



MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Stephen Cochran, Development Review Specialist
Jennifer Steingasser, Deputy Director, Development Review and Historic Preservation

DATE: June 3, 2022

SUBJECT: ZC 22-13 – Wesley Theological Seminary Campus Plan 2022-2032

I. SUMMARY RECOMMENDATION

The Wesley Theological Seminary (“Wesley” or “the Seminary”) requests approval of a special exception application for the Wesley Theological Seminary Campus Plan 2022-2032 (the “Campus Plan”), pursuant to Subtitle X §§ 101. This is Wesley’s second campus plan.

The intent of the proposed plan is to enhance Wesley’s ability to continue providing Master’s and Doctoral-level education for graduate-level students studying theology and related subjects. The primary source of the funds to achieve this would be revenue from a ground lease enabling a private company to construct a new 219-unit, 659-bed dormitory that would be occupied primarily by American University students and their immediate families.

Under the new plan the campus would remain a compact cluster of buildings, relatively well-screened from adjacent residential areas and with a publicly accessible green periphery on three sides. Two existing dormitories, the “President’s House” and a surface parking lot would be demolished. Proposed for new construction are a seven-story dormitory with underground parking, a two-story faculty/administration/maintenance building, and a neighborhood playground., all of which would be reviewed at Further Processing. While the cap on student enrollment would remain the same (715), there would be net increase of 569 beds and 197 to 227 parking spaces. Traffic circulation would remain essentially the same as under the existing plan. There would also be enhancements to landscaping and support facilities.

The Office of Planning (OP) **recommends the Zoning Commission approve** the Wesley Theological seminary campus plan for 2022-2023, subject to the 46 Conditions filed by the Applicant in Case Exhibit 12A7, which is attached as Appendix I to this OP report, and subject to the following additional or modified Conditions (deletions ~~struck through~~, additions underlined):

- Proposed New Condition 47: The applicant shall be responsible for the construction of the University Avenue sidewalk and ADA-compliant pedestrian ramps recommended in the District Department of Transportation’s (DDOT’s) report on this application.
- Proposed New Condition 48: The Zoning Administrator having determined that Subtitle C § 1001.6 (c) does not exempt penthouse habitable space in the proposed new dormitory from the

requirements of Subtitle C § 1507, at Further Processing of the proposed new dormitory the applicant shall demonstrate how these requirements will be met.

- Proposed Modified Condition 14: The New Dormitory will be developed on Lot 819 after Further Processing, in substantial accordance with the plans attached as Exhibit ¹.

The New Dormitory will house only enrolled Wesley students (and their immediate families) and American University students not otherwise required by the American University campus plan to be housed on the American University campus (and those American University students’ immediate families, if any), resident management personnel and student resident assistants/ambassadors. Seminary students will be given first priority for housing in the New Dormitory.

“Immediate families” are defined for this plan as the spouses or domestic partners, and dependent children under the age of 18 living in the same apartment unit as the enrolled Wesley students and American University students who are residing on the campus.

The New Dormitory will be constructed in accordance with a long-term (99-year) ground lease between the Seminary and Landmark Properties. During the term of the ground lease, use of the site is strictly limited to “first-class student housing” (including small “Grab and Go” provided in Condition 16, below) and no other purpose. At the conclusion of the ground lease, ownership of the improvements will revert to the Seminary.

Prior to the hearing, the applicant should verify that those residing or working on the Wesley campus will have access to the American University shuttle to and from the Tenleytown Metro station.

OP encourages the applicant to include measures that move the campus towards operational carbon-neutrality.

II. APPLICATION-IN-BRIEF

Proposal	2022-2032 Wesley Theological Seminary Campus Master Plan	
Location	Washington Theological Seminary 4500 Massachusetts Ave. N.W.	
Legal	Square 1600; Lots 6 (A&T Lots 818, 819), 7, 8 and 9	
ANC	Ward 3, ANC-3D (future ANC 3E)	
Zoning	RA-1	
Site	381,787 SF (8.77 acres)	
Buildings	Existing: 11, including maintenance facilities	Proposed: demolish 4, construct 2 = 9
FAR	Zone Permits: 1.8 (687,216 SF)	Campus Plan Permits: 0.64 (245,000SF)
	Existing: 0.55 (210,000 SF)	Proposed: 1.1 FAR (417,203 SF)
Max. Height	Campus Plan Permits & Existing: 25’-40’ in 2-4 stories (excluding chapel tower)	
	Proposed: one @75’5” (7 stories) rest @ 25’- 40’ (2 - 4 stories) (excluding tower)	

¹ Exhibit reference not supplied in applicant’s proposed Conditions.

Beds	Campus Plan Permits: 172 (87 non-Wesley graduate students among 3 dormitories)	Proposed: 735 (~650 AU students & immediate families in only new dorm, 0 in remaining 2014 dorm)
	Existing: 166	
Enrollment & FTE's	Campus Plan Permits: 715 FTE's	Proposed: 705 total for full-time or part-time enrolled students taking courses on campus.
	Existing: Less than cap. See Exhibit 12 B for details.	
Faculty	Campus Plan Permits: no more than 110	Proposed: No more than 100 faculty & other staff plus no more than 12 non-Wesley personnel hired by Landmark for proposed ground-leased dormitory
	Existing: 31 full-time faculty and 69 others, including part-time faculty total faculty and full and part-time staff	
Other Staff	Campus Plan Permits: See above	Proposed: See above
	Existing: See above	
Parking	Campus Plan Requires: at least 150	Proposed: 300-350 in garage, plus 31 on internal roads = 331-381 spaces). 103 reserved for Wesley students and staff.
	Existing: 174 (143 in lot; 31 on internal roads)	
Open Space Buffer	Campus Plan Requires: at least 170 feet between University Ave and dorm constructed in 2014. Existing: Same as above	Proposed: Further landscape the 55% of the campus that is open space. New 2-story faculty/administrative/maintenance building would be 105 feet from University Avenue.

