaly or unique configuration of the otherwise continuous straight southern lot line that extends to University Avenue. As a result, several practical difficulties result. The location of the New Dormitory is restricted by the existing improvements on the Campus, including the east-west driveway and walkways, the surrounding existing buildings (Library, Kresge Hall, and the 2014 Dorm), and Heritage Tree which prevents movement of the footprint to avoid the conflict created by the “notch”. Relocation of the New Dormitory in order to comply with the 35’-0” setback would encroach on the existing improvements, undermine the preservation of the Heritage Tree, and prevent the longstanding pedestrian and vehicular circulation on the Campus. These circumstances would be unduly burdensome, if not impossible, for the Seminary to achieve. Finally, the requested variance would be a substantial benefit to the public good, not a detriment, by locating the New Dormitory immediately adjacent to the existing and taller AU buildings and in the farthest corner of the Campus from the surrounding neighborhood on University Avenue and Massachusetts Avenue. This allowance for the isolated “notch” in the property line would not impair the purpose or intent of the RA-1 zone plan which provides for regulating height at this location.

VI. Satisfaction of Conditions of 2025 Campus Plan

The Seminary is undertaking compliance with the recently approved 2025 Campus Plan initiated by and in conjunction with this Further Processing application. Although its previous Campus plan (ZC 05-40, as amended and extended) is no longer applicable, it is worthwhile to note that Wesley maintained compliance with the critical elements of the earlier plan.

Significantly, the number of enrolled students, on-campus housing and employees remained substantially below the maximum permitted levels. At all times, the required level of on-campus parking has been maintained at 174 spaces.

In response to questions raised, Wesley wants to confirm the following. First, under ZC 05-40B (2016), the traffic monitoring could be suspended when the Seminary's enrollment fell below 505. Specifically, the 505 student enrollment threshold was clearly related only to the number of Masters students in 2011-2012 and excluded doctoral and other non-degree part-time students. (ZC 05-40B, Exhibit 9 (Masters Course Students for FY 2011 reported as 505)). Based on the record in the approved Campus Plan case, the total number of Masters only students from 2016 to date has never exceeded 505 and ranged from a high of 356 (2016) to a low of 249 (2023). (ZC 23-08(1), Exhibit 96). Also, annual monitoring of Wesley parking demand was not warranted or requested. For at least the last five years, the number of parking permits issued to Masters students and employees (only regular on campus parkers) has been equal to or less than the number of parking spaces provided on campus.

VII. Exhibits

The following exhibits are submitted in support of this Application:

Exhibit A: Application Signature Form

Exhibit B: Authorization Letter

Exhibit C: Building Plat

Exhibit D: Certificate of Notice of Intent and Copy of Notice

- Exhibit E: 200 Foot Property Owner List
- Exhibit F: Landscape Plan, Playground, GAR
- Exhibit G: New University Housing Architectural Plans, Elevations, Sections
- Exhibit H: Massachusetts and University Avenues Street Views of Hilltop Campus
- Exhibit I: New University Housing Security Features
- Exhibit J: Draft Construction Management Plan
- Exhibit K: LISC Proposal for Ward 3 Housing Fund
- Exhibit L: Comprehensive Plan and Racial Equity Analysis

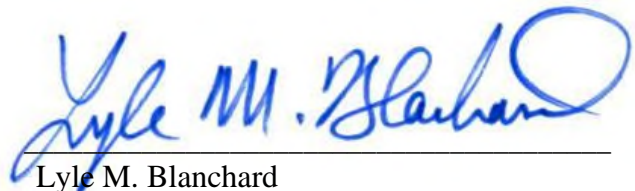
VIII. Conclusion

For the reasons set forth above, the Application meets the requirements for special exception approval. Wesley respectfully requests the Commission to schedule a public hearing at the earliest available date.

GREENSTEIN DELORME & LUCHS, P.C.



John Patrick Brown, Jr.



Lyle M. Blanchard

EXHIBIT “A”



BEFORE THE ZONING COMMISSION
FOR THE DISTRICT OF COLUMBIA



FORM 100 – APPLICATION SIGNATURE PAGE

All Zoning Commission applications shall be filed through the Interactive Zoning Information System (IZIS). Pursuant to Subtitle Z §§ 300.5, 301.4, and 302.4, please use Form 100 to provide the name(s), address(es), and signature(s) of each owner of property included in the area to be developed, or of the owner’s authorized agent.

PUD: 1st Stage 2nd Stage Consolidated

Modification: Minor Consequence Significance

Map Amendment

Design Review

Campus Plan

Time Extension

I/We hereby certify that the information contained on the application for the relief filed with the Zoning Commission is true and correct to the best of my/our knowledge, information, and belief. Any person(s) using a fictitious name or address and/or knowingly making any false statement on this application/petition is in violation of D.C. Law and subject to a fine of more than \$1,000 or 180 days’ imprisonment or both. (D.C. Official Code § 22 2405.)

Owner’s Name:	Rev. David McAllister-Wilson, President		
Owner’s Address:	The Wesley Theological Seminary of the United Methodist Church - 4500 Massachusetts Avenue, NW, Washington, DC		
Owner’s Signature:		Date:	08/08/2025

Owner’s Name:			
Owner’s Address:			
Owner’s Signature:		Date:	

Owner’s Name:			
Owner’s Address:			
Owner’s Signature:		Date:	

Owner’s Name:			
Owner’s Address:			
Owner’s Signature:		Date:	

Owner’s Name:			
Owner’s Address:			
Owner’s Signature:		Date:	

Owner’s Name:			
Owner’s Address:			
Owner’s Signature:		Date:	

Owner’s Name:			
Owner’s Address:			
Owner’s Signature:		Date:	

ANY APPLICATION THAT IS NOT COMPLETED IN ACCORDANCE WITH THE INSTRUCTIONS ON THIS FORM WILL NOT BE ACCEPTED.

EXHIBIT “B”



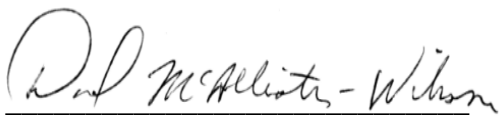
August 8, 2025

Mr. Anthony J. Hood, Chairperson
District of Columbia Zoning Commission
One Judiciary Square
441 4th Street, N.W.
Suite 210-South
Washington, D.C. 20001

Re: Application of The Wesley Theological Seminary of the United Methodist Church for Approval of Further Processing for A Campus Plan


Dear Chairperson Hood:

Please be advised that Wesley Seminary hereby authorizes the law firm of Greenstein, DeLorme & Luchs, P.C., as authorized agent (“Agent”), to file an application for further processing of a Campus Plan (Z.C. 23-08(1)).

By: 
Rev. David McAllister-Wilson
President, Wesley Theological Seminary

The Agents have read the Zoning Commission Rules of Practice and Procedure (11 DCMR, Subtitle Z) and are able to competently represent the Owner.

GREENSTEIN DELORME & LUCHS, P.C.

By: 
John Patrick Brown, Jr., Esq.
Agent

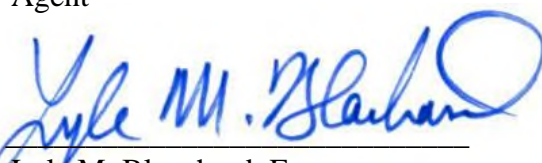
By: 
Lyle M. Blanchard, Esq.
Agent

EXHIBIT “C”

DISTRICT OF COLUMBIA GOVERNMENT
OFFICE OF THE SURVEYOR

Washington, D.C., November 16, 2021

Plat for Building Permit of: SQUARE 1600 Lots 7-9 & 818 - 819

Scale: 1 inch = 60 feet

Recorded in Book 201 Page 128 (Lots 7 - 9)
Book A & T Page 3887 - M (Lots 818 - 819)

Receipt No. 22-00897 Drawn by: A.S.

Furnished to: KAYLA SHATTUCK

"I hereby certify that the dimensions and configuration of the lot(s) hereon depicted are consistent with the records of the Office of the Surveyor unless otherwise noted, but may not reflect actual field measurements. The dimensions and configuration of A&T lots are provided by the Office of Tax and Revenue and may not necessarily agree with the deed description(s)."

Anup Shrestha
for Surveyor, D.C.

I hereby certify that on this plat on which the Office of the Surveyor has drawn the dimensions of this lot, I have accurately and completely depicted and labeled the following:

- 1) all existing buildings and improvements - including parking spaces, covered porches, decks and retaining walls over four feet above grade, and any existing face-on-line or party wall labeled as such, well as projections and improvements in public space - with complete and accurate dimensions;
- 2) all proposed demolition or raze of existing buildings duly labeled as such; all proposed buildings and improvements - including parking spaces, covered porches, decks and retaining walls over four feet above grade, any existing face-on-line or party wall labeled as such, as well as projections and improvements in public space and the improvements used to satisfy pervious surface or green area ratio requirements - with complete and accurate dimensions, in conformity with the plans submitted with building permit application _____; and
- 3) any existing chimney or vent on an adjacent property that is located within 10 feet of this lot.

I also hereby certify that:

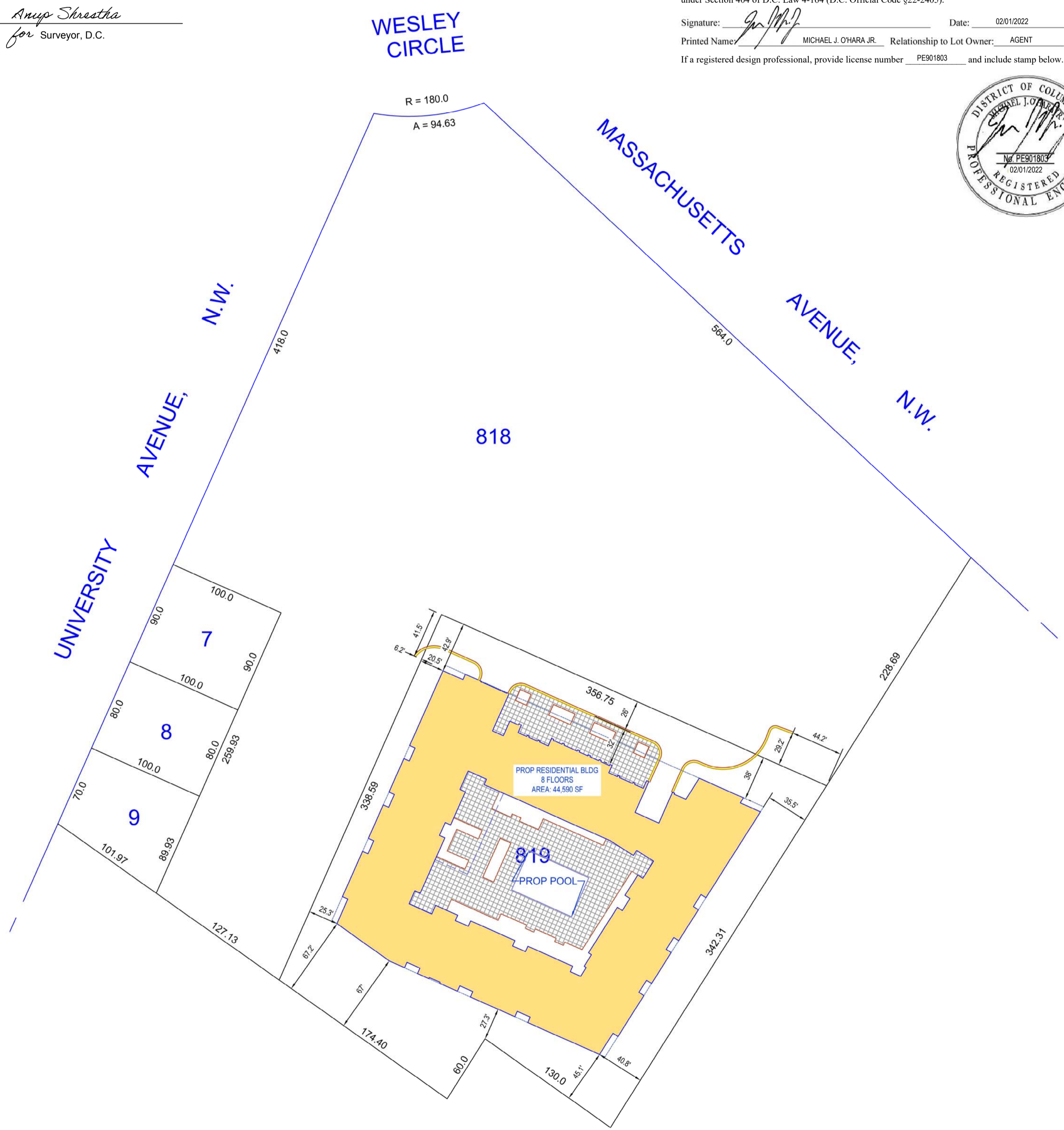
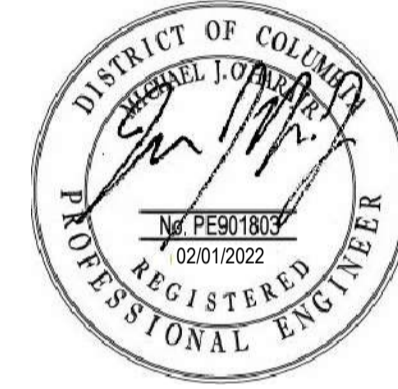
- 1) my depiction on this plat, as detailed above, is accurate and complete as of the date of my signature hereon;
- 2) there is no elevation change exceeding ten feet measured between lot lines; or if so, this elevation change is depicted on a site plan submitted with the plans for this permit application;
- 3) I have ~~filed~~ *circled one* filed a subdivision application with the Office of the Surveyor;
- 4) I have ~~filed~~ *circled one* filed a subdivision application with the Office of Tax & Revenue; and
- 5) if there are changes to the lot and its boundaries as shown on this plat, or to the proposed construction and plans as shown on this plat, that I shall obtain an updated plat from the Office of the Surveyor on which I will depict all existing and proposed construction and which I will then submit to the Office of the Zoning Administrator for review and approval prior to permit issuance.

The Office of the Zoning Administrator will only accept a Building Plat issued by the Office of the Surveyor within the two years prior to the date DCRA accepts a Building Permit Application as complete. I acknowledge that any inaccuracy or errors in my depiction on this plat will subject any permit or certificate of occupancy issued in reliance on this plat to enforcement, including revocation under Sections 105.6(1) and 110.5.2 of the Building Code (Title 12A of the DCMR) as well as prosecution and penalties under Section 404 of D.C. Law 4-164 (D.C. Official Code §22-2405).

Signature: *[Signature]* Date: 02/01/2022

Printed Name: MICHAEL J. OHARA JR. Relationship to Lot Owner: AGENT

If a registered design professional, provide license number PE901803 and include stamp below.



SR-22-00897(2021)

DISTRICT OF COLUMBIA GOVERNMENT
OFFICE OF THE SURVEYOR

Washington, D.C., November 16, 2021

Plat for Building Permit of: SQUARE 1600 Lots 7-9 & 818 - 819

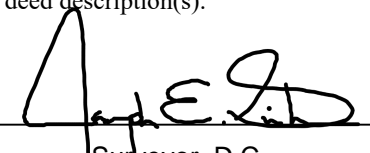
Scale: 1 inch = 60 feet

Recorded in Book 201 Page 128 (Lots 7 - 9)
Book A & T Page 3887 - M (Lots 818 - 819)

Receipt No. 22-00897 Drawn by: A.S.

Furnished to: KAYLA SHATTUCK

"I hereby certify that the dimensions and configuration of the lot(s) hereon depicted are consistent with the records of the Office of the Surveyor unless otherwise noted, but may not reflect actual field measurements. The dimensions and configuration of A&T lots are provided by the Office of Tax and Revenue and may not necessarily agree with the deed description(s)."


Surveyor, D.C.

I hereby certify that on this plat on which the Office of the Surveyor has drawn the dimensions of this lot, I have accurately and completely depicted and labeled the following:

- 1) all existing buildings and improvements - including parking spaces, covered porches, decks and retaining walls over four feet above grade, and any existing face-on-line or party wall labeled as such, well as projections and improvements in public space - with complete and accurate dimensions;
- 2) all proposed demolition or raze of existing buildings duly labeled as such; all proposed buildings and improvements - including parking spaces, covered porches, decks and retaining walls over four feet above grade, any existing face-on-line or party wall labeled as such, as well as projections and improvements in public space and the improvements used to satisfy previous surface or green area ratio requirements - with complete and accurate dimensions, in conformity with the plans submitted with building permit application _____; and
- 3) any existing chimney or vent on an adjacent property that is located within 10 feet of this lot.

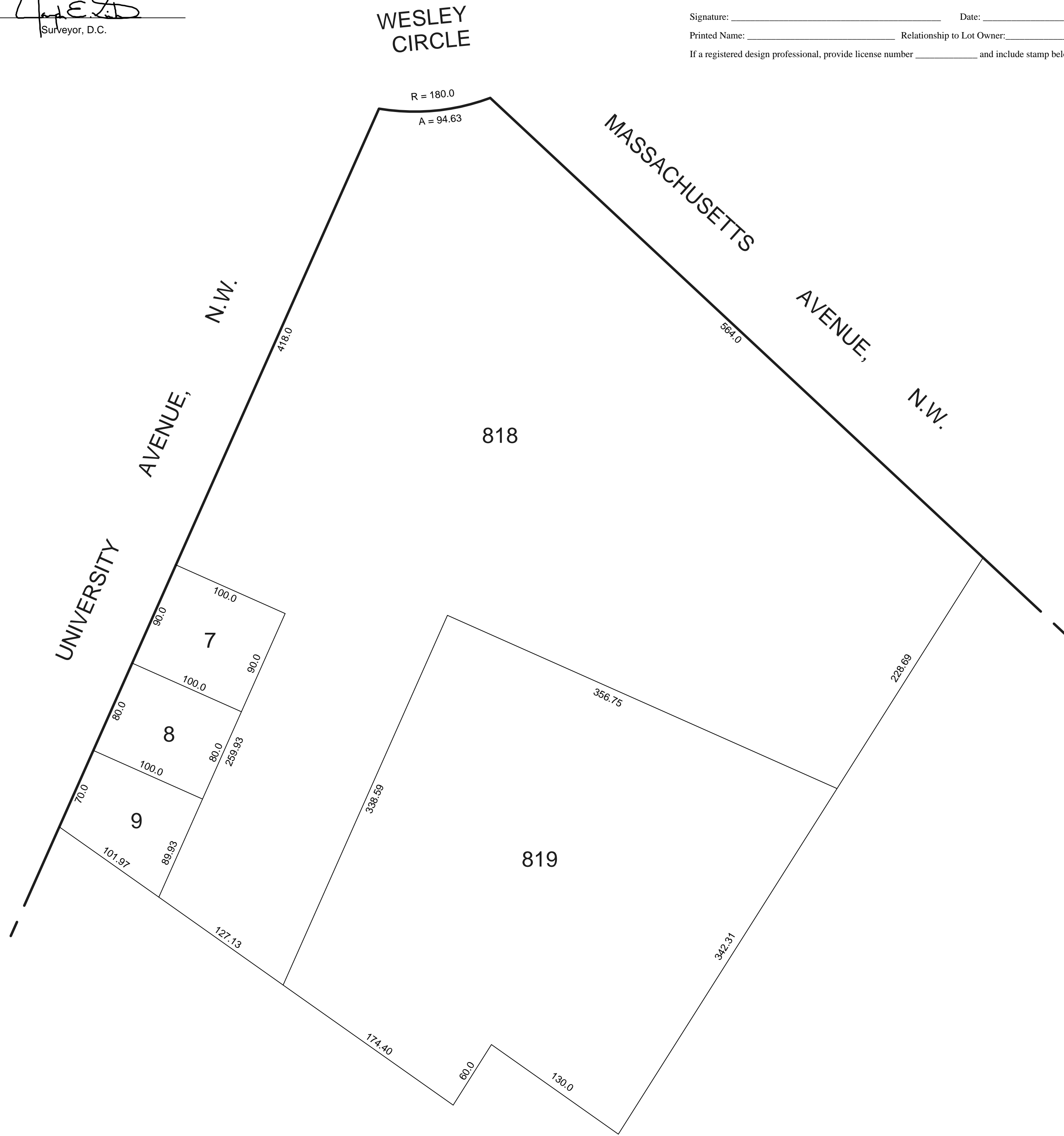
I also hereby certify that:

- 1) my depiction on this plat, as detailed above, is accurate and complete as of the date of my signature hereon;
 - 2) there is no elevation change exceeding ten feet measured between lot lines; or if so, this elevation change is depicted on a site plan submitted with the plans for this permit application;
 - 3) I ~~have~~ have not (circle one) filed a subdivision application with the Office of the Surveyor;
 - 4) I ~~have~~ have not (circle one) filed a subdivision application with the Office of Tax & Revenue; and
 - 5) if there are changes to the lot and its boundaries as shown on this plat, or to the proposed construction and plans as shown on this plat, that I shall obtain an updated plat from the Office of the Surveyor on which I will depict all existing and proposed construction and which I will then submit to the Office of the Zoning Administrator for review and approval prior to permit issuance.
- The Office of the Zoning Administrator will only accept a Building Plat issued by the Office of the Surveyor within the two years prior to the date DCRA accepts a Building Permit Application as complete. I acknowledge that any inaccuracy or errors in my depiction on this plat will subject any permit or certificate of occupancy issued in reliance on this plat to enforcement, including revocation under Sections 105.6(1) and 110.5.2 of the Building Code (Title 12A of the DCMR) as well as prosecution and penalties under Section 404 of D.C. Law 4-164 (D.C. Official Code §22-2405).

Signature: _____ Date: _____

Printed Name: _____ Relationship to Lot Owner: _____

If a registered design professional, provide license number _____ and include stamp below.