The principal objective of the 10-year plan is to maintain and enhance the programs and facilities for Wesley students by generating revenue from the leasing of a portion of the campus for a new dormitory for rental primarily by non-Wesley students. The applicant's Pre-Hearing Statement (Exhibit 12) contains 46 Proposed Conditions summarizing the proposals, limits and permissions for which permission is sought under the proposed campus plan. The major points include:

- Limit to 705 the number of full or part-time resident or non-resident Wesley students taking classes in-person at the Spring Valley campus.
- Demolish:
 - Straughn Hall and Carroll Hall - two 3-story 60-year-old dorms with 90 beds total
 - a surface parking lot with 143 spaces,
 - the former "President's House" near University Avenue
 - a small one-story maintenance building adjacent to the surface parking lot.
- Lease ground on Lot 819 in the southern section of the campus, adjacent to American University ("AU"), to Landmark Properties, a developer of student housing, for the construction of a seven-story, 75'8" tall, 659 bed dormitory with 305,157 gross square feet.
- The seven-story dormitory will have:
 - 659 beds in 210-215 units ranging from studios to 5-bedrooms with communal spaces;
 - Possibly include 500 SF devoted to convenience retail serving only those residing or working on campus, and with no external signage (consideration in Further Processing); and

- LEED Gold with solar panels and green roof (both to be specified in further processing).
- Number of Dormitory Beds on Campus and Their Occupancy:
 - Increase beds from permitted 172 to proposed 735
 - Permit Wesley students and immediate families to rent beds in both the remaining dormitory constructed in 2014 and the proposed new dormitory
 - Permit American University students and their immediate families, but no other non-Wesley students, to rent beds only in the proposed new dormitory
 - Eliminate existing restriction that rental to AU students be limited to AU graduate students
 - Eliminate current cap on the number of beds occupied by AU students, provided all Wesley students desiring beds are accommodated.
- Subject to Further Processing, construct a two-story 5,275 SF Administration / Faculty / Maintenance building, which would be residential in appearance.
- Replace 143-space surface parking lot with a 300-350 space underground garage beneath the proposed new dorm.
- Enhance the landscaping of the 210,000 SF (55% of the campus) that would remain as open space, and possibly build a community playground, subject to Further Processing, on a portion of that space.
- Prohibit campus residents from being eligible for DC Residential Parking Permits.
- Retain the existing traffic circulation system, with the refinements to the current limitations on the timing of the use of the University Avenue access point, as described in Proposed Conditions 24 – 31 (Exhibit 12A7).
- Abide by the Construction Management Plan summarized in Proposed Conditions 32 – 34.
- Coordinate oversight of student conduct of non-Wesley residents with The American University as noted in Proposed Conditions 27 and 46.
- Maintain the community liaison committees, as in Proposed Condition 40. Continue the current structure of campus-community committees and consultation, including a construction management committee, and a neighborhood liaison consultation group for the final landscape plan.
- Report the outcome of the review of a construction stormwater plan to the ANC and the Community Liaison Committee and work with that committee on preventative measures.
- Ensure that all funding sources are in place prior to starting construction of a building.

- Support ANC 3D’s request to DDOT for a sidewalk on the Wesley side of University Avenue, preferably using permeable pavers.²
- Screen the existing exhaust pipes on the to-be-retained 2014 Residence Hall.
- Permit the possible inclusion in the proposed new dormitory of an approximately 500 square foot “retail space providing student conveniences and limited food items for the residents and Seminary students”, subject to review on size, location, hours of operations, and patronage at further processing.
- Resolve the following at Further Processing:
 - Refinements to the design of the two proposed new buildings
 - Consideration of possible 500 SF retail space in proposed new dorm
 - Development of CCTV security system
 - A design and location for an approximately 3,800 square foot neighborhood playground within Lots 7, 8 and 9 fronting on University Avenue. The playground would be open to the neighborhood, fenced, and operate only during daylight hours

III. SITE AND SURROUNDINGS DESCRIPTION

Other than leased space near Mount Vernon Square area, the area covered by the proposal is the Seminary’s sole campus. It is in northwest Washington, just north and west of the intersection of Massachusetts and Nebraska Avenues at Wesley Circle. The 8.77-acre site is essentially diamond-shaped and bounded by the arterial Massachusetts Avenue on the northeast, The American University’s (AU’s) main campus on the southeast and southwest, and the local street University Avenue on the northwest side.

AU’s high-rise dormitories and playing fields are adjacent to the southeastern and southwestern sides of the Seminary’s campus. There are single-family houses to the northeast, across and well set-back from Massachusetts Avenue. The more proximate residential area is a single-family detached neighborhood on the campus’ northwestern side, down-hill and across University Avenue from the campus’ existing and proposed buildings.

IV. 2006 CAMPUS PLAN AND SUBSEQUENT APPROVALS

The existing campus plan was a first approved in 2006 as ZC 05-40. If provided for a 715-student enrollment cap, 72,500 square feet of new development (including the replacement of two older dormitories with two new dormitories), an expansion of student bed capacity from 160 to 220, the construction of a new library and other academic facilities, the expansion of the chapel, the retrofitting of an existing building as a campus center, and the replacement of a surface parking lot with an underground facility topped by a landscaped quadrangle. However, declining enrollment, reduced funding and changing approaches to theological education led to scaling back these plans.

² DDOT has conditioned its recommendation on the applicant’s being responsible for this item. OP recommends this to the Commission as a condition of approval.

ZC 05-40A reduced the number of approved new buildings to one and the maximum square footage to 245,000 GSF, of which 210,000 GSF exists. Orders ZC 05-40A through ZC 05-40D maintained the reduced the number of planned new buildings, extended the plan to June 30, 2022 and incrementally increased the permission for non-Wesley graduate students to occupy a total of 76 of the beds on campus. Under the current campus plan the Seminary constructed the New Residence Hall dormitory in 2014, renovated other buildings, improved campus infrastructure and leased beds to non-Wesley graduate students. However, all Orders maintained the 715-enrollment cap.

V. EXISTING CAMPUS PLAN

The campus was constructed in 1958-59. Since then, one new building has been constructed, under the campus plan approved in ZC 05-40. The existing campus is illustrated below in Figure 1.

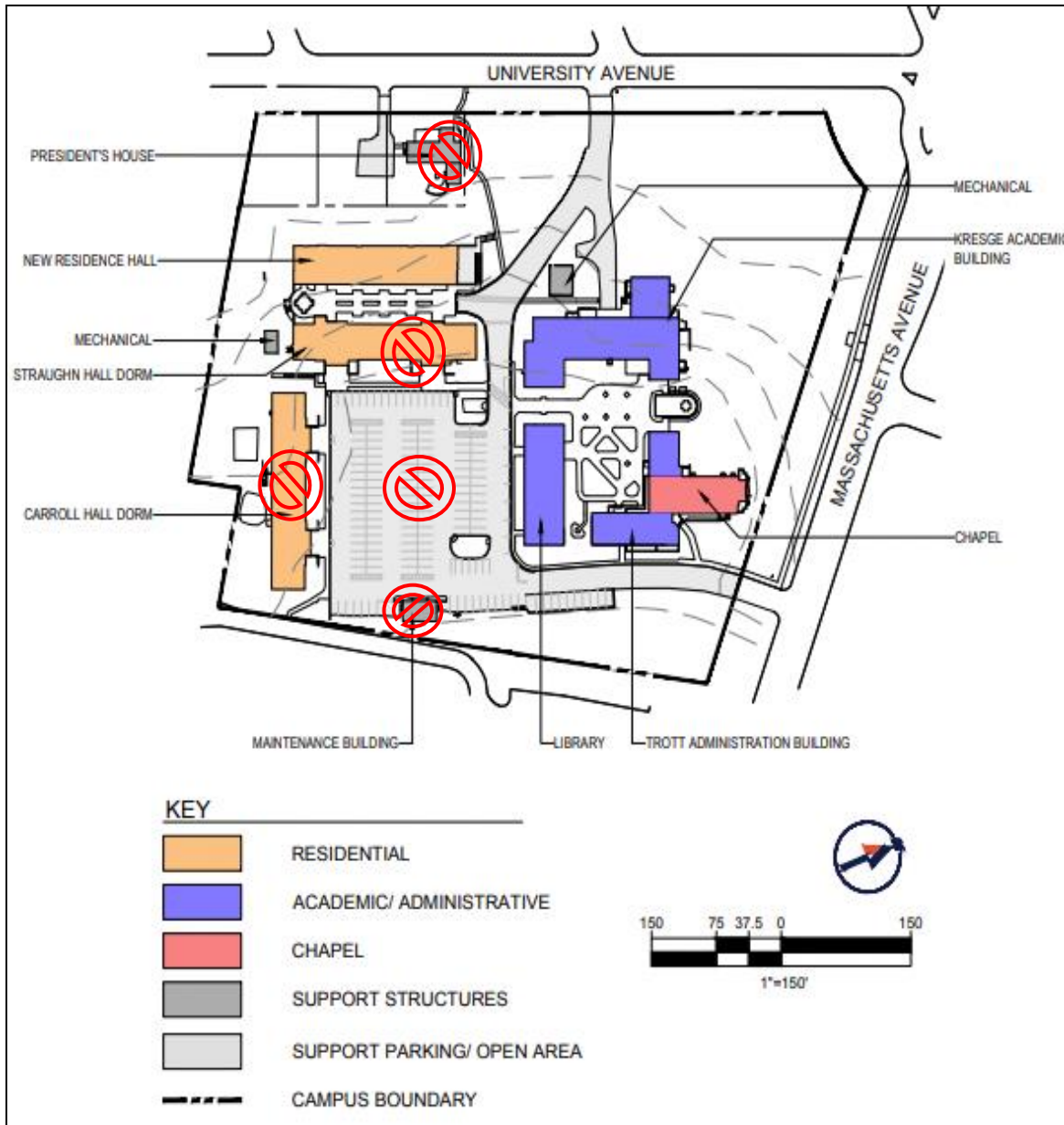


Figure 1. Existing Campus Null sign (X) indicates a building or facility proposed for demolition under proposed campus plan.

With the exception of the former President’s House, for which demolition is planned under both the current and proposed campus plans, the existing buildings are set back at least 170 feet from University Avenue, with most clustered towards the south, atop a wooded hill that slopes down to the single-family homes across University Avenue, and also down towards Massachusetts Avenue. This enables there to be a significant landscaped buffer between the principal part of the campus and the single-household residences on the opposite side of University Avenue.

The built portion of existing campus comprises two back-to-back areas at the top of the hill and two buildings on the hill’s slope. Towards Massachusetts Avenue is a quadrangle bordering a pedestrian courtyard. The quadrangle is devoted to classroom, administrative, chapel and library uses. It is

landscaped and is accessible only to pedestrians. The quadrangle's buildings would remain under the proposed plan.

West of the quadrangle the 3-story Carrol Hall and Straughn Hall dormitories form an inverted "L" bordering a 143-space surface parking lot. The back of the library also borders the parking lot. Straughn and Carroll Halls and the parking lot would be demolished the under the proposed campus plan to make room for a seven-story dormitory and underground parking garage.

On the slope of the hill facing University Avenue is the "New (2014) Residence Hall", located to the north of and behind Straughn Hall. This is the only building constructed under the existing campus plan and would remain under the proposed plan. While the New Residence Hall starts from a lower elevation than Straughn Hall, its 4-story height brings it to approximately the same elevation as Straughn Hall. Further down the hill, towards University Avenue is the former President's House, which would be demolished under the proposed plan.

The overall site has access points from both Massachusetts Avenue and University Avenue, with the former being used primarily for autos and the latter for loading and delivery.

VI. THE PROPOSED 2022-2032 CAMPUS PLAN

As noted, the proposed campus plan seeks to ensure the Seminary's ability to continue providing Master's and Doctorate education to theology students by developing revenue sources to:

- retain or enhance existing academic programs and enrollment;
- maintain the buildings that have been either recently constructed or renovated;
- provide for on-campus housing for Wesley students desiring it, as well as for their immediate families, if desired; and
- provide for the needs of non-resident students Wesley, and Wesley faculty and staff.