0 10 30 60 100 200
SCALE: 1:60

SR-22-00897(2021)


EXHIBIT “D”

CERTIFICATE OF NOTICE

I HEREBY CERTIFY that a copy of the Notice of Intent to File a Zoning Application for Further Processing of a Campus Plan (23-08(1)) by The Wesley Theological Seminary of the United Methodist Church (“Wesley Seminary”) was mailed to Advisory Neighborhood Commissions (“ANC”) 3D and 3E and to the owners of all property within 200 feet of the perimeter of the subject property on May 20, 2025, at least 45 calendar days prior to the filing of this application, as required by the Zoning Regulations of the District of Columbia, 11 DCMR Subtitle Z, Section 302.6.

The Wesley Seminary Thrive in Place Campus Plan (2023-2033) is the result of a community engagement process that began in 2019 and is ongoing most recently on May 15, 2023, involving the Community Liaison Committee, ANC 3D and 3E, and the broader community. In addition to numerous meetings with the community, Wesley Seminary has posted Campus Plan documents on its website for review and comment. www.wesleyseminary.edu/wesley-master-plan-updates

A copy of the notice is attached hereto.

By:  _____
John Patrick Brown, Jr., Esq.

Date: August 8, 2025

NOTICE OF INTENT TO FILE A ZONING APPLICATION
APPLICATION TO THE DISTRICT OF COLUMBIA ZONING COMMISSION FOR
APPROVAL OF A FURTHER PROCESSING APPLICATION OF AN APPROVED
CAMPUS PLAN – WESLEY SEMINARY

May 20, 2025

The Wesley Theological Seminary of the United Methodist Church (“Wesley Seminary”) gives notice of its intent to file an application for approval of a Further Processing application for its Spring Valley campus located at 4500 Massachusetts Avenue, N.W. (Square 1600, Lots 6 (Lots 818 and 819), 7, 8 and 9) (“Campus”). The Further Processing application will be filed upon Zoning Commission approval of the pending Campus Plan application, Z.C. Case No. 23-08(1).

The Campus is located in the RA-1 Zone District bounded by University Avenue, Massachusetts Avenue and the existing American University campus. The 8.78-acre Campus is currently improved with academic and administrative uses, a chapel, three student residential buildings and a surface parking lot.

Planning for the 2025 Campus Plan began in 2019 and has progressed thru 2025 with engagement with Wesley’ Community Liaison Committee, Advisory Neighborhood Commissions 3D and 3E, other neighborhood organizations and District of Columbia agencies. This process was slowed by the public health emergency, but has continued into 2025. This productive community engagement will continue as the 2025 Campus Plan advances through the final approval process and Further Processing.

The 2025 Campus Plan is a renewed commitment by Wesley Seminary, a leading national and international theological educational institution, to its Spring Valley Campus and role in Washington, D.C., regionally, nationally and internationally. This Plan will allow Wesley Seminary to “Thrive in Place” for the long-term.

The 2025 Campus Plan proposes to demolish two 1960– era dormitories (Straughn Hall and Carrol Hall) with ninety beds, and demolish the Old President’s House on University Avenue and re-landscape that area with a community playground. The existing surface parking lot (143 spaces) and adjacent one-story maintenance building will be demolished. The other existing Wesley Seminary buildings, including Kresge Hall, Trott Administration Building, Library, Chapel and New Residence Hall will remain in place as the perimeter of the existing hilltop campus. The 2025 Campus Plan will maintain and enhance the existing Open Space Green Area Buffer with the adjoining neighborhoods on University and Massachusetts Avenues. Fully 53% (205,000 square feet) of the Campus area will remain Green Open Space, including the preservation of existing trees, enhanced landscaping, sidewalk and public space improvements along University Avenue. The total campus gross floor area proposed will result in a total floor area ratio (“FAR”) of approximately 1.014, well below the maximum 1.8 FAR permitted. Approximately 300,740 square feet of gross floor area will not be developed. The 2025 Campus Plan documents are posted on Wesley Seminary’s website <https://www.wesleyseminary.edu/wesley-master-plan-updates> and will be continuously updated.

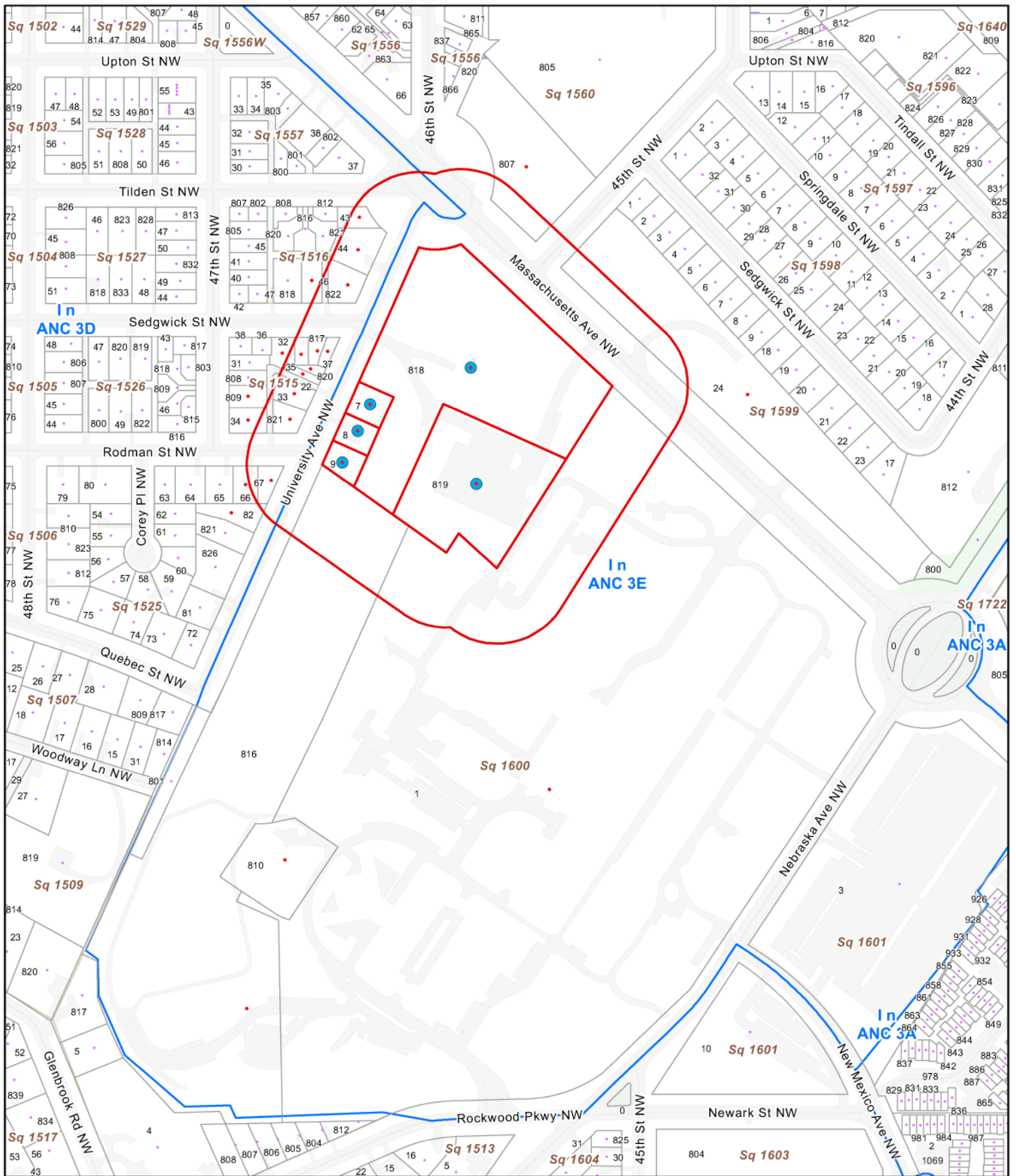
The subject of the Further Processing Application will be a new dormitory (and related campus improvements) with approximately 659 beds and 264 underground parking spaces (“New Dorm”) to be constructed by Landmark Properties, a leading nationwide student housing provider, under a long-term ground lease with Wesley Seminary. The new Dorm will be seven stories with a gross floor area of 282,061 square feet. It will be occupied exclusively by Wesley Seminary and American University students, faculty and staff. The New Dorm will be subject to the Inclusionary Zoning off-site requirements pursuant to newly enacted Subtitle C, §1006.10. Specifically, Wesley proposes to establish and fund a Ward 3 Inclusionary Zoning Revolving Fund to be administered by Local Initiatives Support Corporation, an experienced nonprofit organization with expertise in financing affordable housing for the purpose of creating affordable housing off-site in Ward 3.

Wesley Seminary will continue its community engagement, including future meetings with ANC 3D and ANC 3E, the Community Liaison Committee and other groups. Wesley Seminary is available to discuss the proposed 2025 Campus Plan with all interested groups and individuals.

The Further Processing application will be filed with the District of Columbia Zoning Commission under Subtitle X, Chapter 1 and Subtitle Z, Section 302 of the District of Columbia Zoning Regulations, 11 DCMR (effective September 6, 2016, as amended), not less than forty-five (45) days from the date of this Notice, which is given pursuant to Subtitle Z, Section 302.6 of the Zoning Regulations.

Wesley Seminary’s land use counsel is Greenstein DeLorme & Luchs, P.C. If you require additional information regarding this proposed Further Processing application, please contact Patrick Brown at 202-452-1400 or jpb@gdllaw.com.

EXHIBIT “E”



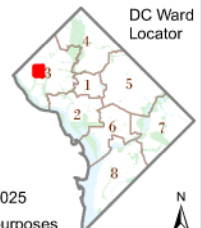
MyTax DC Radius Map Request

Subject Property ID's
Square 1600 Lots 7, 8, 9, 818, 819

- Subject Properties
- Radius
- Ownership Lots
- DC Squares
- ANC Boundary



DC Office of Tax and Revenue
 Real Property Assessment Division
 Maps and Titles Assessment Roll
 Geographic Information Systems



1:4,085
 0 50
 Feet

Print Date: 2/3/2025
 For general planning purposes

LINSON, MAYA
440 L ST NW # BW906
WASHINGTON DC 20001-2560

JAGANNATHAN, NATALIA
4615 RODMAN ST NW
WASHINGTON DC 20016-3232

WESLEY THEOLOGICAL SEMINARY
4500 MASS AVE NW
WASHINGTON DC 20016-5632

AMERICAN UNIVERSITY
4400 MASSACHUSETTS AVE NW
WASHINGTON DC 20016-8002

RUIZ, ESTHER P
3809 47TH ST NW
WASHINGTON DC 20016-5611

WESLEY THEOLOGICAL SEMINARY OF
4500 MASS AVE NW
WASHINGTON DC 20016-5632

AMERICAN UNIVERSITY
4400 MASSACHUSETTS AVE NW
WASHINGTON DC 20016-8002

WEE, ASBJORN
4612 SEDGWICK ST NW
WASHINGTON DC 20016-5614

WESLEY THEOLOGICAL SEMINARY OF
4500 MASS AVE NW
WASHINGTON DC 20016-5632

AMERICAN UNIVERSITY
4400 MASSACHUSETTS AVE NW
WASHINGTON DC 20016-8002

WEE, CAROLINE
4612 SEDGWICK ST NW
WASHINGTON DC 20016-5614

GEORGE B KAISER TRUSTEE
4615 SEDGWICK ST NW
WASHINGTON DC 20016-5615

BAHMAN LARIZADEH TRUSTEES
10 WESLEY CIR NW
WASHINGTON DC 20016-5605

LEHNHARD, MARY N
4601 RODMAN ST NW
WASHINGTON DC 20016-3232

PATRICIA SAUNDERS
4616 SEDGWICK ST NW
WASHINGTON DC 20016-5614

ROBERT C NURICK TRUSTEE
6 WESLEY CIR NW
WASHINGTON DC 20016-5605

SALMAN, KAREEM
4610 RODMAN ST NW
WASHINGTON DC 20016-3233

WESLEY THEOLOGICAL SEMINARY OF
4500 MASS AVE NW
WASHINGTON DC 20016-5632

ROBERT R SCHOLZ TRUSTEE
3900 UNIVERSITY AVE NW
WASHINGTON DC 20016-5622

BAKER, DAVID B
3730 UNIVERSITY AVE NW
WASHINGTON DC 20016-5618

WESLEY THE THEOLOGICAL SEMINARY
4500 MASS AVE NW
WASHINGTON DC 20016-5632

WEE, CAROLINE
4612 SEDGWICK ST NW
WASHINGTON DC 20016-5614

JEFFREY M PURYEAR TRUSTEE
3724 UNIVERSITY AVE NW
WASHINGTON DC 20016-5618

THORNTON, HUGUETTE
4620 SEDGWICK ST NW
WASHINGTON DC 20016-5614

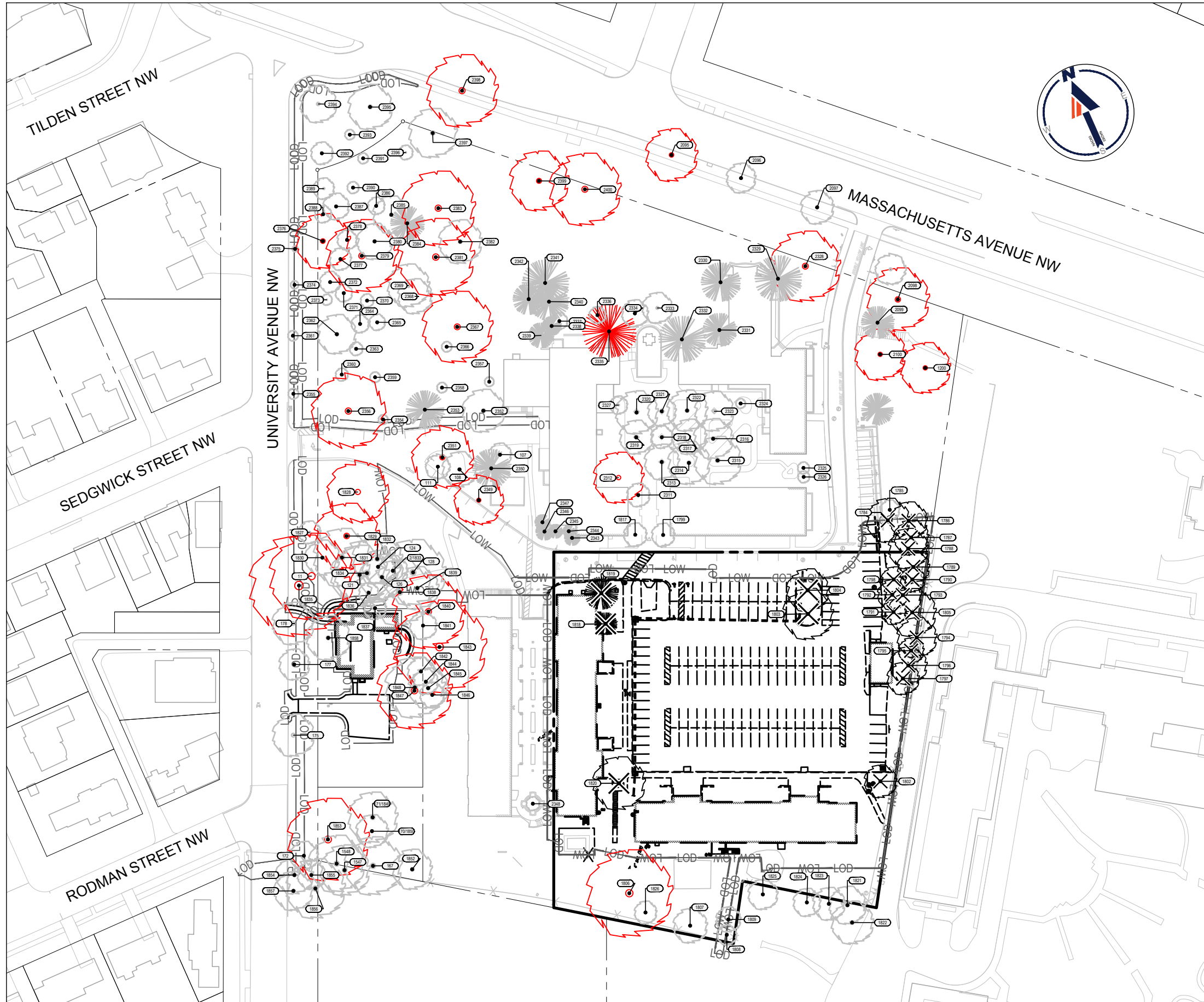
AMERICAN UNIVERSITY
4400 MASSACHUSETTS AVE NW
WASHINGTON DC 20016-8002

DECARLO, CESARE
3808 UNIVERSITY AVE NW
WASHINGTON DC 20016-5620

AMERICAN UNIVERSITY
4400 MASSACHUSETTS AVE NW
WASHINGTON DC 20016-8002





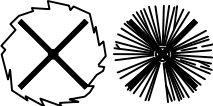


EXHIBIT “F”

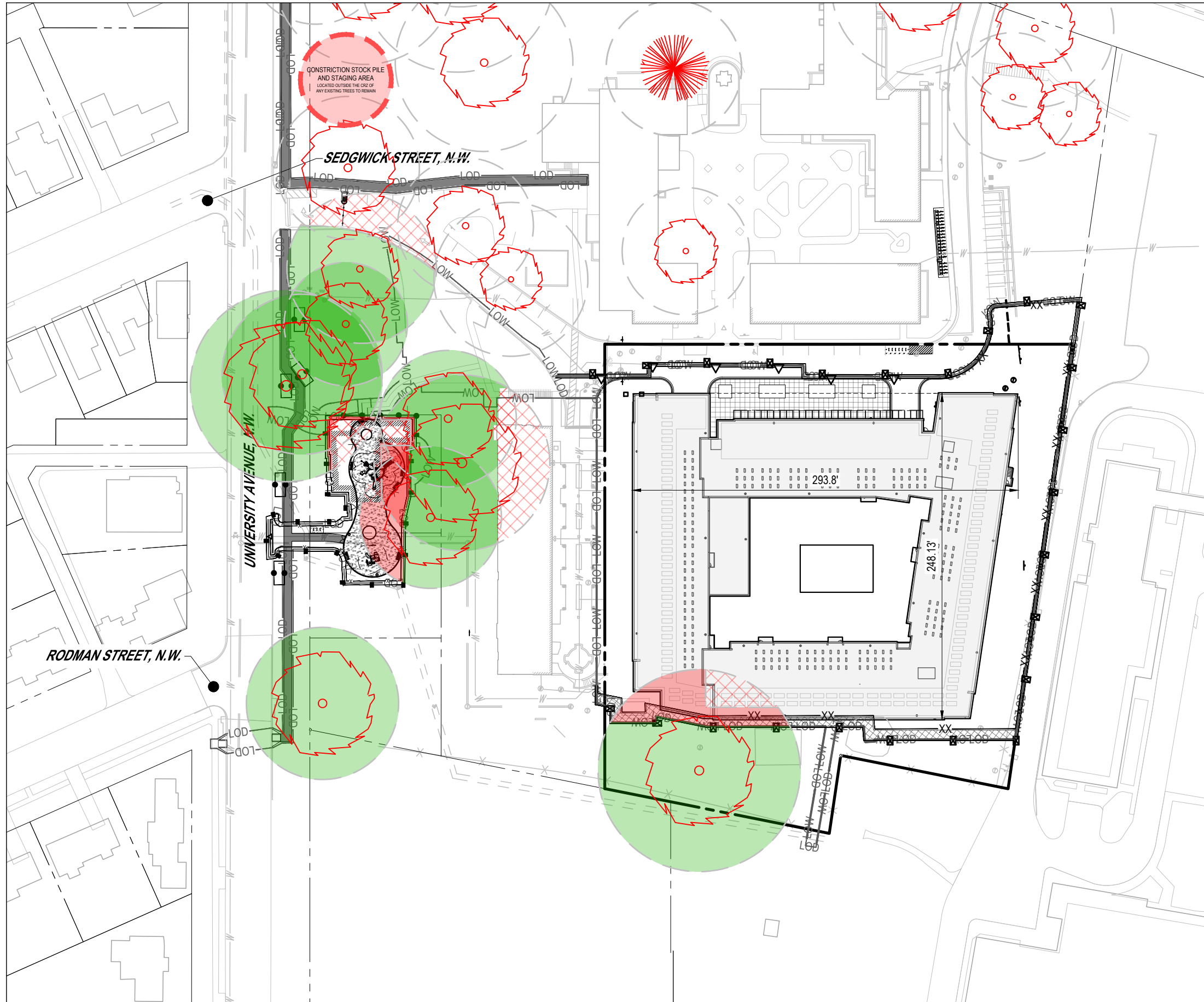


INVENTORY PLAN NARRATIVE

THERE ARE NUMEROUS SPECIAL TREES LOCATED AROUND THE WESLEY THEOLOGICAL SEMINARY CAMPUS. THERE ARE (27) HERITAGE TREES THAT WILL BE PRESERVED ON THROUGH THIS PROJECT. THE MAJORITY OF THE EXISTING VEGETATION CONSISTS OF LARGE HEALTHY NATIVE TREES. THE TREES OFFER MODERATE BIODIVERSITY AND SHOULD BE CONSIDERED A MODERATE TO WELL AGED GROUPING OF TREES.