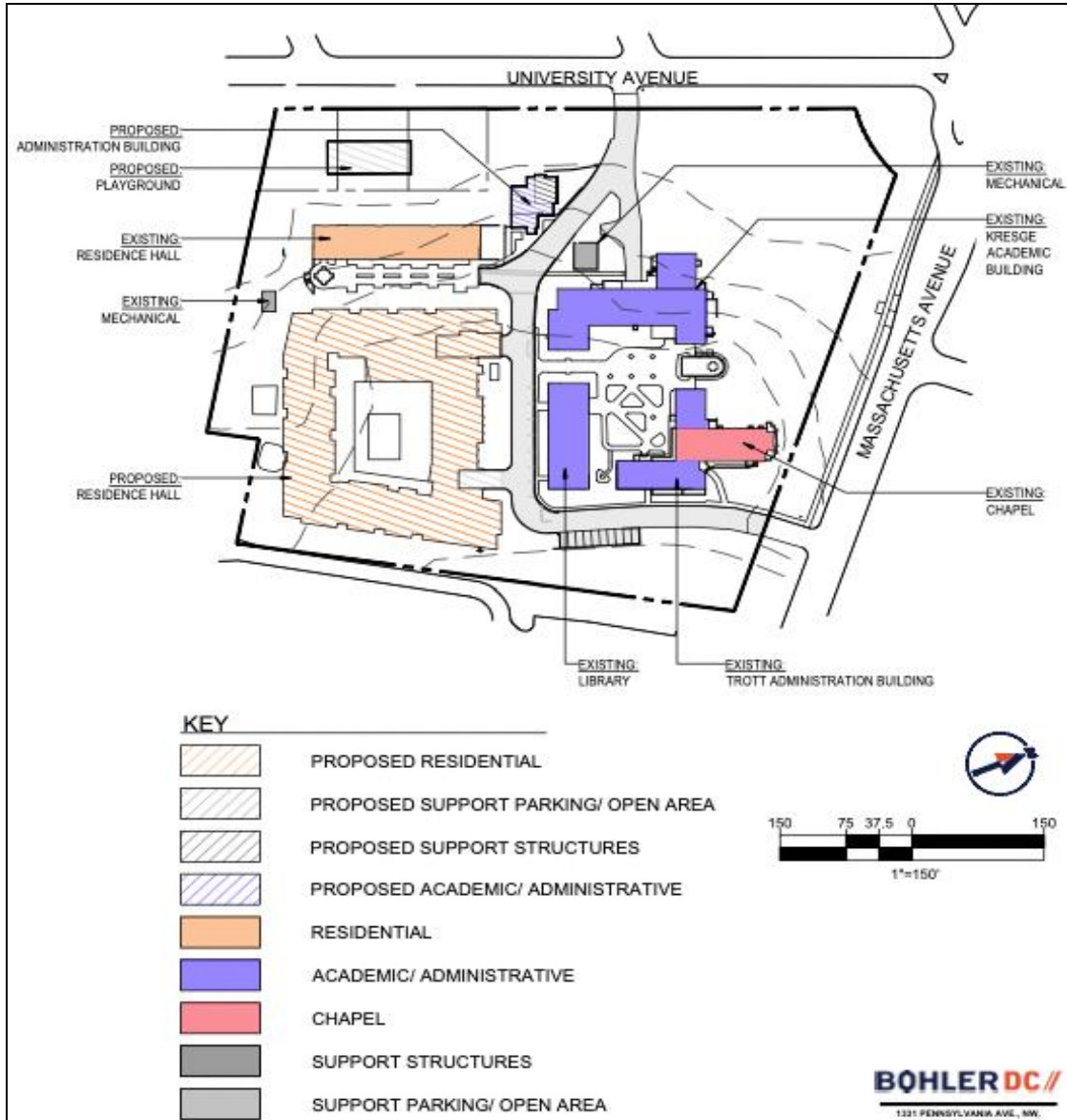


Figure 2. Proposed Campus Plan (case exhibit V ___). Proposed new construction is striped. Residences in the new dormitory would reflect current apartment-style co-living trends in campus housing.

Current and Proposed Development of Wesley Theological Seminary Campus					
Total Campus Site Area: 381,878 SF					
BUILDING	Use	EXISTING SF	PROPOSED SF	EXISTING BEDS (Actual)	PROPOSED BEDS
Straughn Hall	Dormitory	29,866	(28,866)	~45	See below
Carroll Hall	Dormitory	27,533	(27,533)	~ 45	(90) between both dorms
Old President House	Storage	4,538	(4,538)	--	--
Library	Academic	16,630	16,630	--	--
Trott Hall / Chapel	Academic/ Religious	26,195	29,195	--	--

Kresge	Academic	32,819	32,819	--	--
Existing “New” (2014) Residence Hall	Dormitory	29,195	29,195	76	76
Proposed New Faculty/Admin./ Maintenance Building	Admin.	--	5267	--	--
Proposed New Dorm (On 113,758 SF Lot 6)	Dormitory	--	306, 957	--	659
Total SF		166,916	417,201	166	735
FAR (RA-1 permits 1.8)		0.44	1.09		

Further Discussion of Bed Count, The Proposed New Dormitory and the Retention of One Existing Dormitory

The proposed plan seeks to develop an enhanced revenue source in the form of a new student residence hall that would serve Wesley students, but that would be rented primarily by non-Wesley students.

The Seminary would lease the land now occupied by Straughn and Carrol dormitories and the parking lot between them to Landmark Properties, a private company with experience in developing apartment-type student dormitories. Landmark would make an initial lump sum payment to Wesley, demolish the existing dorms and parking lot, and construct a 305,157 square foot, seven-story-plus-occupied penthouse residence hall with 659 beds, organized into 210 studio to five-bedroom co-living residential units. The building would have many communal amenities, and a 300-350-space underground parking lot.