INVENTORY PLAN LEGEND

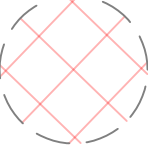
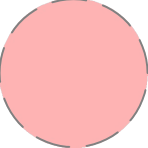



-  EXISTING DRIP LINE TO REMAIN
-  EXISTING TREES TO REMAIN
-  EXISTING TREES TO BE REMOVED
-  EXISTING HERITAGE TREES TO REMAIN
-  TREE TAG NUMBER

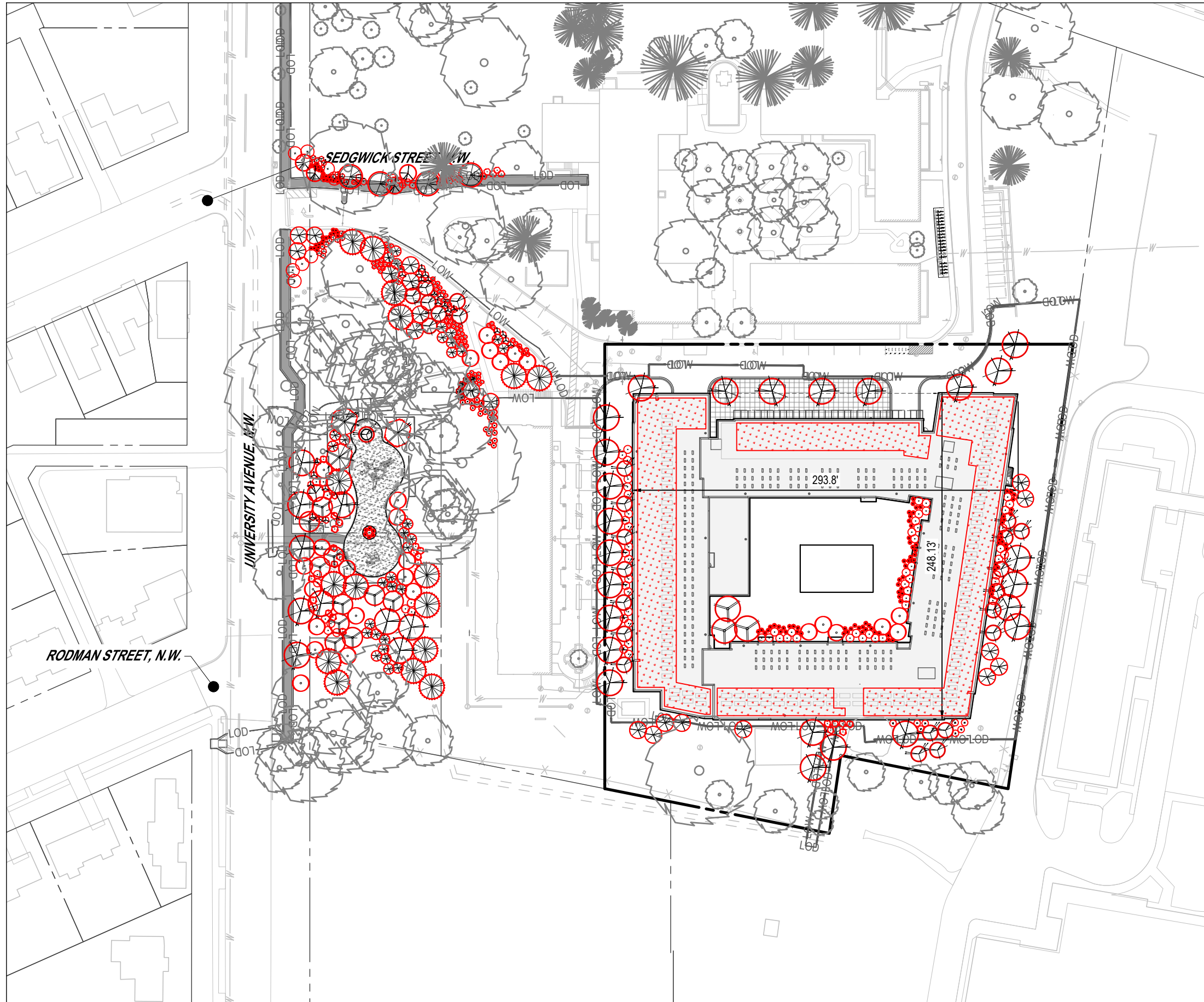


PRESERVATION PLAN NARRATIVE

THE HERITAGE TREES ON SITE WILL BE PROTECTED THROUGH THE END OF CONSTRUCTION BY VARIOUS METHODS. THE PROJECT LIMITS OF DISTURBANCE AND CONSTRUCTION STRATEGY HAS BEEN REVISED TO REDUCE THE IMPACT ON THE SURROUNDING HERITAGE TREES. THE TREES WILL BE PROTECTED USING SELECTIVE ROOT PRUNING, SUPER SILT FENCE, TREE PROTECTION FENCE, ROOT PROTECTION MATTING, MULCHING.

HERITAGE TREES PRESERVATION PLAN LEGEND

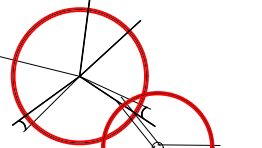
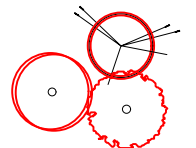




-  CRITICAL ROOT ZONE EXCLUDED DUE TO EXISTING SITE CONSTRAINTS
-  CRITICAL ROOT ZONE IMPACTED BY NEW CONSTRUCTION ACTIVITY
-  CRITICAL ROOT ZONE TO BE MAINTAINED, NOT EFFECTED BY CONSTRUCTION ACTIVITY
-  CRITICAL ROOT ZONE STRUCTURAL ROOT ZONE
-  STOCKPILE AND STAGING AREA

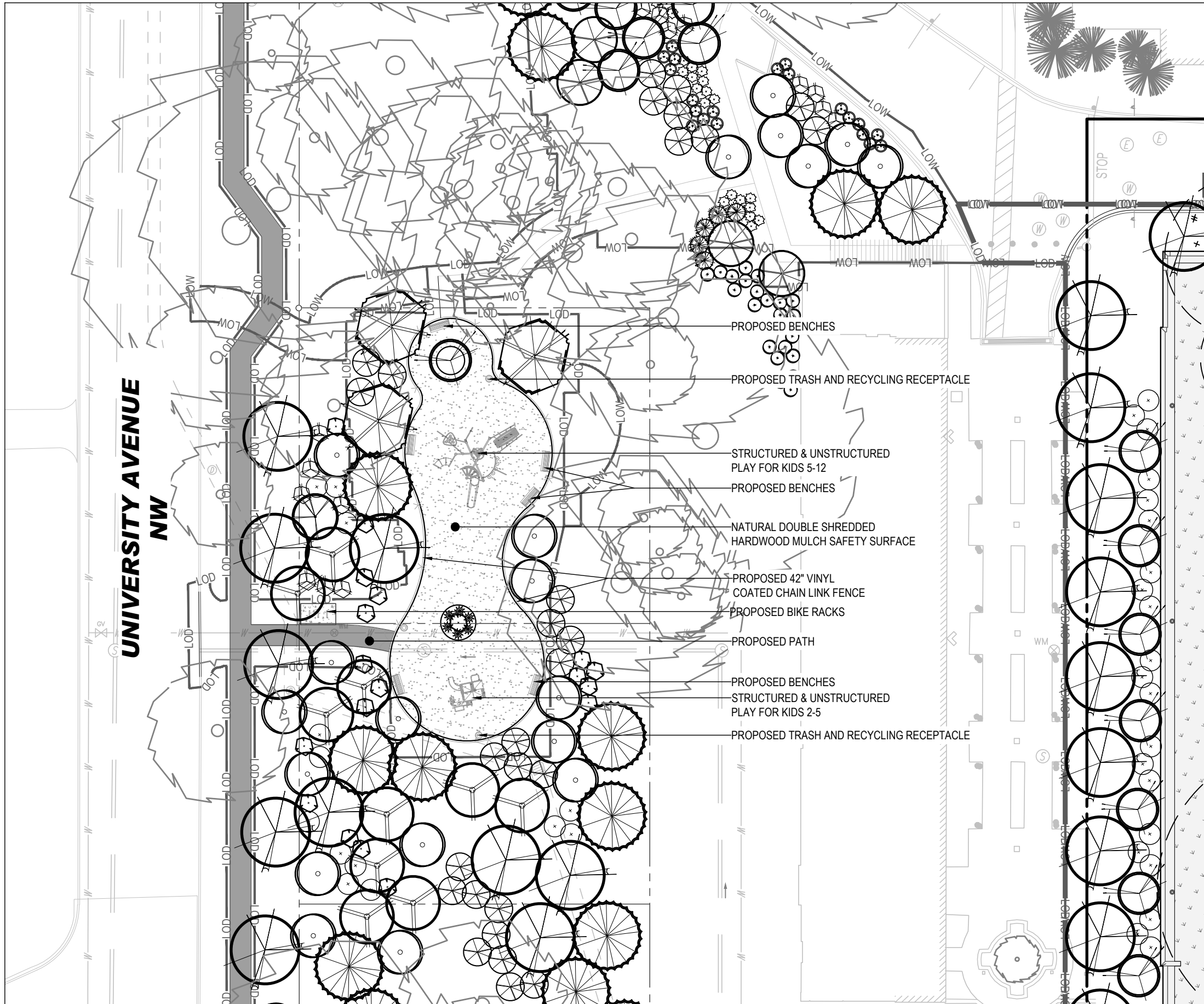


LANDSCAPE PLAN NARRATIVE

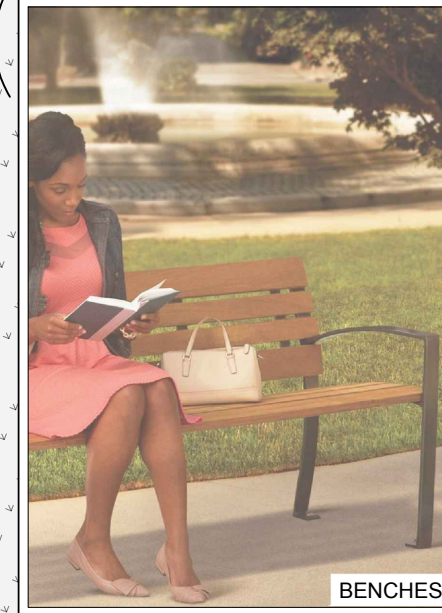
THE PROPOSED LANDSCAPING WILL BE PLANTED IN NATURALISTIC SCHEME TO SCREEN THE PROPOSED DORM BUILDING. THE PROPOSED PLANTS WILL LINE THE DRIVEWAY ENTRANCE TO HELP SCREEN UTILITIES AND BEAUTIFY THE ACCESS ROAD. PLANTS ALONG UNIVERSITY AVE WILL BE PLANTED TO CREATE PRIVACY AND ENCLOSE THE PROPOSED PLAYGROUND. THE MAJORITY OF THE PLANTS PROPOSED WILL BE NATIVE VARIETIES THAT WILL ADD AN ECOLOGICAL BENEFIT AND OFFER PROVIDE YEAR ROUND COLOR/INTEREST.

LANDSCAPE PLAN LEGEND

-  SHADE TREES
-  ORNAMENTAL TREES
-  EVERGREEN TREES
-  DECIDUOUS SHRUBS
-  EVERGREEN SHRUBS
-  APPROXIMATE SEDUM GREEN ROOF AREA

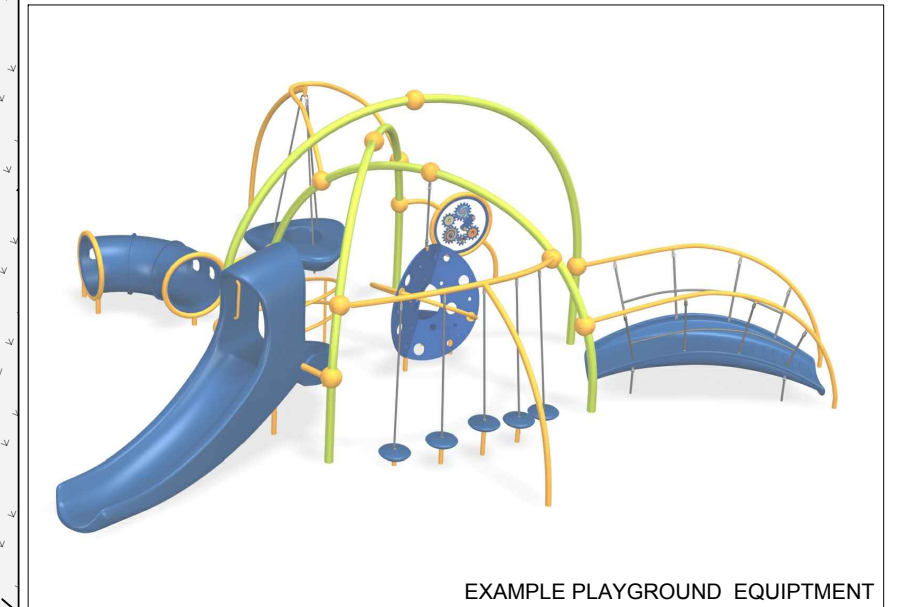


42" TALL PERIMETER FENCE

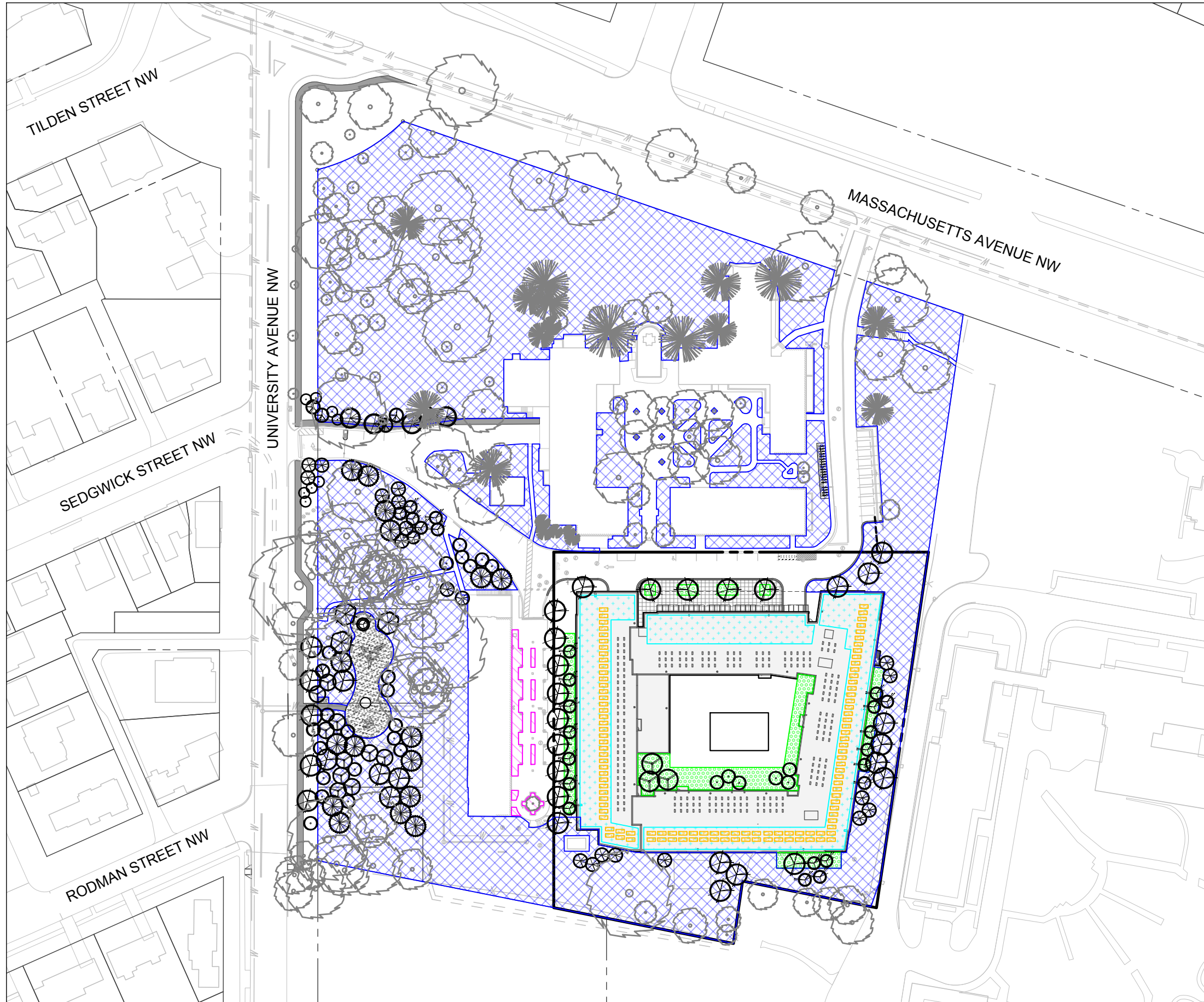


BENCHES

TRASH/RECYCLING RECEPTICAL





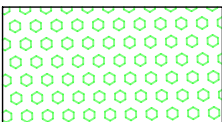
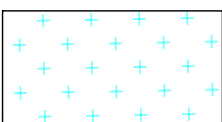

EXAMPLE PLAYGROUND EQUIPMENT

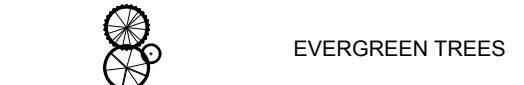
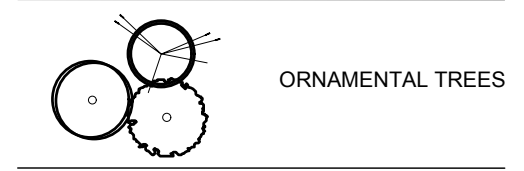
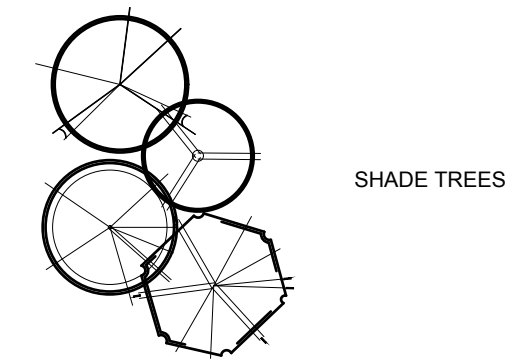


GREEN AREA RATIO NARRATIVE

THE MINIMUM GREEN AREA RATIO SCORE IN THIS ZONE (RA-1) IS 0.40. THE MINIMUM SCORE WILL BE ACHIEVED BY PROVIDING A COMBINATION OF A1 & A2 SOILS AROUND THE CAMPUS WHICH HAS EXTENSIVE LANDSCAPED AREAS CONTAINING EXISTING TREES. ADDITIONAL A3 BIORETENTION FACILITIES AND C2 GREEN ROOFS WITH 8" OF MEDIA WILL BE PROVIDED. LASTLY, ALL HERITAGE TREE AND THE MAJORITY OF SPECIAL TREES WILL BE PRESERVED AND COUNTED TOWARD AS B5 - B8 PRESERVATION OF EXISTING VEGETATION. **THIS COMBINATION OF GREEN AREA RATIO ELEMENTS PROVIDES A ±0.600 GAR SCORE MINIMUM.**

GREEN AREA RATIO LEGEND

-  A1 - SOILS LESS THAN 24"
-  A2 - SOILS GREATER THAN 24"
-  A3 BIORETENTION FACILITY
-  C2 - GREEN ROOF GREATER THAN 8" AREA APPROXIMATELY SHOWN
-  E2 - RENEWABLE ENERGY GENERATION SOLAR PANELS APPROXIMATELY SHOWN



Green Area Ratio Scoresheet					
Address 4500 Massachusetts Ave NW		Square	Lot	Zone District	
Other 4/16/2025		1600	6, 7, 8, & 9	RA-1	
Lot size (enter this value first) *		Lot area (sf)	Minimum Score	Multiplier	GAR Score
		381,878	0.40	SCORE:	0.600
Landscape Elements					
A Landscaped areas (select one of the following for each area)					
1	Landscaped areas with a soil depth < 24"	square feet 1,600	0.30		480.0
2	Landscaped areas with a soil depth ≥ 24"	square feet 155,000	0.60		93,000.0
3	Bioretention facilities	square feet 8,500	0.40		3,400.0
B Plantings (credit for plants in landscaped areas from Section A)					
1	Groundcovers, or other plants < 2' height	square feet	0.20	Native Bonus square feet	-
2	Plants ≥ 2' height at maturity - calculated at 9-sf per plant	# of plants 250	2250	0.30	# of plants 125
3	New trees with less than 40-foot canopy spread - calculated at 50 sq ft per tree	# of trees 50	2500	0.50	# of trees 33
4	New trees with 40-foot or greater canopy spread - calculated at 250 sq ft per tree	# of trees 50	12500	0.60	# of trees 33
5	Preservation of existing tree 6" to 12" DBH - calculated at 250 sq ft per tree	# of trees 30	7500	0.70	# of trees 15
6	Preservation of existing tree 12" to 18" DBH - calculated at 600 sq ft per tree	# of trees 15	9000	0.70	# of trees 10
7	Preservation of existing trees 18" to 24" DBH - calculated at 1300 sq ft per tree	# of trees 15	19500	0.70	# of trees 10
8	Preservation of existing trees 24" DBH or greater - calculated at 2000 sq ft per tree	# of trees 45	90000	0.80	# of trees 25
9	Vegetated wall, plantings on a vertical surface	square feet	0.60	square feet	-
C Vegetated or "green" roofs					
1	Over at least 2" and less than 8" of growth medium	square feet	0.60	square feet	-
2	Over at least 8" of growth medium	square feet 20,000	0.80	square feet	16,000.0
D Permeable Paving***					
1	Permeable paving over 6" to 24" of soil or gravel	square feet	0.40		-
2	Permeable paving over at least 24" of soil or gravel	square feet	0.50		-
E Other					
1	Enhanced tree growth systems***	square feet	0.40		-
2	Renewable energy generation	square feet 2,800	0.50		1,400.0
3	Approved water features	square feet	0.20		-
F Bonuses					
		sub-total of sq ft = 331,150			
1	Native plant species	square feet 83,875	0.10		8,387.5
2	Landscaping in food cultivation	square feet	0.10		-
3	Harvested stormwater irrigation	square feet	0.10		-
Green Area Ratio numerator =					229,293
*** Permeable paving and structural soil together may not qualify for more than one third of the Green Area Ratio score.					
Total square footage of all permeable paving and enhanced tree growth.					

GREEN AREA RATIO Worksheet*			
		Quantity of GAR Features per Submitted Sheet	
		GAR Plan	TOTAL
A1	square feet	1,600	1,600
A2	square feet	140,000	140,000
A3	square feet	9,000	9,000
B1	square feet		0
B2	Total for B2	250	250
B3	# of trees	50	50
B4	# of trees	50	50
B5	# of trees	30	30
B6	# of trees	15	15
B7	# of trees	15	15
B8	# of trees	45	45
B9	square feet		0
C1	square feet		0
C2	square feet	20,000	20,000
D1	square feet		0
D2	square feet		0
E1	square feet		0
E2	square feet	2,800	2,800
E3	square feet		0
F1	square feet		0
F2	square feet		0
F3	square feet		0
* See Green Area Ratio Scoresheet for category definitions			
** Enter totals on the Green Area Ratio Scoresheet			

NOTE: 76 SPECIAL TREES AND 27 HERITAGE TREES PRESERVED ON SITE.

EXHIBIT “G”

BUILDING ELEVATIONS



EAST ELEVATION



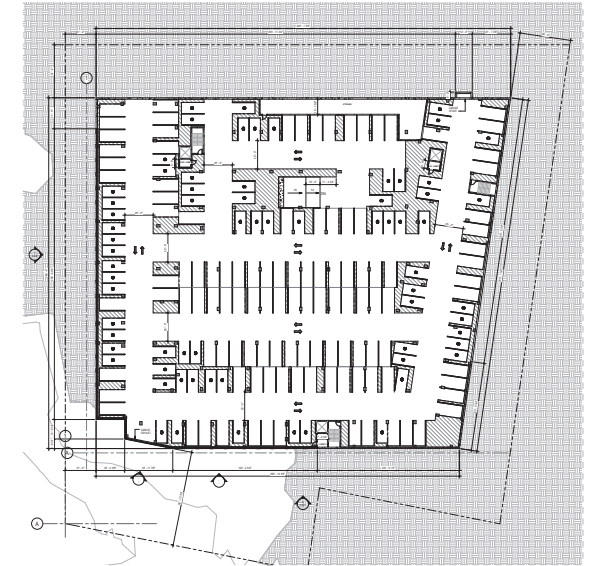
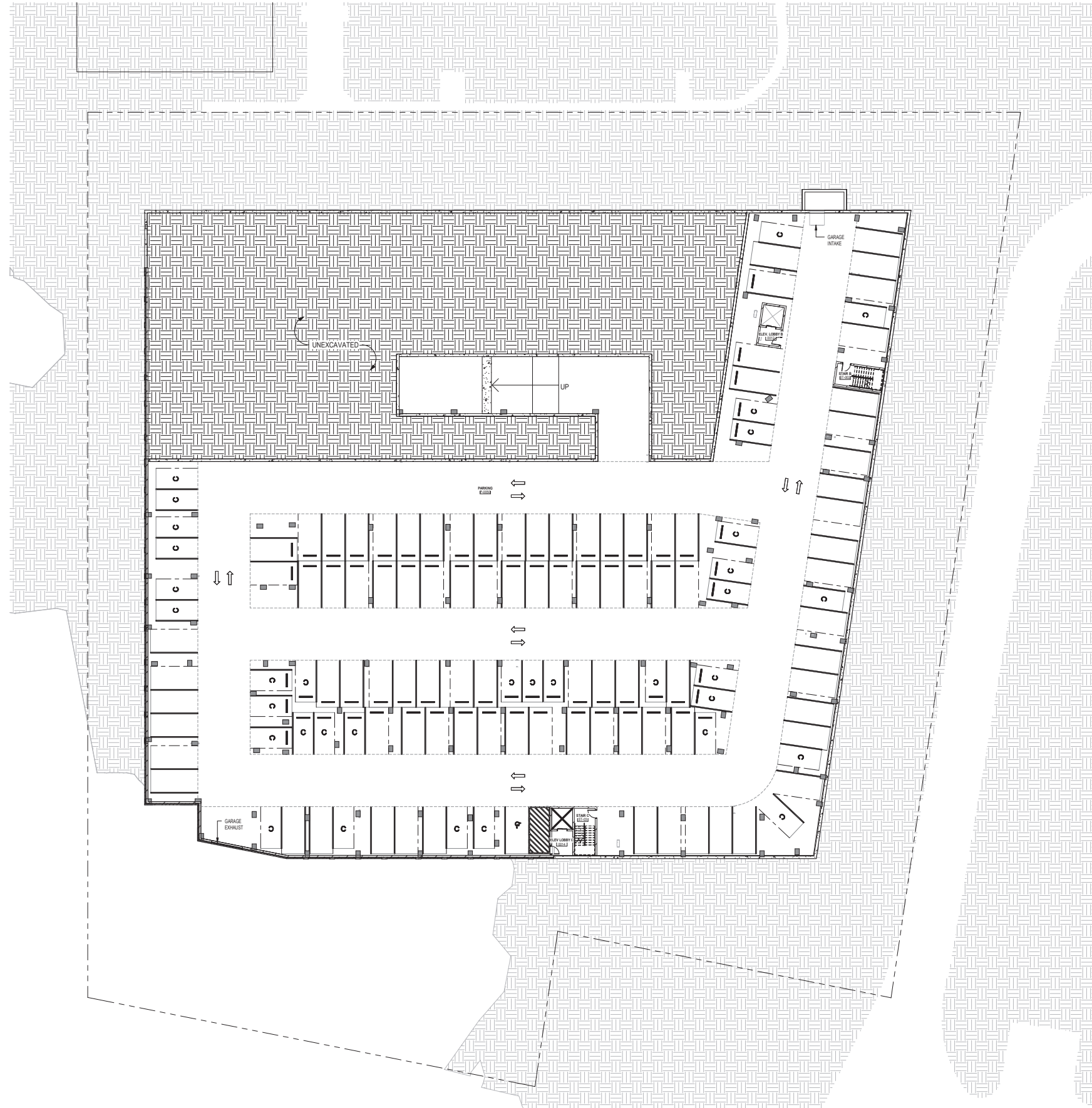
SOUTH ELEVATION

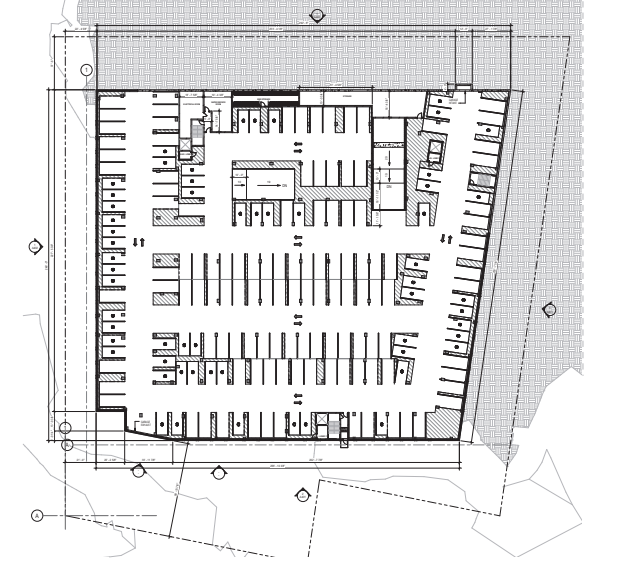
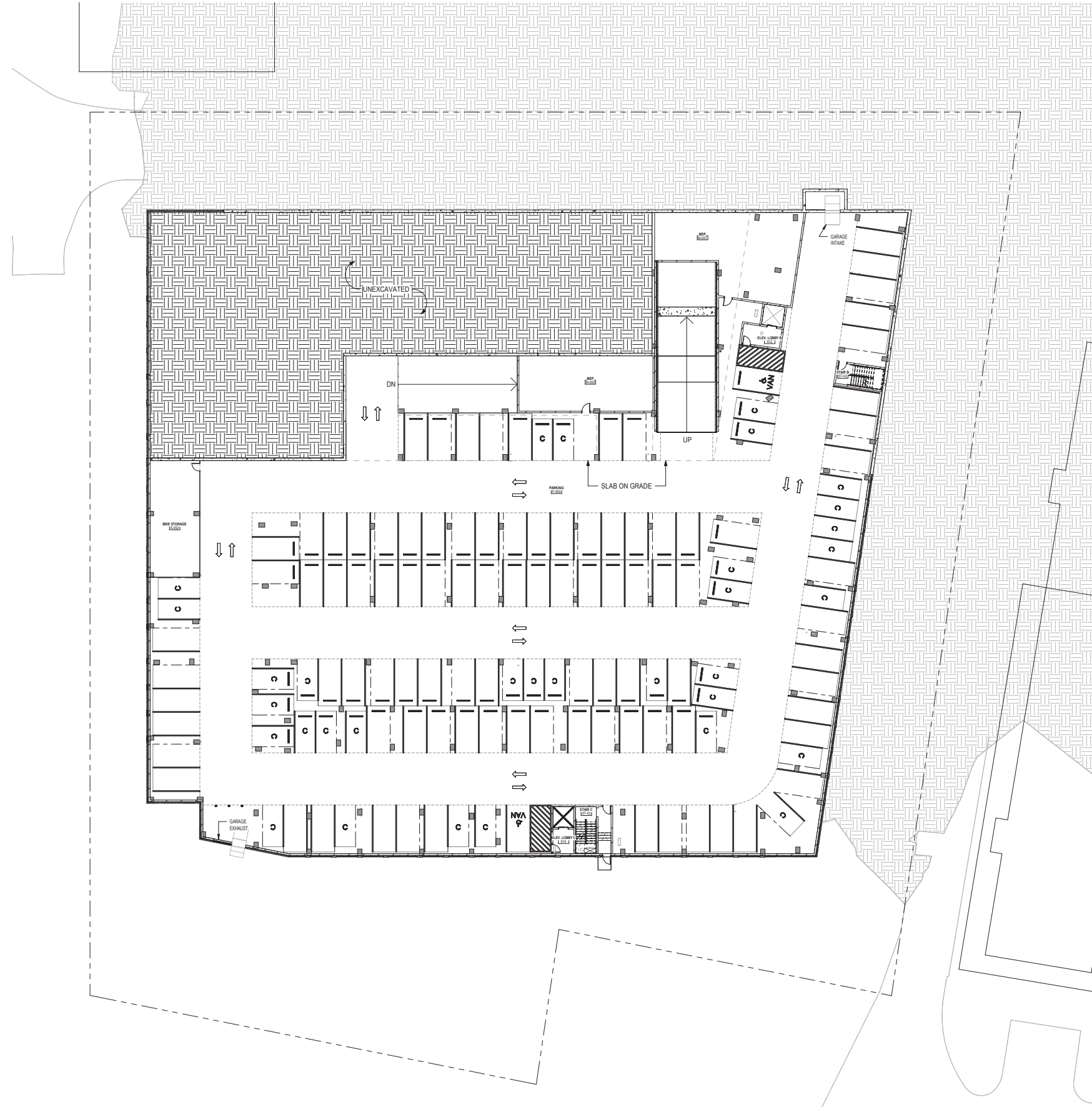