Landmark would be responsible for developing and managing the new building. Based on information provided by the applicant it appears that approximately 550 of the 659 beds in the new dorm would be rented to AU-enrolled students and their immediate families. Wesley would, in turn, receive ongoing payments from Landmark Properties to help fund Wesley’s educational mission and the maintenance of its facilities.

The proposed plan would permit an enrollment of 705 full or part-time students on the Spring Valley campus, which would be less than the existing 715 Full-Time-Equivalent cap on student enrollment at Wesley. Wesley students would be given priority in the rental of beds in both the existing and the proposed dormitories. While the existing campus plan contains an upper limit on the number of beds that can be rented to AU graduate students, the new plan does not propose a cap on the rental of beds to AU students or their immediate families.

There is not an agreement between AU and the Seminary about the development or use of the proposed new dormitory³, but the applicant has concluded⁴ that there is a sufficient market of AU students and their immediate families to fill the beds not occupied by Wesley students.⁵

The new dormitory building would be LEED-Gold mid-rise residential and would contain solar panels and a green roof. The applicant is requesting Commission review of the building's size, use and general massing in this application and would return to the Commission for design, retail space and sustainability details at Further Processing. There is an obvious synergy between these two campuses and the opportunity for co-use of the proposed new dormitory. Subject to the conditions that the tenants be limited to Wesley and American University, OP does not object to the proposal.

The existing dorm that was built in 2014 under the current campus plan would remain (labelled Residence Hall in Fig.1 and Existing Residence Hall in Fig. 2). Under the proposed plan it would be occupied only by Wesley students and their immediate families. The current campus plan permits some AU graduate students to live in the building. The 2014 residence hall would not be ground-leased to Landmark.

The Proposed Faculty/Administrative/Maintenance Building

This would be a two-story 5,267 SF building designed in a residential style. It would accommodate space for faculty and administrative offices, and its lowest level would contain the maintenance facilities that would be relocated from the current location adjacent to "New" (2014) dormitory. The building would be located on the downward slope of the hill ending at University Avenue, approximately 105 feet from that street.

Green Buffer

55% of the campus would remain undeveloped. The existing buffer along Massachusetts Avenue and the over 200-foot-deep buffer at the corner of Massachusetts Avenue and University Avenue would be retained. The currently 170-foot buffer along University Avenue would be altered by the demolition of the existing President's House in favor of a neighborhood playground and by the construction of the faculty/administration/maintenance building. The new building would be at least 105 feet from University Avenue.

Other than the playground, after the President's House is demolished no other construction on Lots 7,8 and 9 is planned.

Community Amenities

The existing community access to the open campus and its extensively landscaped grounds would be maintained. The Seminary would continue to hold services, talks, small concerts open to the public. The proposed new playground near the to-be-demolished President's House would be

³ Case Exhibit 3, page 34 of 65

⁴ "WTS Housing Demand Analysis" provided to OP on May 17, 2022.

⁵ The report states the market would include 2,681 AU undergraduates who will not be housed on-campus under the AU campus plan or by the 3,116 full-time AU graduate students. The report does not indicate how these numbers were derived nor does it reflect that the new AU campus plan requires that all undergraduates be housed on the AU campus.

designed in conjunction with the neighborhood and would be open to neighborhood residents during daylight hours.

Sustainability

The new dormitory would be designed to LEED Gold mid-rise residential standards and the faculty/administration/maintenance building would be design to LEED Gold new construction standards. The new dorm would have a green roof and solar panels, with details on the size of these installations to be provided during Further Processing.

The campus upgraded its infrastructure to improve its sustainable performance during the existing campus plan. OP and DOEE have encouraged the applicant to explore ways to move the environmental performance of the campus to closer to carbon-neutrality as part of longer-range sustainability goals but recognize this would be difficult to achieve on a campus with a preponderance of existing, recently-renovated buildings.

The Department of Energy and Environment (DOEE) has provided OP with additional sustainability comments, which are attached as Appendix II to this report.

Transportation, Circulation and Loading

At the time OP completed this report the applicant had not uploaded the Comprehensive Transportation Review (CTR) for the proposed campus plan into the case file. However, the CTR had been reviewed by DDOT prior to the completion of OP's report. DDOT will provide a separate report to the case file that analyzes the CTR.

Prior to the completion of this OP report, DDOT staff informed OP that it has no objections to the CTR or the Transportation Demand Management's (TDM's) proposed measures other than the need for the applicant to construct the sidewalk and ADA ramps on the Seminary side of University Avenue. This comment is reflected in the additional Condition 47 OP recommends in the first section of this report.

As summarized in the applicant's proposed Conditions 24-31 and in the applicant's preliminary statement, the applicant would, under the proposed plan:

- Unbundle parking charges from the lease of dormitory space and price parking at the market rate average within a quarter mile, which – since there are no commercial parking garages within ¼ mile -- would, presumably, take into account parking charges at AU and for metered on-street parking;
- Offer no free, discounted or validated parking, or offer rates for no term longer than a month;
- Identify transportation coordinators for all stages of construction and operations;
- Annually inform goDCgo of employee commuting patterns;

- Provide various transit, carpooling and other information to dormitory residents;
- Provide at least the 62 long-term and 12 short-term free bicycle spaces required by the zoning regulations, and storage rooms for a variety of bicycle types. The proposed plan meets minimum parking requirements and includes all required long-term and short-term bicycle spaces. There is already a bike-share facility on the campus.
- Provide a free SmartTrip card to new residents and a coupon for a Capital Bikeshare ride.

The vehicular circulation system is essentially the same as under the current plan, but with additional restrictions on use of the University Avenue access point. While delivery and maintenance vehicles would enter and exit from University Avenue and would be restricted from left turns upon exiting, the proposed plan would restrict all such access or exiting during morning and evening peak traffic hours. Other vehicles (such as private vehicles, ride-share, etc.) would enter and exit from Massachusetts Avenue, as under the current plan.