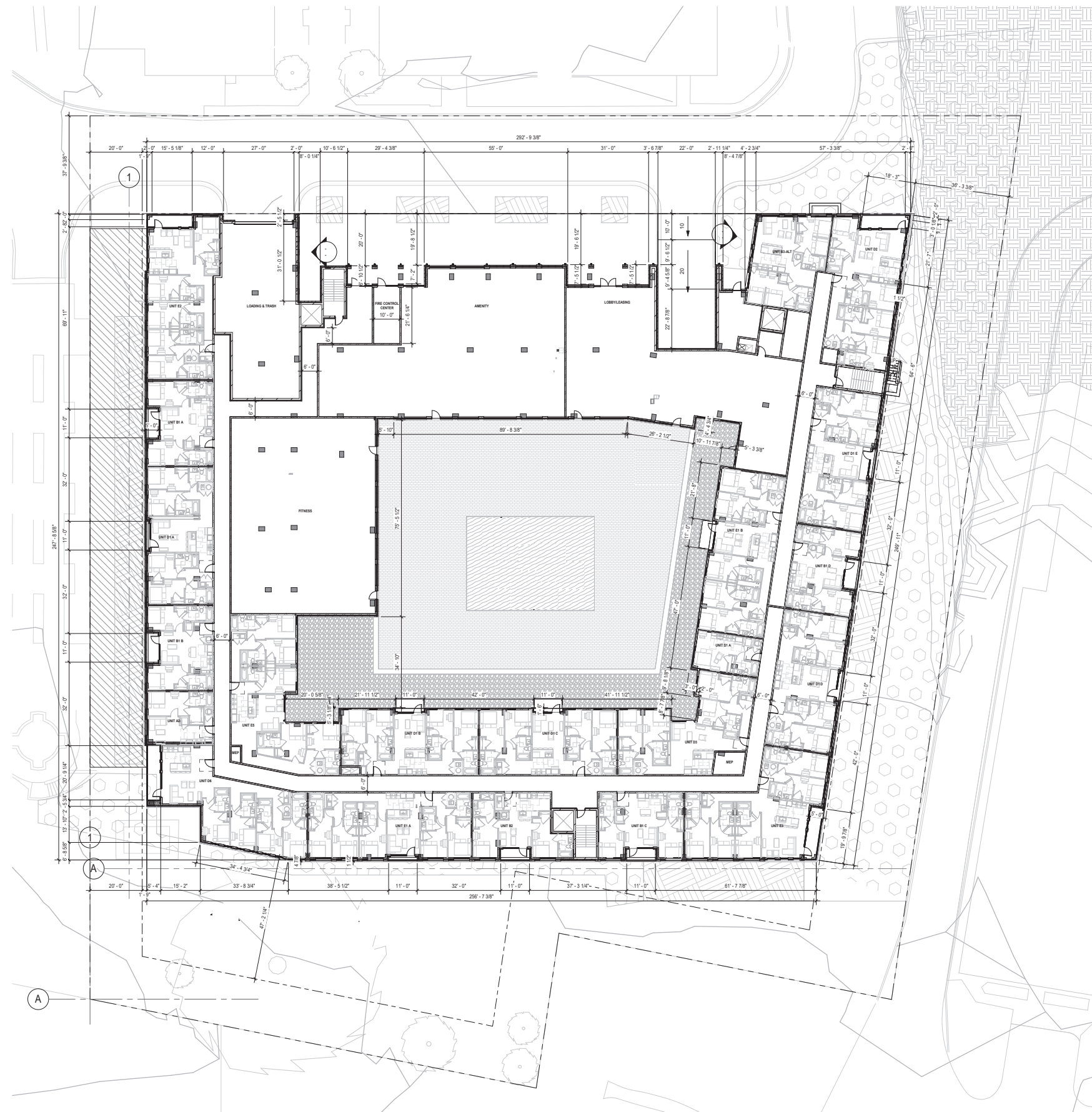
NORTH ELEVATION

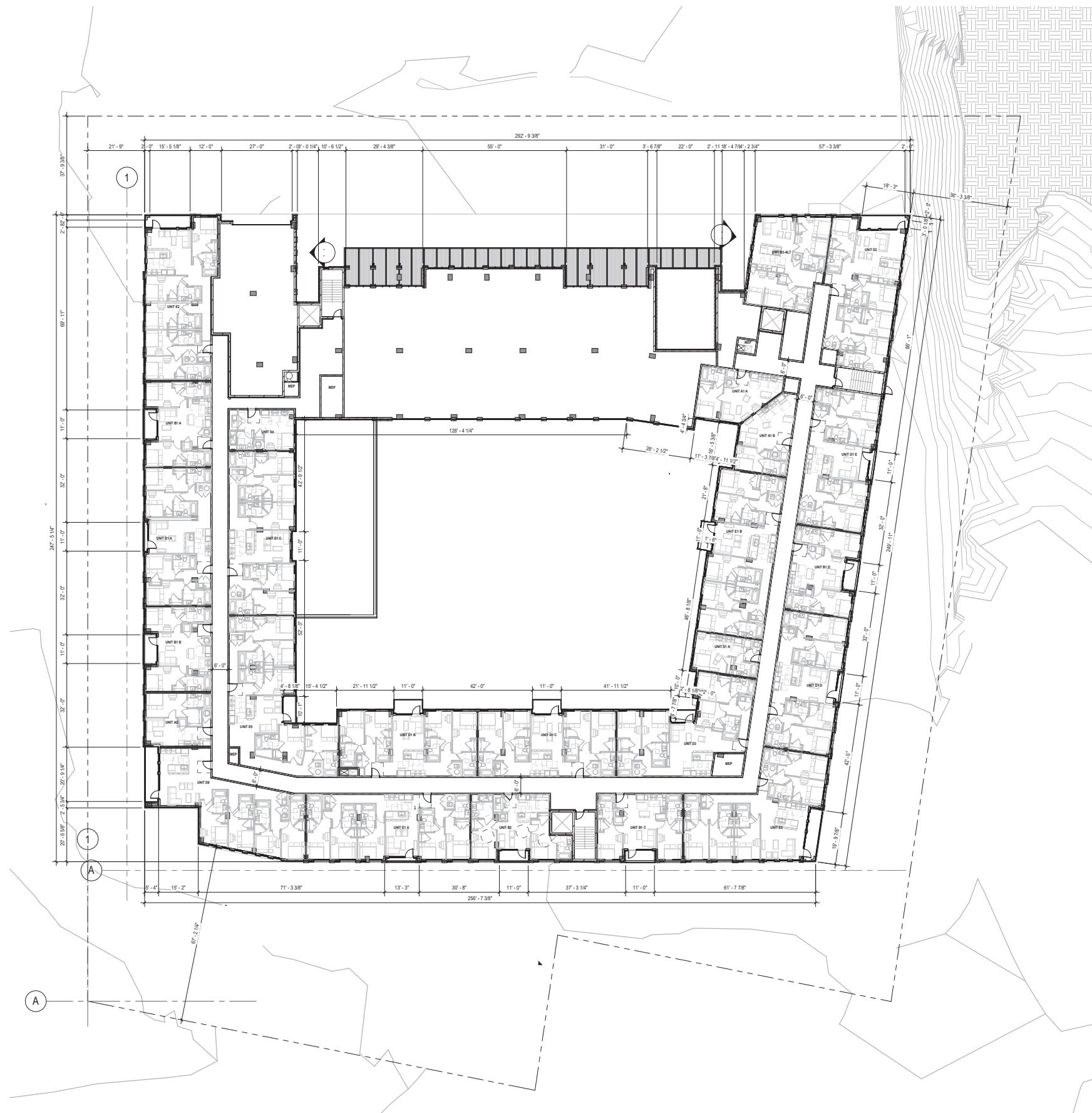


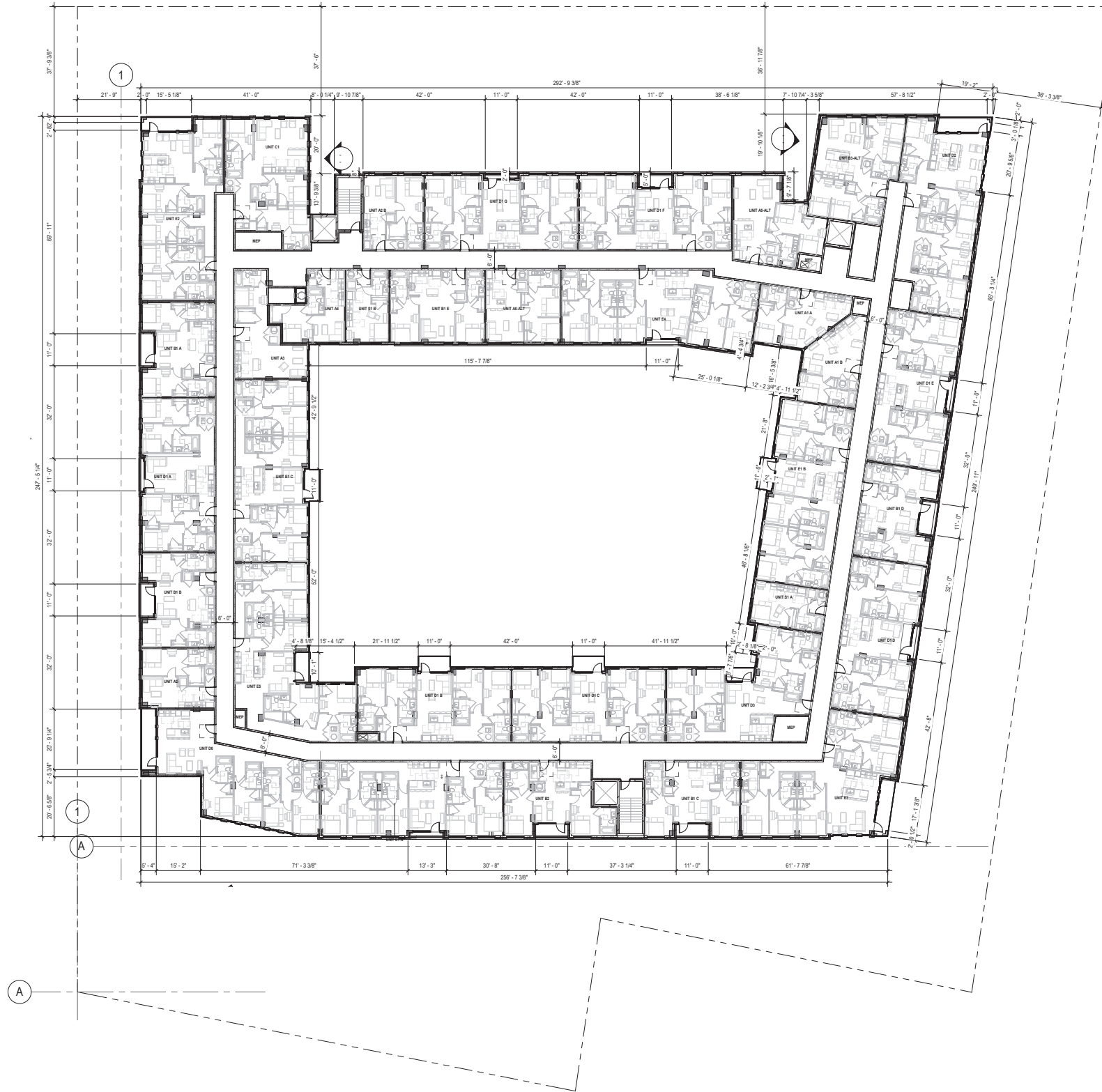
WEST ELEVATION

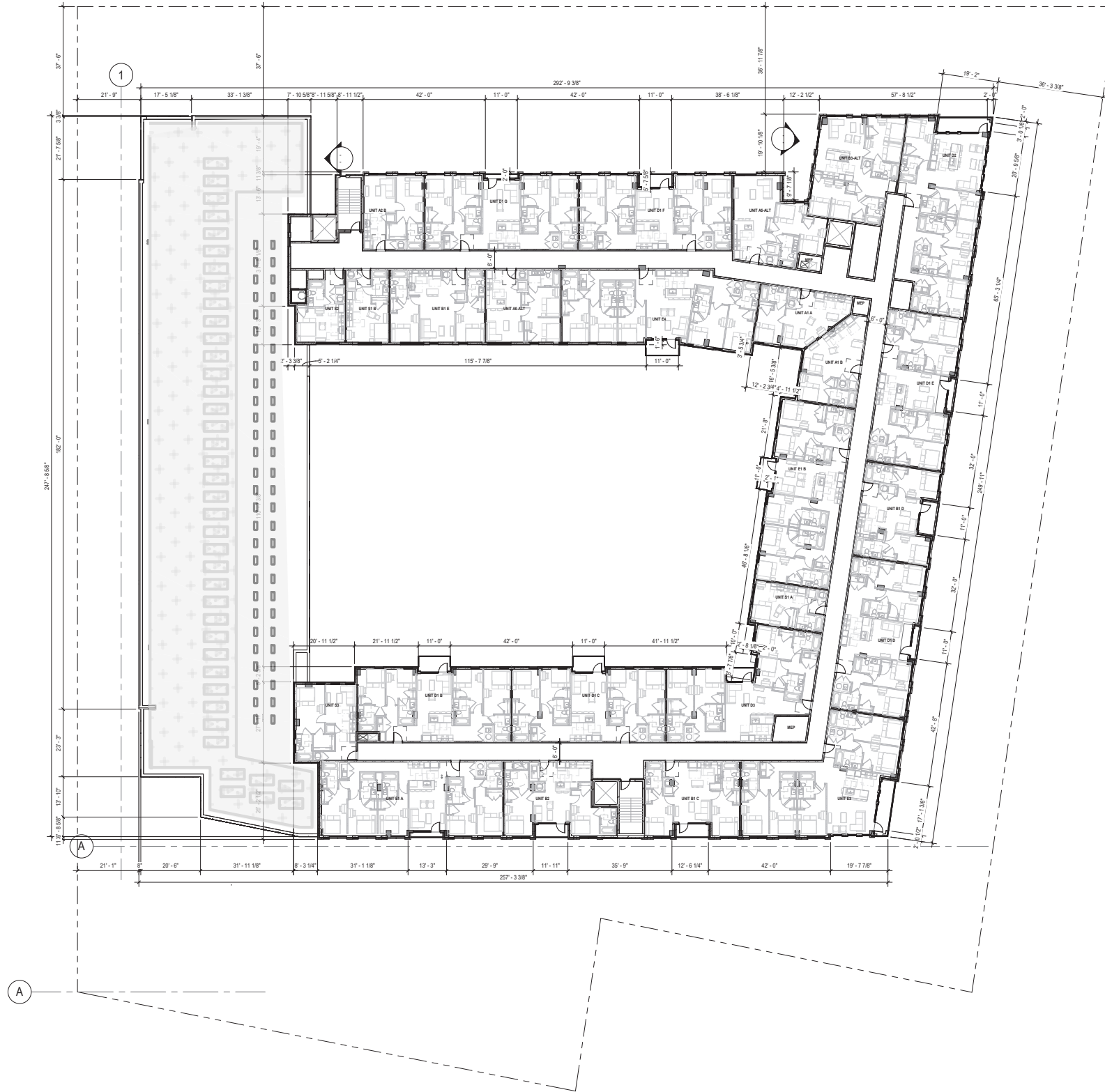




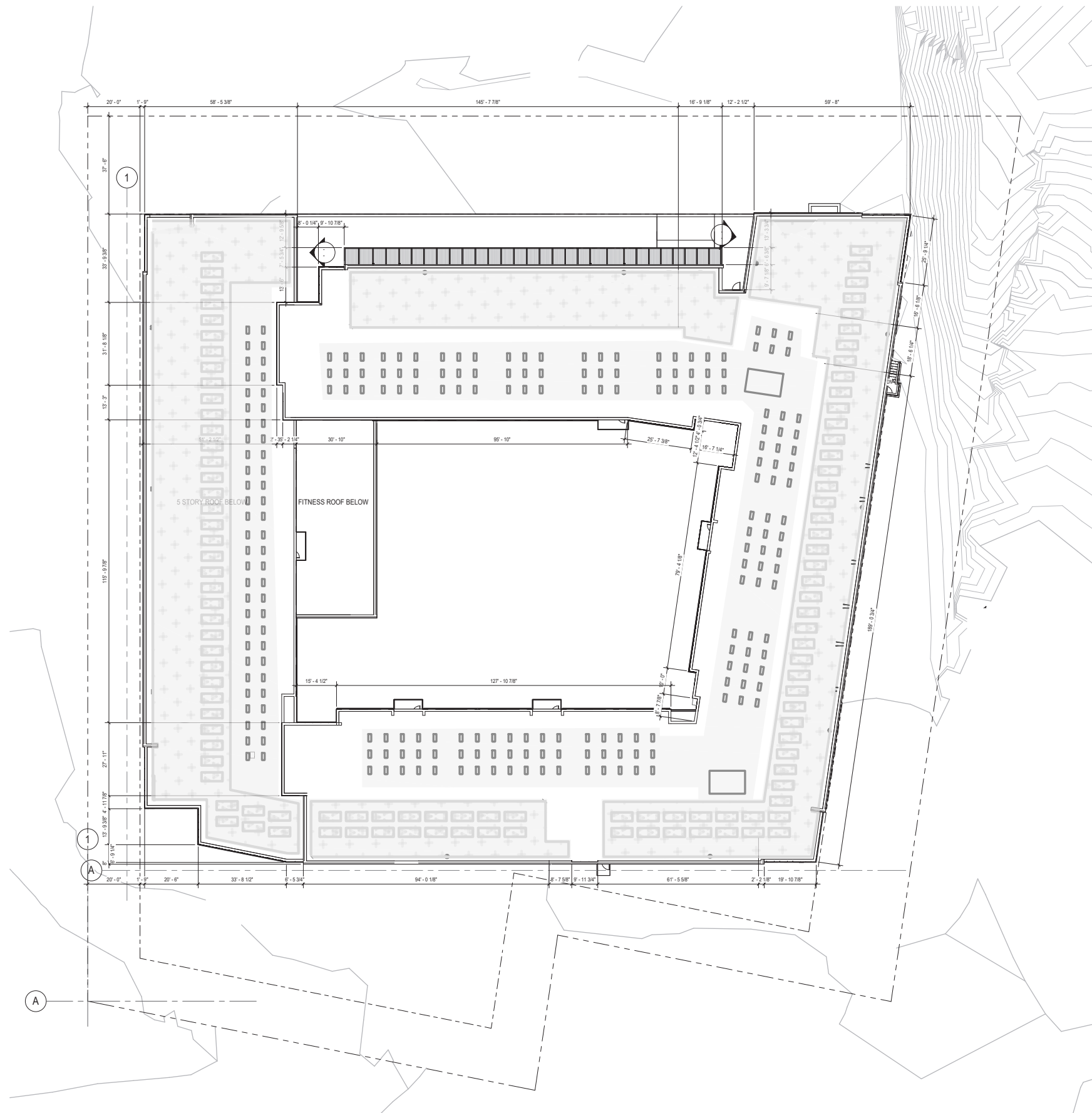








ROOF PLAN



SITE SECTIONS

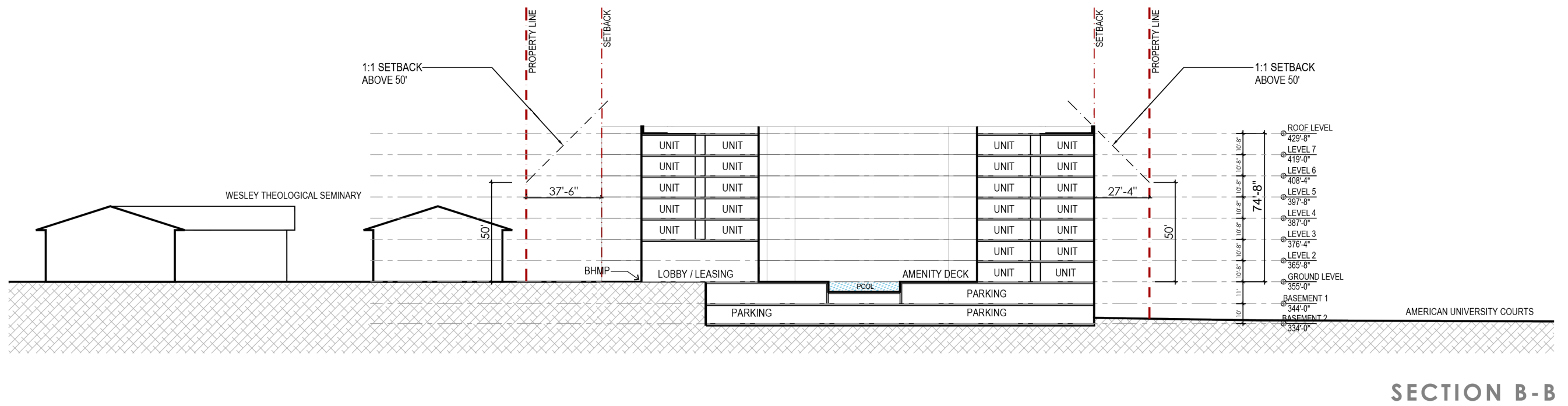
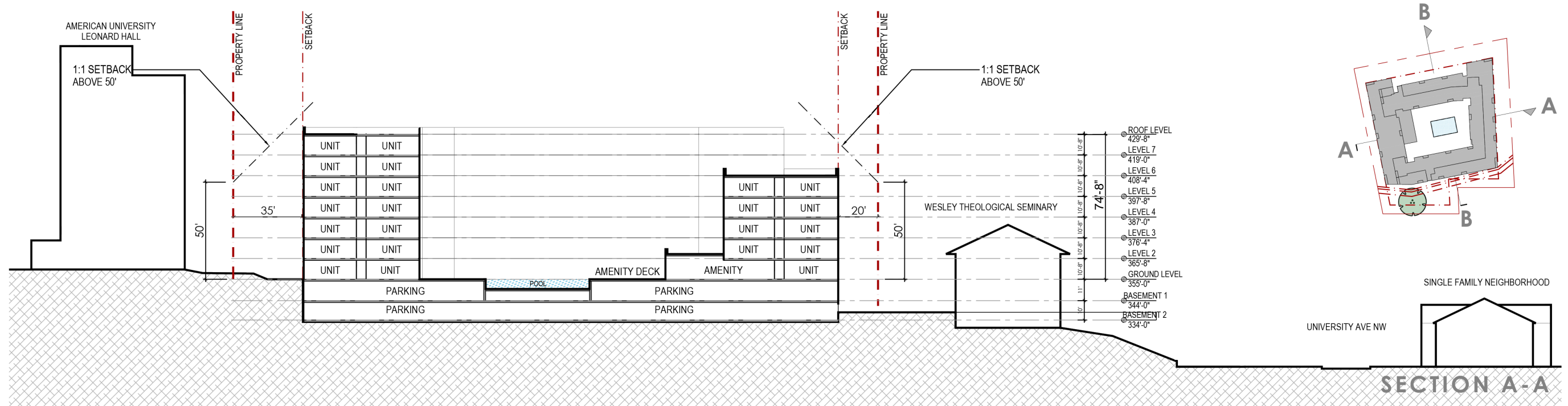


EXHIBIT “H”

View from Massachusetts Ave NW
Summer









View from University Ave NW
Winter



View from University Ave NW
Summer



View from University Ave NW
Winter



View from University Ave NW
Winter



View from Wesley Circle NW
Summer



View from Wesley Circle NW
Winter



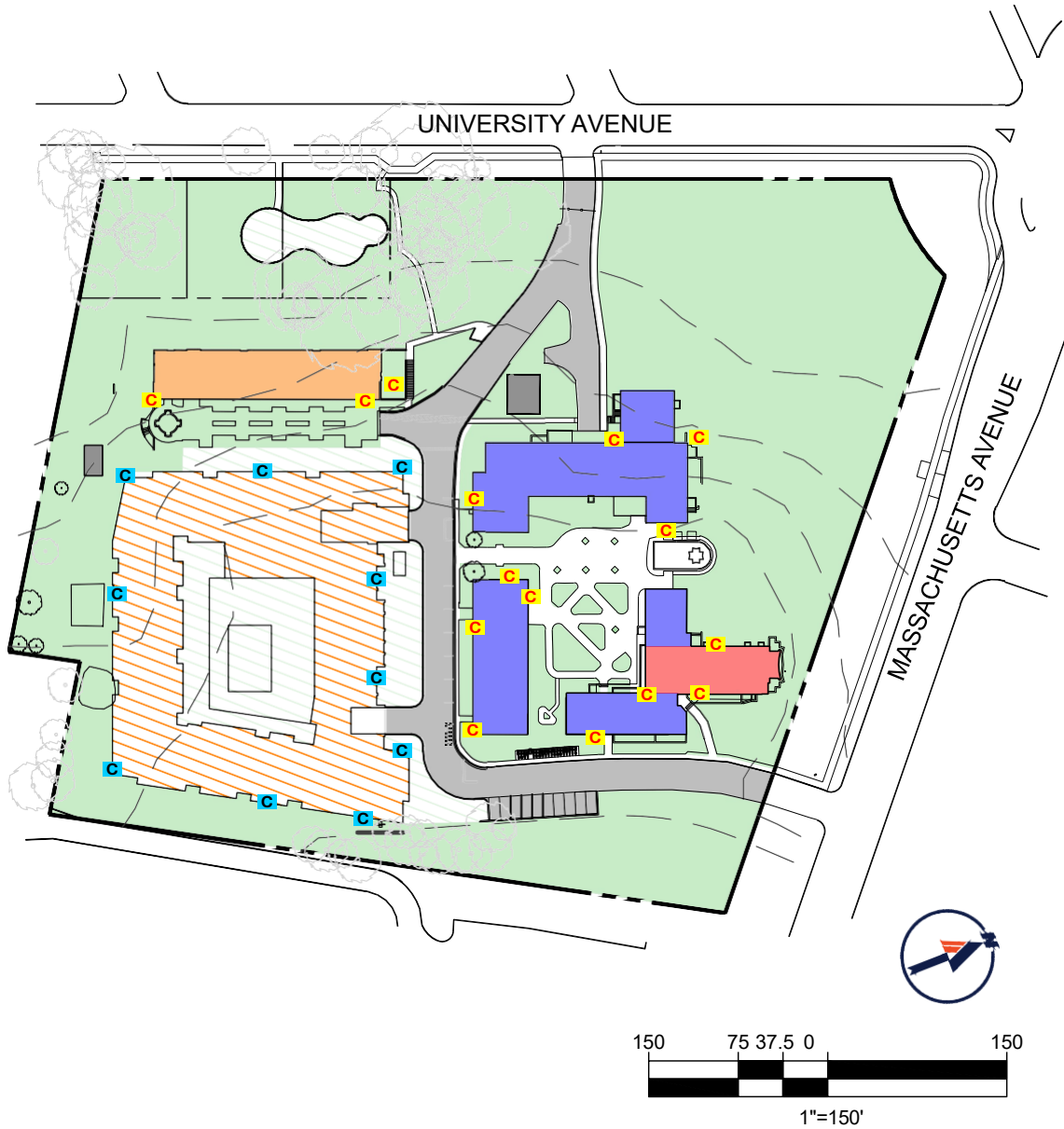
EXHIBIT “I”

Wesley Seminary – New Dormitory Security Features


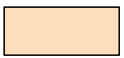




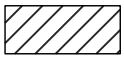






- **Door Access Control:** The new dorm will utilize **access control systems** on all main building entrances to restrict entry to authorized residents. This typically involves key fobs, key cards, or mobile app access. This system helps track entry and exit, enhancing overall building security.
- **On-Site Staff:** Our dedicated **staff is on-site during business hours** to manage property operations, assist residents, and maintain a visible presence. This provides an immediate point of contact for residents and helps deter unauthorized activity during the day. In addition to the on-site staff, there will be a handful of **resident ambassadors** living in the dorm, similar to typical on-campus “RA” structures. The ambassadors are there to assist residents, are empowered to report any issues, and are first in line for monitoring the dorm, particularly during non-business hours.
- **Nighttime Patrols:** While we don't have continuous on-site staff at night, a **courtesy officer will conduct patrols of the property during the hours the office is closed.** This aims to deter crime and address any immediate concerns that may arise during off-hours.
- **Coordination with Local Police Department:** Wesley and Landmark will fully cooperate with MPD. Beyond typical incident reporting, any **set coordination with MPD will be dictated by their typical requirements.**
- **Coordination with American University:** Wesley and Landmark intend to fully cooperate with AU regarding all AU students living in the new dormitory on Wesley’s campus.
- **Area of Refuge (AOR) Call Box:** The property will be equipped with an AOR emergency call box that will be located in the new dorm, likely in the parking garage. The AOR can be activated by an individual needing assistance and will typically connect directly to a 911 operator or to a call center than then contacts 911.
- **Other Security Features in the Building:**
 - **Security Camera System:** A comprehensive **security camera system** is strategically deployed throughout the property, covering common areas, entry points, and other key locations (see next slide). These cameras serve as a deterrent and provide valuable footage for investigation if an incident occurs. The camera systems will be monitored by the on-site operations team.
 - **Emergency Maintenance:** We provide **emergency maintenance services** that are available to be called out as needed, addressing urgent issues that may impact resident safety or property integrity outside of business hours.
 - Other common features include well-lit common areas, alarm systems, smart locks on individual units, and package lockers with controlled access.

WESLEY SEMINARY CAMPUS PLAN

Campus Security Camera Plan



KEY

	PROPOSED RESIDENTIAL		RESIDENTIAL
	PROPOSED OPEN SPACE		ACADEMIC/ ADMINISTRATIVE
	PROPOSED SUPPORT PARKING/ OPEN AREA		CHAPEL
	PROPOSED SUPPORT STRUCTURE		SUPPORT STRUCTURES
	PROPOSED ACADEMIC/ ADMINISTRATIVE		SUPPORT PARKING/ OPEN AREA
	CAMPUS BOUNDARY		OPEN SPACE
	TREE		

C Camera Locations on Proposed Dorm

C Camera Locations on Campus Security

Note: Security camera locations are shown schematically and are subject to adjustment based on security consultant's recommendations.

BOHLER DC//

1331 PENNSYLVANIA AVE., NW,
STE. 1250 NORTH
WASHINGTON, DC 20004
Phone: (202) 524-5700

EXHIBIT “J”

Construction activities in connection with the development of University Housing (“Project”) on the campus of Wesley Theological Seminary (“WTS”), subject to the approval of the DC Zoning Commission, will be conducted by a fully licensed and insured General Contractor (“Contractor”) in accordance with the terms of this Construction Management Plan (the “Plan”), as detailed below.

1. Work Hours

- a. The normal construction work week will be Monday through Friday from 7:00 AM until 6:00 PM. Work may also be conducted on Saturdays from 7:00 AM until 5:00 PM, as needed to maintain the project schedule. No construction activity will occur on Sundays or holidays unless approved by ANC 3D and ANC 3E and an After Hours Permit is issued by the District of Columbia Department of Buildings, Permit Operations Division.
- b. The Contractor will make good faith efforts to limit noisiest and most disruptive work to between 8:00 AM and 5:00 PM on weekdays.

2. Traffic Management and Parking

- a. All access and egress to the construction site will occur from Massachusetts Avenue entrance. If exceptional conditions mandate use of University Avenue by construction vehicles (e.g., construction crane and tractor trailers) to access the construction site, the only access will be from the existing exit to University Avenue with right turn only for exiting vehicles.
- b. No new access to the construction site will be created from University Avenue, except for the limited purpose and duration for the demolition of the Old President’s House and planned restoration and landscaping of that area and installation of the Community Playground.
- c. Queuing of construction related vehicles will not occur at any time on adjacent neighborhood streets.
- d. All deliveries of project related materials, construction, or otherwise, will occur only during the Work Hours specified in Section 1.
- e. The Contractor will secure offsite parking for construction personnel and provide shuttle services as necessary. Construction personnel parking on University Avenue and neighborhood streets will be strictly prohibited by contract. The Contractor will encourage the use of public transportation and carpooling by construction personnel during the course of the Project.

3. Site Management

- a. The Contractor will erect and maintain temporary 6’ tall, construction fencing with dark colored mesh screening (no logos or verbiage permitted) and barricades in order to secure the construction site and will maintain temporary storm water management systems throughout the period of construction until such time as the permanent facilities are constructed, approved, and operational to prevent adverse water impacts on the adjacent neighborhood.
- b. All trenches must either be filled or steel plated at the end of each workday; no trenches are permitted to remain open overnight.
- c. All construction materials and equipment will be stored on campus at the construction site.

- d. A minimum amount of lighting, directed away from residential properties, will be provided at the construction site. These lights will be sufficient to provide necessary security and to comply with District of Columbia and OSHA safety standards.
- e. The Contractor will be required to maintain a clean work site and surrounding public street including removal of trash, mud, and debris from construction activities at the end of each workday.
- f. The Contractor agrees that the wheels of all dump trucks, concrete trucks, and other construction trucks will be washed down prior to leaving the construction site in accordance with DOEE and DDOT standards and guidelines.
- g. The Contractor will implement a rodent and pest control plan through the entire construction duration.
- h. Vehicular and pedestrian directional and safety signage will be provided. Site access points will be clearly marked, and a permit board including jobsite safety protocols and contact information will also be provided onsite.
- i. Construction trailers will be located within the construction site.
- j. All sani-johns will be located within the construction site with temporary 6' tall construction fencing with dark color mesh fabric (no logos or verbiage permitted) or some other means. This screening is in addition to the perimeter construction fence. Sani-johns must be placed a minimum twenty-five (25') feet away from the public ways or sidewalks. Sani-johns will be kept clean and serviced on a minimum weekly basis.

4. Contractors and Subcontractors

- a. The Contractor will require that all contractors and subcontractors be contractually required to follow the terms of, and comply with, the policies set forth in this Plan.
- b. Smoking is prohibited inside any building, outside any building, on the construction site, and on WTS's campus. For the purposes of the Section "smoking" shall include cigarettes, clove cigarettes, cigars, pipes, chewing tobacco, snuff, tobacco pouches, or electronic e-cigarettes, vape, jewel, e-juice, and similar items.
- c. The playing of loud music is prohibited inside any building, outside any building, on the construction site, and on WTS's campus. For the purposes of the Section "playing of loud music" shall include transistor radios, CD players, tape players, portable music players, MP3 players, iPods, iPads, cell phones, televisions, and similar items.
- d. The Contractor will specify a central location on construction site away from University Avenue for construction personnel to take breaks and eat lunch with sufficient trash receptacles to prevent debris from migrating across the site and/or onto adjacent properties.
- e. Worker Conduct: All construction personnel and individuals under contract or control of the Contractor are to conduct themselves in a respectable manner consistent with the environment of the WTS's operations. No lewd or distasteful clothing, language, partial nudity or inappropriate actions will be tolerated. No fraternization with staff, students, residents, or neighbors will be allowed. WTS reserves the right to order dismissal of any personnel or individuals violating the above under a zero-tolerance policy.

f. Security Badge System and Identification:

- i. WTS will require the Contractor to maintain a master list of the names of all construction personnel either directly employed by the Contractor or in the employ of any subcontractor who will be present onsite. This list shall be updated on a regular basis.
- ii. WTS will require the Contractor to implement a security badge system for all construction personnel onsite. This system shall include either stickers on hard hats or clip on badges with an ID number corresponding to a master list that indicates the worker's name and company. Construction personnel who do not display security badge identification will be removed from the site until properly registered and/or wearing badges.
- iii. Prior to working onsite, all construction personnel will undergo a project orientation that includes a review of this Plan.

5. Communication

- a. WTS will establish a neighborhood Construction Management Committee ("CMC") to discuss ongoing issues during the construction phase of the project. The CMC will meet on a monthly basis thru the duration of the construction phase. Representatives will include ANC 3E, ANC 3D, CLC, the Contractor, and WTS.
- b. WTS will designate a representative to be the key point of contact during the period of construction ("Representative"). Any time construction activity associated with the project is occurring, the Representative or his/her designee shall be available onsite, by telephone, or by email to receive communications from the residents of the surrounding community. Prior to the start of construction, contact information for the Representative or his/her appointed designee will be provided to members of the community and posted onsite. In addition, the University will also provide a telephone number to contact in case of emergency during hours in which no construction activity is occurring. The Representative and emergency contact(s) shall document and promptly respond to all communications received from members of the community.

6. Construction

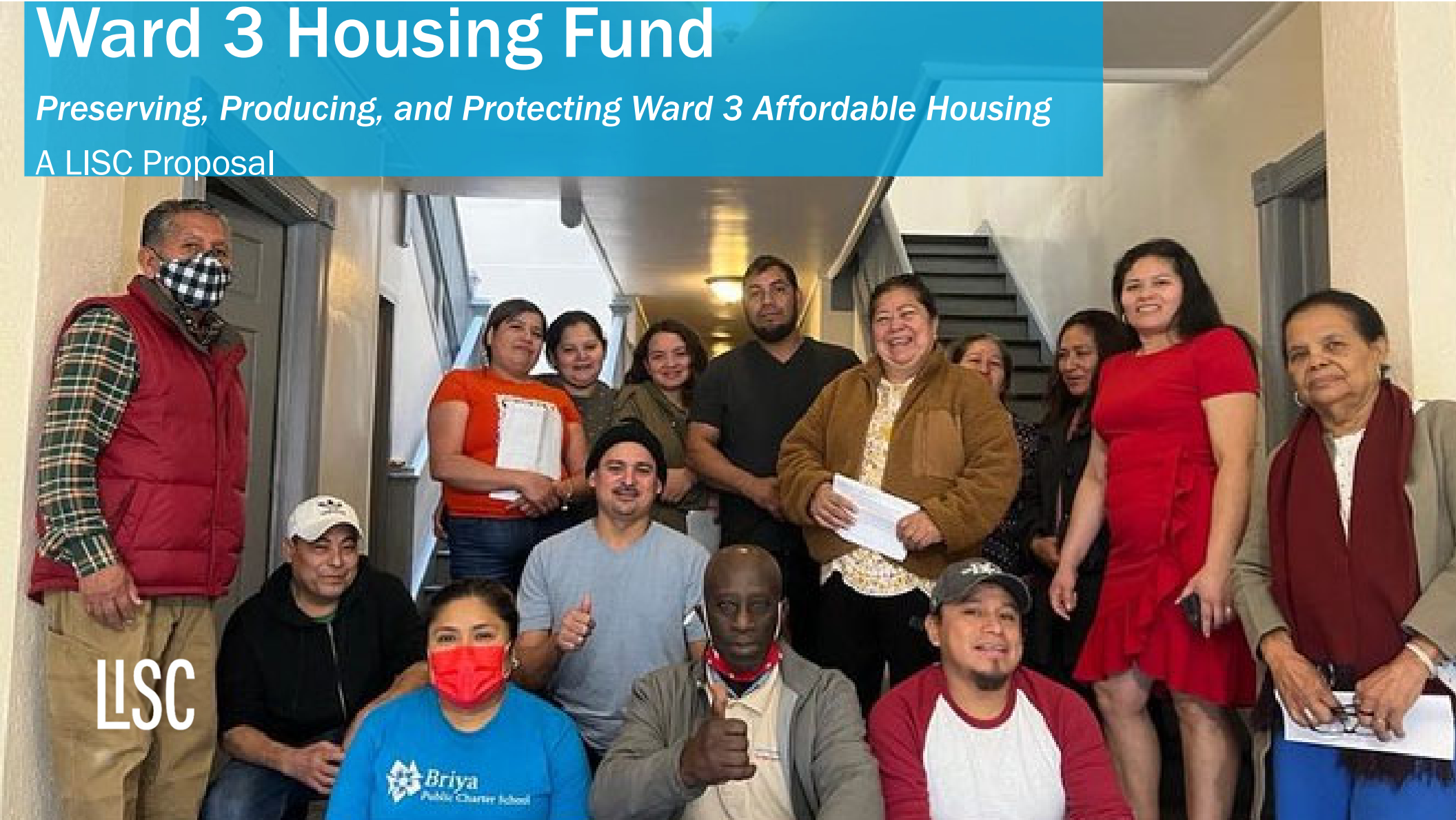
- a. The Contractor will not use piledrivers during the sheeting and shoring phase of construction and will pursue alternative drilling measures as much as feasibly possible. Upon verification that drilling is not feasible, the Contractor will provide notice to ANC 3E, ANC 3D, and the CLC about the timing and duration of any such pile driving and will take all reasonable measures to mitigate noise impact, and will respond promptly to community concerns conveyed regarding noise that exceeds the legal limits, and undertake prompt action to address the problem.

EXHIBIT “K”

Ward 3 Housing Fund

Preserving, Producing, and Protecting Ward 3 Affordable Housing

A LISC Proposal



Together with residents and partners, LISC helps forge resilient and inclusive communities of opportunity across America—great places to live, work, visit, do business and raise families.

LISC's Model

LISC is:

- A certified Community Development Financial Institution (CDFI) by the U.S. Treasury Department
- Nonprofit 501(c)(3)
- S&P rated



Pool Public and Private Dollars

We raise funds from philanthropies, corporations and financial firms, federal, state and local governments and through the capital markets.

We also generate income through our lending services and fund management.



Work With Local Partners

Through a network of local offices and community-based partners across the country, we provide grants, loans, equity and technical assistance.

We also lead advocacy efforts on local, regional and national policy.



Support People and Places

By investing in housing, businesses, jobs, schools, public spaces, safety, youth, health centers, grocery stores and more, we catalyze opportunities in communities nationwide.

LISC's National Impact Since 1979

Across 38 local offices

We create opportunities
for people to thrive.



506,300 affordable homes for more than a million people



515 schools and early childhood centers for **124,000+** students



452 fields and recreational spaces for more than **745,000** kids



130 Financial Opportunity Centers® in more than **30** urban and rural markets nation-wide serving tens of thousands of people annually



210 food and health-related projects, including clinics and grocery stores serving thousands of families

Plus 100s of other retail, arts and community projects

LISC DC

LISC DC is one of LISC's longest standing offices. Founded 1982, our local office is an investor, capacity builder, and convener that works with partners to bring local neighborhood ideas to life.



Housing
Oramenta Gardens



**Community Centered
Economic Inclusion**
Anacostia



**Convening &
Capacity Building**
Blue Line Corridor

\$557 Million Invested



\$3.3 Billion Leveraged



15,000+ Homes

Affordable homes built
and/or preserved

3.7 Million Square Feet

Of commercial,
retail and community
space

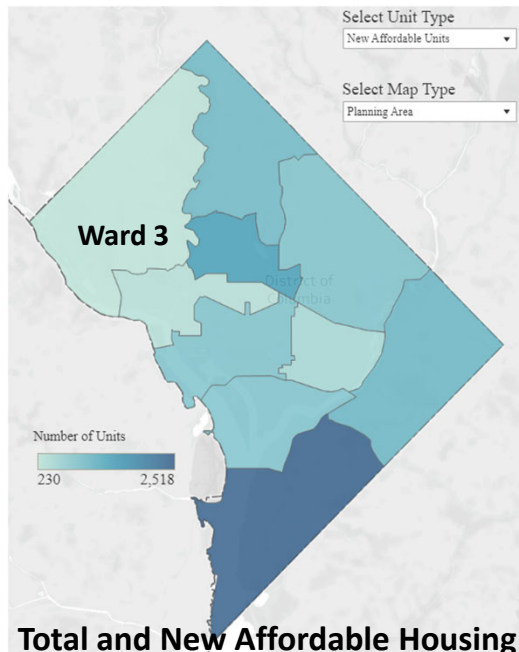
National Network



Ward 3 is Well-Below District Affordable Housing Goals

Mayor's Plan

In 2019, DC Mayor Muriel Bowser issued plan to build 36,000 housing units in the city, including 12,000 affordable units by 2025.

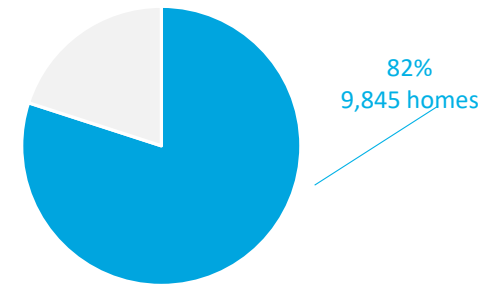


Total and New Affordable Housing Units Since 2019 by Planning Area

District's Progress to Date

DC has already reached 82% of the District-wide 9,845 units affordable housing goal

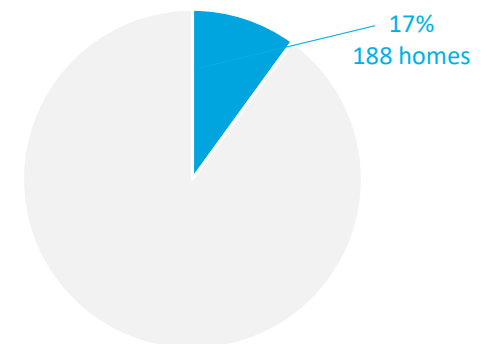
DC Affordable Homes



West of Rock Creek Falls Short

Rock Creek West remains far below the City's 1,600 goal at just 17% or 188 units

West of Rock Creek Affordable Homes



Affordable Housing Challenges in Ward 3

1. High cost of Land
2. Competition from market-rate developers
3. The length of time it takes to develop an affordable housing project (NIMBY)
4. High Interest rates
5. Increasing construction costs
6. Difficulty securing long-term, permanent financing

RESULT: Very few new construction projects on tap in Ward 3



Proposal: Establish Ward 3 Housing Fund

Concept

The Ward 3 Loan Fund will offer flexible, low-cost capital to support the production and preservation of affordable housing in Ward 3.

Blend Wesley contribution with nonprofit capital to catalyze investment in Ward 3 affordable housing.

Structure

The Ward 3 Fund will complement acquisition and permanent financing for affordable housing in Ward 3.

- Lower interest rate, 3-4%
- Deepen affordability to below 60% AMI.
- Affordability Covenant for longer-term affordability
- Focus on preservation, pending improved market conditions
- Some contributions can be repaid and revolved by LISC



Potential Recipients of Ward 3 Loan Fund

Project	Address	Unit Count	Rentable SF	Total Development Cost	First Loan Needed	Wesley Infusion	Present Affordability
Somerset	ANC 3E	72	71,885	\$ 58,000,000	TBD	\$8,000,000	All units 30-50% AMI
SOME Woodley Park	2607 Connecticut Avenue NW	23	18,942	\$ 11,610,000	\$ 6,500,000	\$2,700,000	All units under 30% AMI
Wisconsin Ave Coop	3218 Wisconsin Avenue NW	20	9,713	\$ 7,101,366	\$ 2,600,000	\$1,000,000	50% of units at 80% AMI
DevonCort	2715 Cortland Pl NW, 2760 Devonshire Pl NW	45	30,864	\$ 11,600,000	\$ 5,800,000	\$2,000,000	80% at 80% AMI, 20% at 60% AMI
Tunlaw	2626-2628 & 2632-2634 Tunlaw Rd	65	46,500	\$ 14,778,000	\$ 13,897,000	\$2,300,000	50% of units at 80% AMI
TOTAL		225	106,019	\$ 103,089,366	\$ 28,797,000	\$8,000,000	

Ward 3 Housing Fund Mechanics

1. Wesley IZ Funds granted to LISC; Grant agreement to govern use.
2. LISC will work with developers in Ward 3 footprint with mission-aligned projects
3. LISC will underwrite loans and review at credit committee, ensuring rigorous evaluation for project viability, mission-fit, and borrower capacity
4. LISC will deploy loan to project
5. LISC will track development progress, units produced or preserved, and provide an annual report to share with project partners
6. Repaid fund will be re-deployed as received.

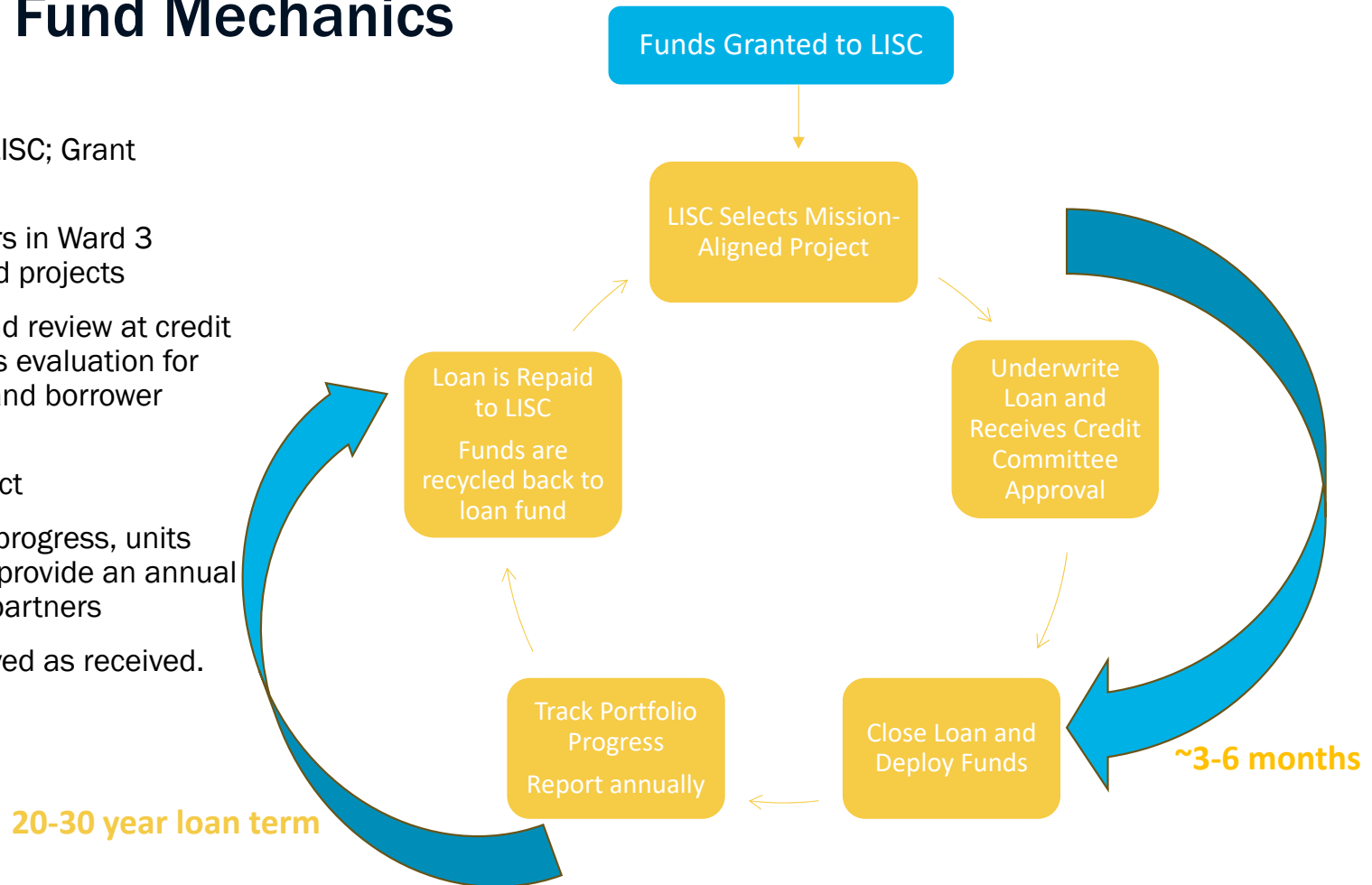


EXHIBIT “L”

COMPREHENSIVE PLAN EVALUATION

1 Executive Summary

The campus plan for Wesley Theological Seminary (“Wesley”) has been evaluated through a racial equity lens, focusing on consistency with the D.C. Comprehensive Plan (“Comp Plan”) and the Zoning Commission’s Racial Equity Tool. The analysis assesses the proposed dormitory’s impact on housing, displacement, access to opportunities, environmental changes, and community engagement to ensure equitable development.

Key Findings:

- Housing and Displacement
 - The proposed dormitory will replace two existing dormitories, increasing capacity from 90 student beds to 659 without causing direct displacement.
 - Indirect displacement is not anticipated, as increased on-campus student housing will reduce pressure on the surrounding rental market.
 - The plan supports the Comp Plan’s goal of expanding affordable housing by freeing up lower-cost housing in adjacent neighborhoods.

- Physical Improvements and Sustainability
 - The project will incorporate green infrastructure, including a green roof, solar panels, stormwater management systems, bioretention facilities, and tree preservation efforts.
 - The dormitory is designed to achieve LEED Mid-Rise Residential Gold certification, ensuring energy efficiency and the use of environmentally preferred materials.
 - Public space improvements will include landscaping along University Avenue, creating a more pedestrian-friendly environment.

- Access to Opportunities
 - The dormitory’s proximity to the Tenleytown-AU Metro station and other transit options will enhance student access to jobs, services, and entertainment across the District.
 - The project will maintain and expand on-campus employment opportunities and continue to train students for religious and social service careers.
 - Access to recreational spaces, including a new neighborhood playground, Rock Creek Park, and the Friendship Recreation Center, will provide additional community benefits.

- Community Engagement and Priorities

- 18 Community Liaison Meetings and 20 ANC Meetings (2019-2024) informed the planning process.
- Community feedback led to significant modifications, including a reduction in building height, increased setbacks, and adjustments to the dormitory's top floor design to minimize visual impact.
- The proposed campus plan aligns with local priorities by ensuring institutional expansion does not negatively affect the surrounding neighborhood.

Conclusion

The proposed campus plan aligns with the Comp Plan's goals and advances racial equity by increasing on-campus student housing, enhancing environmental sustainability, improving access to opportunities, and responding to community priorities. The project mitigates displacement risks and promotes equitable development, benefiting both the student population and the surrounding neighborhood.

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1 Introduction

1.1 Purpose of the Report

This comprehensive plan analysis through a racial equity lens evaluates the proposed campus plan for Wesley Theological Seminary (“Wesley”) using the D.C. Zoning Commission’s Racial Equity Tool and Comprehensive Plan (“Comp Plan”) policies. This report examines the campus plan’s impact on housing, displacement, access to opportunity, and community engagement, ensuring consistency with the Comp Plan.