The applicant states that loading requirements will be met and that both the location of and the operation of the loading facilities have been planned to minimize any noise spillage into the nearby neighborhood.

OP has also asked the applicant to clarify the access that campus residents and employees would have to the AU Tenleytown Metro shuttle. Access is mentioned in the Applicant’s Statement but is not included as a proposed Condition.

VII. THE PROPOSED CAMPUS PLAN AND THE COMPREHENSIVE PLAN

A. The Campus Plan and Comprehensive Plan As Viewed Through a Racial Equity Lens

The Implementation Element calls for “*the Zoning Commission to evaluate all actions through a racial equity lens as part of its Comprehensive Plan consistency analysis*”^{2501.8}. Achieving equity and more specifically racial equity, requires a broad range of policies and tools, some of which fall under the zoning authorities granted to the Zoning Commission and some of which do not. Zoning Commission actions are land use focused, but the broader equity goal includes public policies, budget investments, civic improvements and social services which are beyond the scope of the Zoning Commission.

The direction to consider equity “as part of its Comprehensive Plan consistency analysis” indicates that the equity analysis is intended to be based on the policies of the Comprehensive Plan and part of the Commission’s consideration of whether a proposed zoning action is “not inconsistent” with the Comprehensive Plan, rather than a separate determination about a zoning action’s equitable impact.

The scope of evaluation of “all actions through a racial equity lens” varies depending on the type of zoning action before the Commission and what aspects of the outcome the Zoning Commission can control. Equity is conveyed throughout the Comprehensive Plan, particularly in the context of zoning, where certain priorities stand out. These include affordable housing, displacement, and access to opportunity.

A campus plan is a land use plan and its approval is required when the institutional use is proposed in residential zones. This proposed Campus Plan is not inconsistent with the Comprehensive Plan as analyzed through a racial equity lens. The site was essentially undeveloped when purchased by Seminary in the middle of the last century. At that time its most recent use had been as an experimental station and testing ground for the U.S. Army. The development of the vacant land for Seminary use occurred in 1958-59 and did not involve any displacement of residents.

The 2022 – 2032 Wesley Theological Seminary Campus Plan would provide housing to students and employment opportunities to residents. The proposed expansion of graduate student housing would help to relieve student demand on the District's housing supply. Approximately 34% of the Seminary's students are Black. 18% of the administration, 25% of the faculty, and 7% of other staff are Black.

While some of the student body pursue academic careers, most are trained for careers in service to others. In addition to becoming pastors at congregations such as Shiloh Baptist and Metropolitan Baptist, Ebenezer A.M.E., Foundry Methodist and others, seminary graduates serve as leaders in a range of non-profit organizations. The Seminary actively engages its graduates in virtual and in-person training to advance community engagement skills and provides real time assistance to events promoting racial and social justice, such as the upcoming Poor People's Campaign June 18 march. It also runs an internship program placing Wesley and other theological students as interns in churches throughout the District.

The revenues that would be generated by the proposed new dormitory would help the Seminary to continue providing these programs that promote racial equity.

B. The Future Land Use Map (FLUM) and the Generalized Policy Map

Both the Future Land Use Map (FLUM) and the Generalized Policy Map designate the campus plan area for institutional use. This designation is explained in the Comprehensive plan, "*...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...*" (225.22).

As a plan for an institution of higher learning the proposed campus plan is not inconsistent with the designation in either map.

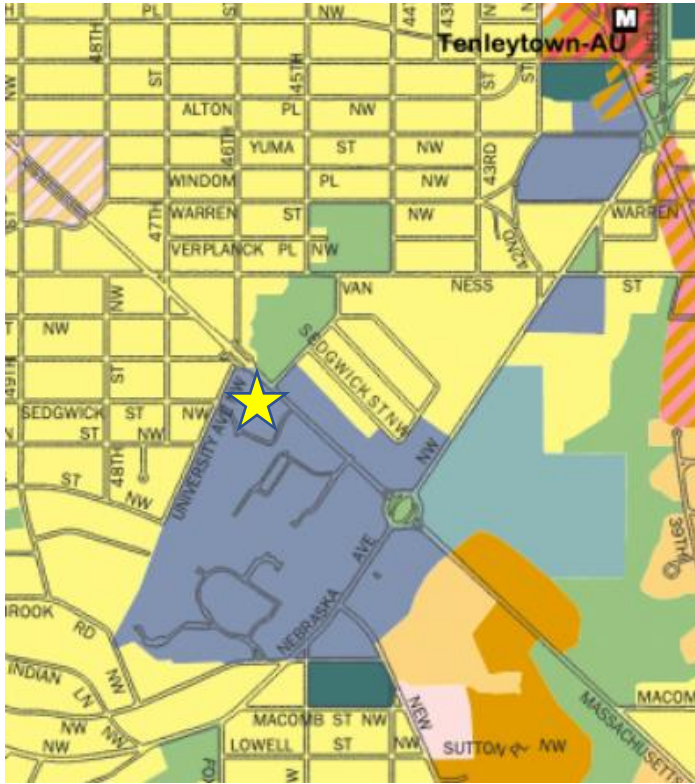


Figure 3. Generalized Future Land Use Map. (FLUM) Star indicates Wesley campus site. FLUM designation is Institutional (purple), as is the American University's designation to the south and the east. Low density residential (yellow) is to the northwest and northeast.

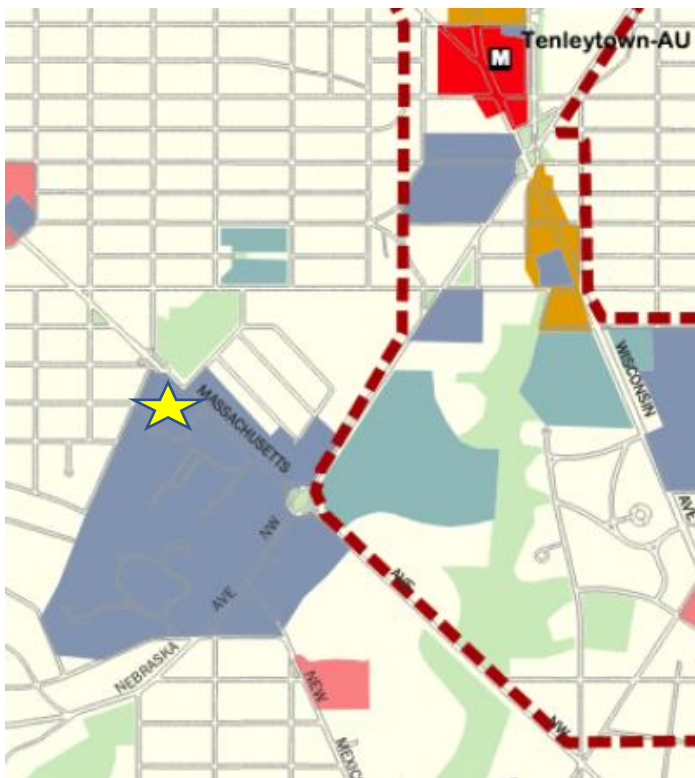


Figure 4. Generalized Policy Map. (FLUM) The yellow Star indicates Wesley campus site. Policy Map designation is Institutional (purple), as is the American University's designation to the south and the east. The residential areas are designated for neighborhood conservation.

C. Land Use Element

Policy LU-2.3.5: Institutional Uses

Recognize the importance of institutional uses, such as private schools, childcare facilities, hospitals, churches, and similar uses, to the economy, character, history, livability, and future of Washington, DC and its residents. Ensure that when such uses are permitted in residential neighborhoods, their design and operation is sensitive to neighborhood issues and neighbors' quality of life. Encourage institutions and neighborhoods to work proactively to address issues, such as transportation and parking, hours of operation, outside use of facilities, and facility expansion. 312.7

Policy LU-3.3.1: Transportation Impacts of Institutional Uses

Support ongoing efforts by institutions to mitigate their traffic and parking impacts by promoting ridesharing, carpooling, public transportation, shuttle service and bicycling; providing on-site parking; and undertaking other transportation demand management measures. 317.7

Policy LU-3.3.3: Nonprofits, Private Schools and Service Organizations

Plan, design, and manage large nonprofits, service organizations, private schools, seminaries, colleges and universities, and other institutional uses that occupy large sites within residential areas in a way that minimizes objectionable impacts on adjacent communities. Expansion of these areas should not be permitted if the quality of life in adjacent residential areas is significantly adversely impacted. 317.9

The Wesley Theological Seminary Campus Plan would be not inconsistent with the Land Use Element of the Comprehensive Plan. During their planning process, the Seminary has worked proactively with the neighboring residential community, and has responded by, most notably, reducing the height initially proposed for the new dormitory and providing additional setbacks for its upper stories. The applicant is still exploring design changes to minimize any potential light-spillage issues.

The campus plan includes other measures to minimize potentially objectionable impacts on the adjacent community. Foremost is enhanced landscape buffering along the campus perimeter, clustering new housing as far away from the residential neighborhood as possible, and working with the community to construct a neighborhood-oriented playground adjacent to University Avenue, if desired by the neighborhood.

The Land Use element encourages schools to provide alternative transportation options to mitigate traffic and parking impacts. The proposed measures are included in the CTR reviewed by DDOT and evaluated in its report.

D. Transportation Element

Policy T-1.1.8: Minimize Off-Street Parking

An increase in vehicle parking has been shown to add vehicle trips to the transportation network. In light of this, excessive off-street vehicle parking should be discouraged. 403.14

Policy T-5.2.2: Charging Infrastructure

Encourage early deployment of EV charging stations at no charge in appropriate, publicly accessible locations across the District to serve existing neighborhoods. Consider the integration of EV charging stations in new and existing residential and commercial developments. Consideration should also be given to locations where EV charging stations can be retrofitted into parking garages. As EVs become more popular, there will be increased demand for on-street charging stations, which will need to be balanced with other curbside needs and uses. 430.4

The proposed campus plan is not inconsistent with the Transportation Element of the Comprehensive Plan. The plan's transportation improvements promote bicycle, pedestrian, and, seemingly, shuttle bus usage. The plan enhances pedestrian pathways and adds long-term and short-term bicycle parking on campus. It is not clear whether the proposed underground garage would also include electric charging stations.

Policy T-1.1.8 and Policy EDU 3.3.5, encourage the provision of adequate parking on campus. The plan proposes to address both the transportation and the education element by increasing on-campus parking, (although providing it at a decreased student-bed to parking-space ratio than it does now), by de-bundling parking from dorm-room rental, by prohibiting student, faculty and employee parking on residential streets, and by further measures encouraging the use of mass transportation and alternatives to private vehicles.

E. Environmental Protection Element

Policy E-2.1.2 Trees Requirements in New Developments

Use planning, zoning, and building regulations to promote tree retention and planting, as well as the removal and replacement of dying trees when new development occurs. Tree planting and landscaping required as a condition of permit approval should include provisions for ongoing maintenance. 605.6

Policy E-3.2.1: Support for Green Building

Encourage the use of green building methods in new construction and rehabilitation projects and develop green building methods for operation and maintenance activities. 614.2

Policy E-3.2.2 Net-Zero Buildings

Provide incentives for new buildings to meet net-zero energy design standards, as called for in Clean Energy DC and Sustainable DC 2.0. Establish a path to the phased adoption of net-zero codes between 2022 and 2026. The District's building energy codes should be updated again by 2026 to require that all new buildings achieve net-zero energy use or better. Prior to 2026, the District should provide incentives to projects that voluntarily seek to achieve net-zero energy use. 612.4

The proposed campus plan is not inconsistent with the Environmental Protection Element of the Comprehensive Plan. The school's well-maintained and wooded environment is a defining feature of the campus' character. 55% of the campus would remain as open space. Additional trees and other vegetation would be planted under the new plan. (See Landscape Plans, Exhibit 12 H-P,

pages 3 and 4 of 19). Additionally, what is now a surface parking lot would be replaced by a new building that would be LEED Gold mid-rise residential and the new faculty/administration/maintenance building would be LEED Gold new construction. These levels have become standard for new buildings on campuses. The plan notes there will be solar panels and a green roof on the new dormitory, but details about these measures will not be provided until Further Processing.