1.2 The Zoning Commission and Racial Equity

The Comp Plan directs the Zoning Commission to consider equity as part of its consistency analysis, meaning that equity is assessed through the policies and objectives of the Comp Plan rather than as a separate determination of a zoning action’s impact. Equity is a recurring theme throughout the Comp Plan, particularly in relation to zoning decisions that prioritize affordable housing, preventing displacement, and expanding access to opportunities.

The Framework Element of the Comp Plan emphasizes that equity is not the same as equality but is achieved through targeted actions and investments that address residents' specific needs. *See* 10-A DCMR § 213.6. Equitable development is described as a holistic, participatory approach that considers land use, housing, transportation, environmental factors, and access to essential services like education, healthcare, and employment. *See* 10-A DCMR § 213.7. The District applies a racial equity lens by focusing policies and programs on communities of color, addressing systemic barriers, and ensuring inclusive decision-making. *See* 10-A DCMR § 213.9. The Implementation Element further guides the Zoning Commission in applying this lens by using the Framework Element’s equity principles, along with Citywide and Area Elements, to align zoning decisions with district-wide equity objectives. *See* 10-A DCMR § 2501.6.

1.3 Project Summary

Proposed Zoning Action:	The Applicant proposes to update the campus plan for Wesley Theological Seminary, which will include a new dormitory for use by Wesley and American University (“AU”) students.
Current Zone:	RA-1
Proposed Zone:	RA-1
Future Land Use Map (“FLUM”) Designation:	Institutional
Generalized Policy Map (“GPM”) Designation:	Institutional

2 Part One: Comprehensive Plan and Racial Equity Analysis

As part of the racial equity analysis, the Applicant is expected to discuss the Citywide and Area Elements of the Comp Plan that explicitly focus on advancing equity. Additionally, where applicable, the analysis should include relevant Small Area Plans and City Center Plans. This discussion should demonstrate how the proposed zoning action aligns with the Zoning Commission’s expectations for applying a racial equity lens, as well as the Office of Planning’s evaluation of equity considerations.

2.1 Future Land Use Map

The FLUM shows the general character and distribution of recommended and planned uses across the city, and, along with the GPM, is intended to provide generalized guidance on whether areas are designated for conservation, enhancement, or change. *See* 10-A DCMR §§ 200.5, 224.4. The land use category descriptions on the FLUM describe the general character of development in each area, citing typical Floor Area Ratios as appropriate. However, the granting of density bonuses may result in densities that exceed those typical ranges stated in the land use category descriptions. *See* 10-A DCMR § 228.1(c). By definition, the FLUM is to be interpreted broadly and the land use categories identify desired objectives. *See* 10-A DCMR § 228.1(a). Decisions on requests for rezoning shall be guided by the FLUM read in conjunction with the text of the Comp Plan (Citywide and Area Elements) as well as Small Area Plans pertaining to the area proposed for rezoning. *See* 10-A DCMR § 2504.5.

As shown below, the FLUM designates the Property as **Institutional**.

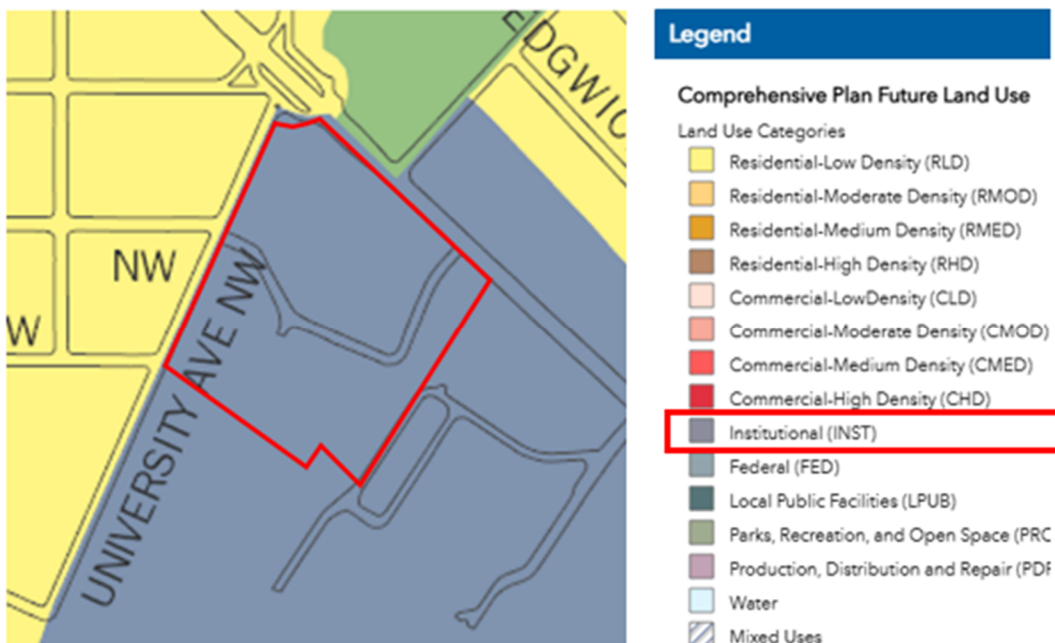


FIGURE 1: FUTURE LAND USE MAP

The Framework Element describes this designation as follows:

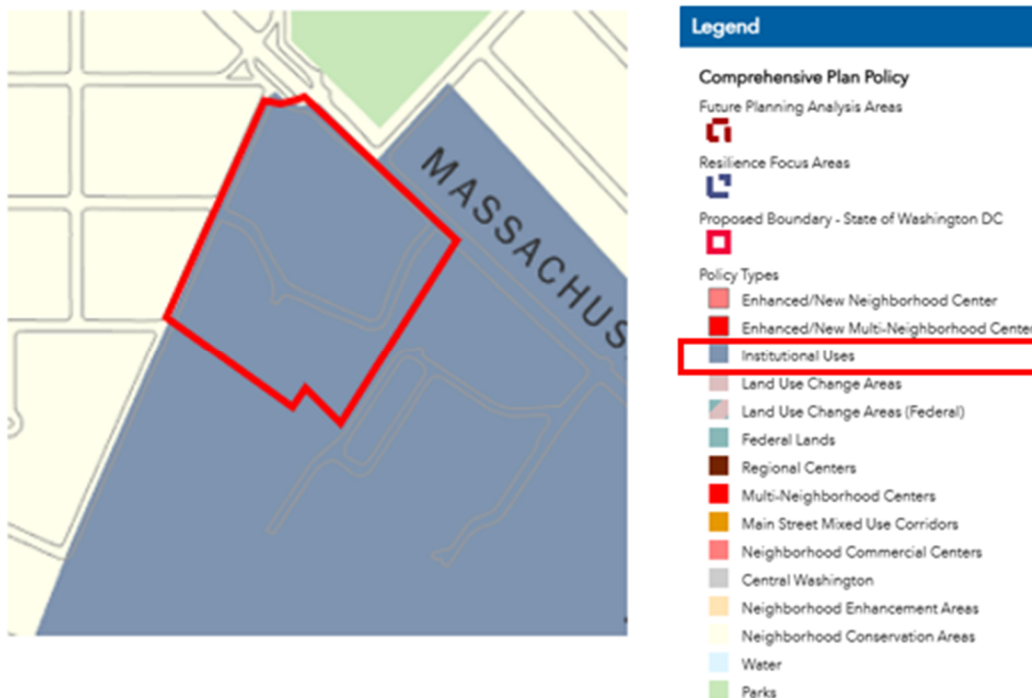
- **Institutional**: This designation includes land and facilities occupied and used by colleges and universities, large private schools, hospitals, religious organizations, and similar institutions. While included in this category, smaller institutional uses such as churches are generally not mapped, unless they are located on sites that are several acres in size. Zoning designations vary depending on surrounding uses. Institutional uses are also permitted in other land use categories. *See* 10-A DCMR § 227.18

The proposed campus plan is not inconsistent with the Institutional FLUM designation, as Wesley Seminary is indeed an institutional use. It is one of the nation’s leading and largest graduate theological schools (most of which are known as “seminaries” or “divinity schools”), consisting of a diverse student body and offering three master’s degrees and a Doctor of Ministry, as well as several non-degree programs.

2.2 Generalized Policy Map

The purpose of the GPM is to categorize how different parts of the District may change between 2005 and 2025. It highlights areas where more detailed policies are necessary, both within the Comp Plan and in follow-up plans, to manage this change. *See* 10-A DCMR § 225.1. The GPM is intended to “guide land use decision-making in conjunction with the Comp Plan text, the FLUM, and other Comp Plan maps. Boundaries on the map are to be interpreted in concert with these other sources as well as the context of each location.” *See* 10-A DCMR § 225.2.

As shown below, the Property is designated as **Institutional**.



- **Institutional**: The Generalized Policy Map also identifies ... major institutional land uses. The fact that these areas are not designated as Conservation, Enhancement, or Land Use Change Areas does not mean they are exempt from the Comp Plan or that their land uses will remain static. Much of the land identified as institutional on the map represents colleges and universities; change and infill can be expected on each campus consistent with campus plans. *See* 10-A DCMR § 225.22.

The campus plan will maintain and enhance the Seminary's religious and educational mission and presence in the neighborhood and District-wide. **The existing Seminary is not inconsistent with the Institutional GPM designation, as colleges and universities are permitted, and the designation allows for changes to occur to the Property consistent with a campus plan.**

2.3 Citywide Elements

2.3.1 Land Use Element

Comprehensive Plan Analysis

The Land Use Element is the cornerstone of the Comp Plan. It establishes the basic policies guiding the physical form of the City, and provides direction on a range of development, conservation, and land use compatibility issues. The Land Use Element describes the balancing of priorities that must take place in order to accommodate a multiplicity of land uses within the boundaries of the District.

Colleges and Universities in general, and Wesley Seminary in particular, are a significant and vital land use in the District. Institutional Uses occupy almost 2,300 acres - an area larger than all of Washington, DC's retail, office, and hotel uses combined. These uses include colleges and universities, private schools, childcare facilities, places of worship and other religious facilities, hospitals, private and nonprofit organizations, and similar entities. *See* 10-A DCMR § 317.1.

The District is home to about a dozen colleges and universities, enrolling more than 85,000 students. There are also nearly 70 non-local college and university programs that occupy space in Washington, DC. The District contains more than a dozen hospitals, some located on the campuses of its universities and others occupying their own campuses or federal enclaves. Hundreds of nonprofit and private institutions also operate within the District, ranging from private schools and seminaries to historic home museums and the headquarters of leading international organizations. Major Institutional Uses are shown on Map 37. *See* 10-A DCMR § 317.2.

Institutions make an important contribution to the District economy and are an integral part of Washington, DC's landscape and history. The colleges and universities alone employ 29,682 workers. Through partnerships with government and private industry, museums, higher education, and health care institutions provide services and resources to the community that could not possibly be provided by the government alone. *See* 10-A DCMR § 317.4.

The campus plan is consistent with various policies and guidance from the Land Use Element of the Comp Plan, including policies related to: Transportation Impacts of Institutional Uses (LU Policy 3.3.1), Corporate Citizenship (LU Policy 3.3.2), and Non-Profits, Private Schools and Service Organizations (LU Policy 3.3.3).

Wesley Seminary has worked extensively with the community to develop a plan that responds to neighborhood concerns. Notably, the Applicant has reduced the height of the dormitory and provided increased setbacks along the upper stories. The Project will include enhanced landscape buffering along the campus perimeter, clustering the housing interior to the lot and preserving heritage and special trees on the property, and a playground for public use will be constructed along University Avenue.

Educational facilities are encouraged to provide alternative transportation options to mitigate traffic and parking impacts. In this case, they will be mitigated, in part, by the reduction in FAR for the dormitory. Additionally, the Applicant has worked diligently with DDOT to develop additional measures that have been provided in the Comprehensive Transportation Review. See Comprehensive Transportation Review, Exhibits 15A1, 15A2, 15A3 in ZC Case No. 22-13.

Racial Equity Analysis

The proposed dormitory advances racial equity by incorporating measures that reduce transportation burdens and environmental impacts, which disproportionately affect communities of color. By lowering the floor area ratio and promoting ridesharing, public transit, and bicycling, the project mitigates traffic and parking issues. These transportation demand management strategies not only alleviate congestion but also improve access to educational and economic opportunities for underserved communities.

In addition, the dormitory serves as a model of corporate citizenship through its commitment to high-quality, sustainable design. Its adaptive features—such as reduced height, increased setbacks, enhanced landscaping, and preservation—help minimize negative impacts on adjacent residential areas. By integrating community input and safeguarding public spaces, the project supports the equitable expansion of institutional uses while preserving neighborhood quality of life.

2.3.2 Transportation Element

Comprehensive Plan Analysis

The Proposed campus plan is consistent with the policies of the Transportation Element of the Comp Plan, including policies related to: Minimizing Off-Street Parking (T Policy 1.1.8), and Charging Infrastructure (T Policy 5.2.2).

The Proposed campus plan promotes various modes of transportation, including bicycle, pedestrian, and shuttle bus. The Project will improve pedestrian pathways and adds long-term and short-term bicycle parking spaces on campus. The underground parking in the New Dormitory

will provide 6-8 EV charging stations. The New Dormitory will designate an on-campus ride-sharing pick-up and drop-off location and on-campus rental bike and scooter parking area.

Racial Equity Analysis

The proposed dormitory advances racial equity in transportation by aligning with Policy T-1.1.8, which discourages excessive off-street parking to reduce vehicle trips and the associated negative impacts on local communities. By minimizing the provision of parking spaces, the project encourages alternative transportation modes such as ridesharing, public transit, bicycling, and walking. This approach not only helps to lower emissions and traffic congestion—issues that often disproportionately impact communities of color—but also supports healthier, more accessible neighborhoods for all residents, particularly those in underserved areas.

In addition, the dormitory supports Policy T-5.2.2 by integrating electric vehicle (EV) charging infrastructure into its design. Providing EV charging stations, especially at no cost and in publicly accessible locations, promotes the early adoption of cleaner transportation alternatives. This infrastructure benefits not only dormitory residents but also the surrounding community, ensuring equitable access to emerging green technologies. Together, these measures help reduce environmental burdens and promote sustainable mobility, contributing to a more equitable urban environment that supports the health and well-being of historically marginalized communities.

2.3.3 Housing Element

Comprehensive Plan Analysis

The proposed campus plan is not inconsistent with the policies of the Housing Element of the Comp Plan, which addresses the importance of housing to neighborhood quality in DC and the importance of providing housing opportunities for all segments of the population throughout the District. In particular, colleges and universities should address the housing needs of the students and promote the use of such housing by their students. The Project will provide a new dormitory consisting of approximately 215 units, consistent with the Student Housing policy (H Policy 1.3.5).

Racial Equity Analysis

The proposed dormitory advances racial equity by directly addressing the housing needs of students—a core objective of Policy H-1.3.5. By providing on-campus housing, the dormitory not only meets the essential requirement for colleges and universities to accommodate their students but also creates an environment where students from diverse backgrounds, including historically marginalized communities, can live affordably and safely.¹ This helps to reduce the financial and logistical burdens often associated with securing off-campus housing, which can disproportionately impact students of color, thereby promoting more equitable access to educational opportunities.

¹ How the affordable housing crunch is hitting college students. August 20, 2023, accessed February 25, 2025. <https://www.axios.com/2023/08/20/college-affordable-housing-prices>

Furthermore, by ensuring that quality student housing is available and actively promoted, the dormitory supports a more inclusive academic community. When students have reliable, accessible housing, they are better positioned to focus on their studies and fully engage with campus life, contributing to higher retention and success rates.² This stability is particularly crucial for underrepresented groups, who may otherwise face housing instability and the added stress that comes with it. In this way, the dormitory not only fulfills a practical housing need but also plays a vital role in leveling the educational playing field and advancing racial equity across the institution.

2.3.4 Environmental Protection Element

Comprehensive Plan Analysis

The proposed campus plan is not inconsistent with the policies of the Environmental Protection Element of the Comp Plan. In particular, the Project would preserve existing heritage and special trees on Campus and install new landscape, maintaining the Campus' character as a wooded environment, consistent Tree Requirements in New Developments (E Policy 2.1.2). Additionally, the Project would advance Support for Green Building, as both proposed new buildings would be certified LEED Gold (E Policy 3.2.1).

Racial Equity Analysis

The proposed dormitory advances racial equity by incorporating robust environmental protection measures that align with Policy E-2.1.2 on tree requirements. The design includes enhanced landscape buffering along the campus perimeter and the preservation of heritage and special trees, along with plans for new tree plantings and ongoing maintenance. These measures help create and sustain green spaces that improve air quality, reduce urban heat island effects, and provide recreational and psychological benefits. Since communities of color have historically had less access to quality green spaces and bear a disproportionate share of environmental hazards, these enhancements contribute to environmental justice by ensuring that all residents enjoy the benefits of a healthier, greener urban environment.

In addition, the dormitory supports Policy E-3.2.1 by contributing to the District's goal of carbon neutrality by 2050. Through sustainable design features—such as a reduced floor area ratio, energy-efficient systems, and the promotion of alternative transportation—the project aims to minimize greenhouse gas emissions and offset any residual emissions. These initiatives not only reduce the overall environmental footprint of the development but also help lower the burden of pollution in areas that have historically suffered from higher levels of environmental hazards. By addressing both tree preservation and carbon neutrality, the dormitory fosters a more equitable distribution of environmental benefits, advancing racial equity by promoting a cleaner, healthier, and more sustainable community for all residents.

² Rethinking Student Housing Operations: Fostering Communities Beyond Walls. May 30, 2024, accessed February 25, 2025. <https://campusadv.com/rethinking-student-housing-operations-fostering-communities-beyond-walls/#:~:text=A%20Voice%20for%20All:%20Embracing%20Diversity%20and%20Inclusion&text=By%20implementing%20unbiased%20policies%2C%20promoting,feels%20a%20sense%20of%20belonging.>

2.3.5 Educational Facilities Element

Comprehensive Plan Analysis

The campus plan is consistent with various policies and guidance from the Educational Facilities Element of the Comp Plan, including policies related to: Corporate Citizenship (EDU Policy 3.2.2), Workforce Development (EDU Policy 3.2.3), Universities as Community Partners (EDU Policy 3.2.3), University Research Partnerships (EDU Policy 3.2.5), Balancing University Growth and Neighborhood Needs (EDU Policy 3.3.2), Universities as Large Landowners and Campus Plan Requirements (EDU Policy 3.3.3), and Student Housing (EDU Policy 3.3.4).

The proposed campus plan advances several of these policies by allowing it to operate as an open campus for the enjoyment of both students and neighbors. Additionally, it will expand its access by providing a neighborhood playground for public use, fulfilling an important priority for the neighborhood. Wesley Seminary sponsors an internship program that places students at non-profit and community organizations throughout the District, and students provide assistance to the mission of several churches in the area.

The campus plan will advance goals related to housing as well, relieving rental pressures on the neighborhood's private housing stock by developing a dormitory on the Campus.

Racial Equity Analysis

The proposed dormitory advances racial equity in educational facilities by embodying high-quality design and sustainable building practices in line with Policy EDU-3.2.2 on Corporate Citizenship. By incorporating elements of green building methods and low-impact development, the dormitory not only enhances campus aesthetics and functionality but also sets a standard for responsible institutional behavior. Such high-quality architecture can serve as a model for community development, helping to revitalize surrounding neighborhoods that have historically experienced underinvestment and environmental degradation. This commitment to excellence benefits communities of color by fostering an environment that values both historical context and modern sustainability.

In addition, the dormitory supports workforce development (Policy EDU-3.2.3) and university research partnerships (Policy EDU-3.2.5) by creating a stable, on-campus housing option that promotes academic engagement and community collaboration. By ensuring that students have safe, affordable, and accessible housing, the project helps bridge gaps in skills training and career development—issues that disproportionately impact historically marginalized groups. Moreover, the presence of comprehensive on-campus housing facilitates partnerships between students, faculty, and local communities, fostering research initiatives that address community-driven challenges and create more inclusive economic opportunities.

Furthermore, the dormitory advances policies aimed at balancing university growth with neighborhood needs (Policy EDU-3.3.2) and managing the impact of large institutional landownership (Policy EDU-3.3.3). By providing on-campus student housing, the project alleviates pressure on adjacent affordable housing markets, thereby reducing the risk of

displacement in residential communities. This approach not only helps preserve neighborhood quality and character but also ensures that institutional expansion does not come at the expense of local residents. In doing so, the dormitory directly supports Policy EDU-3.3.4, reinforcing the role of on-campus housing in protecting local affordable housing stocks and advancing racial equity by fostering a more balanced, inclusive urban development strategy.

2.3.6 Rock Creek Park West Area Element

Comprehensive Plan Analysis

The campus plan is consistent with various policies and guidance from the Rock Creek West Area Element of the Comp Plan, including policies related to: Economic Development (RCW Policy 1.1.2), Managing Institutional Uses (RCW Policy 1.1.8), Conserving Common Open Spaces (RCW Policy 1.1.9), and Managing Transportation Demand (RCW Policy 1.1.11).

The proposed campus plan will be consistent with the Comp Plan, having a height and building design that is compatible with adjacent buildings on AU's Campus, and additional landscaping and maintenance of the perimeter buffer and large trees will reduce its visual impact overall. The demolition of the Old President's House will create a larger Green Open Space, providing an additional buffer between buildings and the street.

The Applicant has worked extensively with the community to ensure that the impact of the dormitory is mitigated to the extent possible and has agreed to: 1) not increasing enrollment on the campus; 2) provide fewer parking spaces in proportion to the number of beds in the dormitory; 3) prohibit residential parking permits for those living or working on the Campus; 4) restrict delivery movements; 5) and redirect vehicular traffic to an access point on Massachusetts Avenue.

For the reasons noted above, and discussed in detail in Exhibit E, the campus plan satisfies the first prong of the three-part campus plan evaluation standard as being not inconsistent with the Comp Plan and related public policies as a whole.

Racial Equity Analysis

The proposed dormitory advances racial equity within Rock Creek West by fostering public-private partnerships and community amenities that support economic development (Policy RCW-1.1.2). By integrating features that enhance public space and mixed-use development, the project not only contributes to a vibrant local economy but also ensures that diverse communities—including historically marginalized groups—benefit from increased access to quality public amenities. Such measures help bridge the gap between institutional growth and community needs, creating an inclusive urban environment where economic opportunities are shared equitably.

In terms of managing institutional land uses (Policy RCW-1.1.8), the dormitory is designed to harmonize with its surroundings by minimizing adverse impacts on neighboring properties. Its thoughtful design, which includes reduced building height, increased setbacks, and strategic landscaping, respects the existing physical character of the community and safeguards against

potential displacement or disruption. The project also conserves common open spaces (Policy RCW-1.1.9) by preserving green areas and incorporating public recreational spaces, which is vital for community well-being.

Additionally, the dormitory addresses transportation demand management (Policy RCW-1.1.11) by promoting multimodal transportation options, such as improved access to public transit, ridesharing, and biking facilities. This approach helps reduce the volume of vehicle trips and traffic congestion, mitigating environmental impacts like air pollution that disproportionately affect communities of color. Together, these strategies create a development model that not only meets institutional needs but also advances racial equity by ensuring that the benefits of growth are equitably distributed throughout the community.

3 Part Two: Community Outreach and Engagement

The Zoning Commission expects racial equity analysis submissions that analyze a zoning action through a racial equity lens to include a detailed discussion **from the Applicant** on community outreach and engagement efforts.

3.1 Impacted Community(ies)

Wesley is located generally within the Spring Valley neighborhood in the Rock Creek West Planning Area and is generally bounded by Nebraska Avenue and Loughboro Road to the south, Dalecarlia Parkway to the west, and Massachusetts Avenue to its northeast, and is a predominantly single-family neighborhood in a high-opportunity, attractive neighborhood. *See* 10-A § DCMR 2300.2. The Spring Valley neighborhood benefits from its proximity to major institutions. Wesley and American University not only lend an academic and cultural vibrancy to the area, but they also help foster a community that values education, dialogue, and civic participation.

The sense of community in Rock Creek West is reinforced by a particularly active network of neighborhood associations, Advisory Neighborhood Commissions (ANCs), and involved residents. Well-organized citizens associations serve many of the area's neighborhoods, including Spring Valley. *See* 10-A DCMR § 2300.12.

Rock Creek West has consistently experienced strong housing demand, even during periods of population decline in Washington, DC, due to factors such as low crime rates, neighborhood amenities, Metro access, high-performing schools, and active community organizations. *See* 10-A DCMR § 2300.8. However, these same factors have contributed to a significant affordable housing challenge, with 2016 median home prices exceeding \$975,000 and a continued unmet need for affordable and moderate-income units. *See* 10-A DCMR § 2300.9. Expanding housing options, particularly near Metro stations where zoning allows, is a priority to address this gap. As an Area of High Economic Opportunity, Rock Creek West plays a critical role in both preserving existing affordable housing and fostering new mixed-income developments to support Washington, DC's fair housing goals. *See* 10-A DCMR § 2300.10.

Compared to other areas of the District, Rock Creek West is less racially diverse and has an older population. Approximately 80.6 percent of the area's residents are white, which is significantly higher than the District-wide total of 40.7 percent. Only 6.9 percent of the area's residents are Black, and only 11.2 percent are of Hispanic/Latino origin. The area has a higher percentage of Asian residents than the District as a whole (6.4 percent compared to 3.8 percent). Nearly 19 percent of the residents are foreign born, which is substantially higher than the Districtwide total of 14 percent. The area also has a lower percentage of children and a higher percentage of older adults relative to the District as a whole. While 17 percent of the residents are under 18, this was an increase from 12.8 percent in 2000, compared to a District-wide total of 17.5 percent, which has decreased. About 17.2 percent are over 65, compared to 11.9 percent District-wide. The percentage of older adults has increased since 2000, when it was 15.1 percent. *See* 10-A DCMR § 2303.2.

Some of the social characteristics that define the Spring Valley neighborhood include:

- Academic and Institutional Presence: The neighborhood is home to AU and Wesley, which contribute to an intellectual and academic atmosphere.
- Historical Racial and Economic Segregation: Historically, Spring Valley was one of several DC neighborhoods that enforced racially restrictive covenants, preventing Black families from owning homes in the area. Although legally abolished, the lasting effects of this segregation continue to shape the neighborhood's racial and economic demographics.
- Limited Racial and Economic Diversity: Compared to other parts of the District, Spring Valley has lower racial diversity and a smaller percentage of lower-income residents. This homogeneity is reflected in school demographics, business types, and community events.
- Access to Green Space and Amenities: The neighborhood is known for its tree-lined streets, proximity to Rock Creek Park, and access to high-end retail and dining, which contribute to a high quality of life for its residents. These amenities make it a desirable but often financially inaccessible area for many Washingtonians.

3.2 Analysis of Past and Present Racial Discrimination / Harm

Historically, discriminatory land use and financing tools have been used for the exclusion of Black residents from Rock Creek West. The Federal Housing Administration Map of 1937 graded areas of the District for loan approvals using race as a criterion, with many of the highest graded categories concentrated in Rock Creek West. Additionally, the Planning Area has a history of displacement of Black communities, such as in Reno City and the George Pointer settlement. Today, Rock Creek West remains the Planning Area with the highest share of white residents in the District. *See* Rock Creek West Roadmap, 2021.³

3

https://housing.dc.gov/sites/default/files/dc/sites/housingdc/publication/attachments/RCW%20Roadmap_12.16.21.pdf, accessed February 26, 2025

Racially restrictive covenants, which barred the conveyance of property to African Americans, were used by real estate developers and White citizens associations to create and maintain racial barriers. Rock Creek Park was conceived, in part, as a barrier to Black settlement to the west, and many of the neighborhoods in that section of the City were subsequently developed to be economically exclusive via covenants and zoning that favored more expensive, detached housing. *See Mapping Segregation in DC.*⁴

Upheld by the courts, covenants assigned value to housing and to entire neighborhoods based on the race of their occupants and made residential segregation the norm. Federal policy and local zoning codes served to institutionalize segregation and the displacement of Black residents. Enforceable by the courts until 1948, covenants normalized residential segregation. Their use to assign value to housing based on the race of its occupants was reinforced by the concentration of government and private investment in areas where only white residents were allowed to live. Zoning Regulations upheld the same characteristics that made these areas exclusive, for example by requiring single-family housing rather than apartments. *See Mapping Segregation in DC.*

In 1940, racial covenants served to confine the vast majority of DC's expanding Black population to older housing near the city center, near waterfront employment along the Potomac and Anacostia rivers, and to the remote sections of far Northeast and Southeast DC. In fact, the neighborhood of Spring Valley was encumbered by racial covenants and had an all-white population until at least 1960, when more areas of the District opened up to Black families as a result of white flight. *See Mapping Segregation in DC.* The Rock Creek West Planning Area continues to be majority White, making up 77.2% of the area's population. *See OP Demographic Data Hub.*⁵

In reckoning with the inequity that has persisted west of Rock Creek Park, the District released the Rock Creek West Roadmap in 2021, which outlines how the District can achieve ambitious housing goals in Rock Creek West through leveraging housing tools, making targeted investments, and developing neighborhood plans. *See Rock Creek West Roadmap, 2021.* In 2022, OP provided an update toward this end:

- February 2022 - The District selected the Lisner Home for financing to provide affordable senior units near the Friendship Heights Metro station. This was the first time the Housing Production Trust Fund subsidy was used in Rock Creek West.
- March 2022 - The District launched a new program, Tax Abatements for Affordable Housing in High-Needs Areas (HANTA), that provides tax incentives to developers who set aside at least 1/3 of new housing units in their projects for households who earn, on average, 80% of the Median Family Income.
- April 2022 - City Ridge, a large Inclusionary Zoning (IZ) project began to deliver affordable units.

⁴ <https://mappingsegregationdc.org/index.html#mapping>, accessed February 26, 2025

⁵ <https://opdatahub.dc.gov/pages/district-of-columbia-profiles>, accessed February 26, 2025

- May 2022 - The property owners of 3427 Wisconsin Avenue applied for a zoning map amendment that will trigger IZ+ requirements, increasing the proportion of dedicated affordable units on the site up to 20%.
- June 2022 - The final Chevy Chase Small Area Plan was transmitted to City Council for approval, providing guidance on new housing and affordable housing opportunities on Connecticut Avenue. The new zones that implement the recommendations of the Small Area Plan have been approved by the Zoning Commission.
- July 2022 - Planning studies on Wisconsin Avenue and Connecticut Avenue launched to support the development of additional market rate and affordable housing on these high opportunity corridors. These studies have been completed and OP is currently working towards implementing the recommendations from those studies.

Additionally, the United Methodist Church, affiliated with Wesley Seminary, has endeavored to right the wrongs of its history, which includes a checkered past with slavery and segregation. In 1968, the Church formally ended segregation in its churches, and several African Americans were appointed to leadership positions. Decades later, in 2000, the General Conference delegates participated in a service of repentance for racism within the denomination, and African American United Methodists spoke at the inauguration of President Barack Obama in 2009. See United Methodist Church.⁶

Wesley Seminary’s policy on diversity states that “Wesley affirms its identity as a community that intentionally seeks to include persons of both sexes and various national and ethnic backgrounds, ages, and special conditions as Board members, administrators, faculty, staff, and students.” The demographics of the student body confirm this, with a nearly even distribution of black and white students. See Wesley Theological Seminary.⁷

The diversity of the Seminary’s faculty, student body, and the ministry of its alumni and current students demonstrate the wellspring of inclusion and diversity of gender, race and class in the District, including in Spring Valley. More far reaching, Wesley Seminary’s mission is to create leaders who will live, preach, and teach the value and equality of every individual in the District of Columbia, regionally, nationally and internationally that reaches far beyond the United Methodist Church. Both Wesley Seminary and AU are well-known within the United Methodist Church as strong advocates for full LGBTQ inclusion.

3.3 Summary of Community Outreach Efforts

For Wesley, its role in the community and relationship with its neighbors is very important and a natural extension of its ministry. Beginning with its inaugural campus plan in 2005 and over the last seventeen years, this community engagement has continued through the established Community Liaison Committee (“CLC”), Advisory Neighborhood Commissions 3D and 3E, other established neighborhood organizations, including the Spring Valley-Wesley Heights Citizens Association, and other interested parties and individuals. This process has been candid and

⁶ <https://www.umc.org/en/who-we-are/history>, accessed February 26, 2025

⁷ <https://www.wesleyseminary.edu/aboutus/>, accessed February 26, 2025

productive at every stage of Wesley Seminary's evolving campus plans and will be extended throughout the application.

Outreach to the community for this proposed plan began in 2019. Although this process was slowed by an unforeseen change in development partners and the COVID-19 emergency, these meetings were fully renewed in 2021 and continues to be extensive.

Feedback from the community has resulted in changes to the dormitory's design, including a reduction in height, gross floor area, and parking spaces, additional landscaping, pedestrian improvements, and the inclusion of a community playground. Additionally, the Applicant continues to discuss the provision of locating affordable housing within Ward 3 with the ANC.

3.4 Community Priorities and Impact on the Zoning Action

The planning and development policies for the Rock Creek West Area Element derive from three large Comp Plan workshops that took place in Rock Creek West during 2005 and 2006. These meetings provided a chance for residents and local businesses to discuss both Districtwide and neighborhood planning issues. 10A DCMR §§ 2307.1, 2307.2. Although these workshops occurred prior to the latest Comp Plan amendment cycle, it provides insight into the current challenges facing the Planning Area based on the following key messages delivered by the community:

- While there is support for development on underutilized sites along the major corridors, issues of height, scale, character, and density remain a source of concern, as well as a source of debate within the community. The only acceptable growth rate is one that matches infrastructure capacity.
- Neighborhoods seek assurances that existing buffers will be maintained for multi-story apartment buildings that abut single-family homes along rear lot lines, and that additional buffers, setbacks, and a stepping down in building heights will be provided, if and when, infill development occurs along the corridors.
- There is broad support for requirements to include affordable or moderate income housing units within new market-rate projects, but the prospect of density bonuses and other zoning flexibility in exchange for these units continues to raise objections.
- A wider variety of retail choices is needed in some parts of the Planning Area. The community continues to favor neighborhood-serving retail rather than office space along the corridors, both to meet community needs and to avoid uses that would generate commuter traffic.
- There is support for development that emphasizes walkability over auto-orientation, provided that height, scale, parking, infrastructure capacity, and other issues can be reconciled.

- More integrated solutions to traffic control, including bus improvements, bicycle improvements, transportation demand management programs for new development, and more efficient use of existing roadways (such as synchronized traffic signals), are needed.
- Additional parking management measures are needed.
- The community’s public facilities are experiencing the strains of age and increased demand.
- The character of new development is an issue, particularly as more smaller homes are expanded or torn down and replaced with larger homes.
- The preservation of the natural environment and improvement of environmental health remain top priorities.
- Aesthetic improvements are needed along some of the area’s roadways to become the gracious gateways to the nation’s capital they were intended to be.
- There is support in the community for scattering small-scale shelters for persons experiencing homelessness (especially in places of worship), providing social service facilities on the commercial corridors, and accepting small community residence facilities within single-family neighborhoods.
- Pursuant to the District’s zoning regulations, the compatibility of institutional uses, including private schools, nonprofits, large nursing homes, colleges, hospitals, and religious establishments, should be maintained, their expansion carefully controlled, and conversion to other non-conforming uses avoided. Solutions to traffic, parking, and other issues should continue to be developed so that the quality of life in surrounding neighborhoods is not diminished.

10A DCMR § 2307.4

During its review of the campus plan (Zoning Commission Case No. 22-13), ANC 3D offered its support of the plan subject to conditions that were intended to mitigate the impacts of the new dormitory. In its letter of support dated September 7, 2022, the ANC stated that the Seminary had agreed to incorporate several additional elements into their Plan as requested by the ANC. *See* Exhibit 54 in ZC Case No. 22-13. Specifically, the Seminary agreed to the following:

- “Evaluate options for reducing the design, size, massing and number of beds in the New Dormitory to further mitigate any potential objectionable conditions.” (*See* Condition 16.)
- “Further limit the use of University Avenue for exiting vehicles. In consultation with DDOT, the Seminary will request that use of the University Avenue driveway be closed for exiting vehicles 24/7 and that only limited service, delivery and emergency vehicles 2 can enter and exit the Campus from University Avenue.” (*See* Conditions 26 & 27. It appears that these two conditions could be combined for the sake of clarity.)

- “In conjunction with the expanded limits on the use of University Avenue, the Seminary will encourage DDOT to allow left turns by vehicles leaving the Campus at Massachusetts Avenue during agreed time periods with appropriate signage.” (See Condition 25.)

ANC 3D also included that there is “[g]eneral agreement that neighborhoods are better off when students live on a campus rather than in the neighborhood. Our ANC has several academic institutions within or close to its borders including American, Georgetown, and George Washington (Mount Vernon campus), so we can therefore speak from experience. The approval by the Zoning Commission of this new dormitory would, in our view, provide a significant benefit to the larger ANC 3D and ANC 3E community in this regard, by helping Wesley Seminary thrive in place and providing needed housing for students.” See Exhibit 54 in ZC Case No. 22-13. At the urging of the community, the top levels of the building facing University Avenue have been further setback 27.5 - 32.5 feet from the University Avenue face of the building by eliminating four units with twenty beds. Additionally, the layout of the top-level units has been rotated ninety-degrees so that windowless walls now face University Avenue.

4 Part Three: Disaggregated Data Regarding Race and Ethnicity

The Zoning Commission expects disaggregated race and ethnicity data from the Office of Planning in every racial equity analysis submission that analyzes a zoning action through a racial equity lens. The Applicant will provide any additional information as requested by the Zoning Commission.

5 Part Four: Zoning Commission Evaluation

5.1 Direct Displacement

The proposed dormitory will advance racial equity by ensuring no physical displacement of students. The project involves replacing two existing dormitories, which currently provide 90 student beds, with a new dormitory that will offer 659 student beds. This expansion of student housing capacity will not only accommodate more students but also preserve access to stable housing for current residents, preventing displacement and fostering a more equitable environment for all students, regardless of their racial or socioeconomic backgrounds.

5.2 Indirect Displacement

Indirect displacement is not anticipated with the proposed dormitory project. The development is designed to increase housing capacity without negatively impacting the surrounding community or existing residents. By providing more student beds, the project helps meet the demand for on-campus housing, which can reduce the pressure on nearby rental markets and prevent displacement of local residents. As such, the proposed dormitory will contribute to a more stable and equitable housing environment without causing adverse effects on neighboring areas.

5.3 Housing

The proposed dormitory aligns with the Comp Plan’s goals to increase housing in high-priority areas by providing more lower-cost housing options for District residents. When students occupy the dormitory rooms on campus, it will free up housing in the surrounding neighborhoods, potentially lowering rental pressures and improving affordability for local residents. Additionally, the project includes the replacement of 43 family-sized housing units, ensuring that housing options remain available for families in the area. While inclusionary zoning units are not part of this specific development, they will be provided in other projects within Ward 3, further supporting the city's efforts to promote equitable housing access. This development supports both the immediate and long-term housing needs of the District, consistent with the broader goals of the Comp Plan.

5.4 Physical

The proposed dormitory will bring significant physical improvements to the environment, enhancing both the campus and surrounding areas. Public space improvements will include landscaping along University Avenue and streetscape enhancements to create a more pedestrian-friendly environment. Infrastructure upgrades will feature a green roof, advanced stormwater management systems, and the installation of bioretention facilities, contributing to environmental sustainability. The dormitory is designed to achieve LEED Mid-Rise Residential Gold certification, ensuring it meets high standards for energy efficiency and environmental performance. Additionally, the building will utilize environmentally-preferred materials, and the continued review for solar panel installation underscores its commitment to renewable energy. Tree preservation and increased permeable surfaces will further enhance the campus’s ecological footprint. The project also provides 210,000 square feet (4.8 acres) of open green space on the Spring Valley Campus, offering ample areas for recreation and relaxation. A neighborhood playground will replace the Old President’s House, and open spaces will be provided along University Avenue and Massachusetts Avenue. The influx of students will invigorate campus life, while shared student spaces within the dormitory will foster community and collaboration, contributing to a vibrant, sustainable campus environment.

5.5 Access to Opportunity

The proposed dormitory will significantly enhance access to opportunities for students and the broader community. Located within half a mile of the Tenleytown-AU Metro station and other public transit options, it will provide convenient access to District-wide jobs, restaurants, services, and entertainment. The project will help maintain and increase employment on campus, continuing to train students for careers in religious and social service sectors within the District. Additionally, the dormitory’s proximity to retail, services, and amenities along the Wisconsin Avenue corridor will further support students’ daily needs and the local economy. The development will also offer access to a new neighborhood playground to be installed on campus, as well as nearby nature areas and reserves, including Rock Creek Park, Battery Kemble Park, and Spring Valley Park, providing ample opportunities for recreation and outdoor activities. Furthermore, the dormitory’s close

proximity to the Friendship Recreation Center will enhance access to additional community resources. Together, these features will create a vibrant, accessible environment that fosters both personal and professional growth for students and the surrounding community.

5.6 Community

The proposed dormitory reflects a strong commitment to advancing community priorities through extensive engagement and responsiveness to community feedback. Between July 30, 2019, and April 11, 2024, a total of 18 Community Liaison Meetings and 20 ANC Meetings were held, providing ongoing opportunities for local residents to voice their concerns and suggestions. As a result of this community input, several significant adjustments were made to the project, including a reduction in the number of student beds and the building's height, as well as the rotation of the top floor to ensure that windowless units face the street. Additionally, the upper floors were redesigned with increased setbacks to improve the overall aesthetic and lessen the visual impact on the surrounding neighborhood. These changes demonstrate the project's alignment with community priorities, ensuring that the development is both responsive to local needs and integrated into the broader fabric of the neighborhood.

6 Conclusion

The Wesley campus plan represents a well-considered and equitable approach to institutional growth, aligning with the Comp Plan and the Zoning Commission's Racial Equity Tool. Through extensive community engagement, thoughtful planning, and sustainable design, the campus plan advances racial equity while addressing key priorities related to housing, displacement, access to opportunities, environmental sustainability, and community integration.

The plan's increase in student housing capacity, from 90 to 659 beds, ensures that the seminary can accommodate more students without displacing residents or contributing to rising housing costs in surrounding neighborhoods. Additionally, by providing on-campus housing, the project helps to alleviate pressure on local rental markets, supporting the city's broader goal of housing affordability.

Through green infrastructure investments, including a LEED Gold-certified building, bioretention facilities, permeable surfaces, and tree preservation, the project demonstrates a commitment to environmental stewardship. Public space enhancements, such as streetscape improvements and a new neighborhood playground, further reinforce the project's positive impact on the community.

The project's proximity to transit and employment centers ensures that students will have greater access to jobs, services, and amenities, contributing to a more connected and inclusive urban environment. Additionally, Wesley Seminary's role in training students for religious and social service careers strengthens the District's workforce, particularly in sectors that support underserved communities.

Importantly, the comprehensive community engagement process, which included 18 Community Liaison Meetings and 20 ANC Meetings, has led to significant design modifications that reflect neighborhood input. Adjustments such as reducing building height, increasing setbacks, and reorienting top-floor units demonstrate the seminary's responsiveness to community concerns and its commitment to thoughtful development.

Overall, Wesley's campus plan effectively balances institutional needs with community priorities, environmental sustainability, and racial equity considerations. By expanding student housing, improving public spaces, and fostering inclusivity, the project serves as a model for equitable development, ensuring that growth is both responsible and beneficial to the broader community.