OP has also encouraged the applicant to consider ways for its new construction and overall operations to get closer to net-zero levels. However, as noted by DOEE, it would be difficult to achieve net zero in a campus plan where most of the buildings were constructed in the mid-20th century and are not planned for further renovations.

F. Education Element

Policy EDU-3.2.2: Corporate Citizenship

Support continued corporate citizenship among Washington, DC's large institutions, including its colleges, universities, hospitals, private schools, and nonprofits. This should include a continued commitment to high quality architecture and design on local campuses, expanded use of green building methods and low impact development, and the adaptive reuse and preservation of historic buildings. 1213.3

Policy EDU-3.2.4: Universities as Community Partners

Encourage universities to expand service-oriented partnerships that connect students with local communities and that can strengthen town-gown relationships. 1213.5

Policy EDU-3.3.1: Satellite Campuses

Promote the development of satellite campuses to accommodate university growth, relieve growth pressure on neighborhoods adjacent to existing campuses, spur economic development and revitalization in underinvested neighborhoods, and create additional lifelong learning opportunities for District residents. 1214.6

Policy EDU-3.3.3: Universities as Large Land Owners and Campus Plan Requirements

Continue to require campus plans for colleges and universities located in residential and mixed-use zone districts. These plans should be prepared by the institutions themselves, subject to District review and approval, and should address issues raised by the surrounding communities. Each campus plan should include provisions that respect neighbors and neighboring property and ensure that potentially objectionable impacts such as noise, traffic, number of students, or other similar conditions are addressed. 1214.8

Policy EDU-3.3.4: Student Housing

Encourage the provision of on-campus student housing in order to reduce college and university impacts on the housing stock, especially the affordable housing stock, in adjacent neighborhoods. Consider measures to address the demand for student housing generated by non-District institutions with local branches. 1214.9

Policy EDU-3.3.5: Transportation Impacts of Colleges and Universities

Support ongoing efforts by colleges and universities to mitigate their traffic and parking impacts by promoting ridesharing, carpooling, shuttle service, bicycling, scooters, skateboarding, and other transportation demand management measures. The provision of adequate on-site parking for institutional uses also should be encouraged. 1214.10

The campus plan is not inconsistent with the Education Element of the Comprehensive Plan. The seminary is an open campus, readily accessible to neighbors. The plan proposes expanding this access with a neighborhood-oriented playground. The seminary sponsors an internship program that brings students to work at various non-profit and community organizations throughout the District. Seminary students and graduates assist the mission of many churches in the District.

The new plan proposes to decrease the rental pressures that students place on private housing stock by developing dormitory space not only for Wesley students and their families, but also for American University students and their immediate families. These students and their families would otherwise be seeking market rate housing.

While the seminary does not have a secondary campus, it does rent space in the Mount Vernon Square area to facilitate student involvement with various non-profit and governmental organizations in central Washington.

As discussed in the transportation element section the school intends to improve the pedestrian, bicycle, and shuttle transportation on campus.

G. Economic Development Element

Policy ED-1.1.1: Core Industries

Continue to support and grow the District's core industries, particularly the federal government; professional, scientific and technical services; religious, grantmaking, civic professional, and similar organizations; postsecondary education; accommodation and food services; health care and social assistance; and administrative support services. 703.12

Policy ED-2.4.1: Institutional Growth

Support growth in the higher education and health care sectors. Recognize the potential of these institutions to provide employment and income opportunities for District residents, and to enhance the District's array of cultural amenities and health care options. 710.4

The campus plan is not inconsistent with the Economic Development Element of the Comprehensive Plan. The revenues developed under the proposed campus plan would allow the school to remain open and continue providing employment and other opportunities to District residents.

H. Rock Creek West Area Element

Policy RCW-1.1.8: Managing Institutional Land Uses

Institutional land uses in the Rock Creek West Planning Area should be harmonious with surrounding uses, and potential adverse effects on neighboring properties should be minimized when institutions seek expansion. Redevelopment of institutional land should be

compatible with the physical character of the community, the changing nature of the District, and not inconsistent with provisions of the Comprehensive Plan and the underlying zoning rules and regulations. Densities and intensities of any future development on such sites should reflect input from the local community, accommodating student housing on campuses and future infrastructure needs. 2308.9

This campus plan is not inconsistent with the Rock Creek West Area Element This campus plan is proposing more, and taller, development than in the previously approved plan and its modifications. However, the proposed construction should be relatively harmonious with the nearby neighborhood and the adjacent American University.

The new dormitory would be in the same location as approved was approved for new construction in the earlier plan. While at least 35 feet taller than other buildings on campus – other than the chapel tower – it would be set back from the nearby neighborhood by at least 300 feet and would be less tall than the nearby American University dormitories The design and materials of the new dormitory would be congruent with the buildings that would remain on campus. As shown in illustrations in the case file, the combination of the existing four-story 2014 dormitory to the north and the additional landscaping should help to reduce the visual impact of the proposed dormitory when viewed from the neighborhood to the north, particularly during warmer-weather months.

While the proposed faculty/administration/maintenance building would be approximately 65 feet closer to University Avenue than the existing 2014 dormitory, this would be somewhat balanced by the demolition of the existing Old President’s House, which is even closer to University Avenue. The proposed building has been designed in a residential vernacular congruent with the neighborhood, would be only 2 stories tall, and would respect the existing topography by stepping down the hill. This building would also be screened with additional landscaping.

The school also worked with the community and incorporated their input into the shaping of the both proposed buildings and the landscaping. In further processing the applicant would continue working with the neighborhood to refine the design of both buildings and the landscaping.

The proposed plan would increase the number of beds on campus by approximately four-fold and would double the number of parking spaces. The potential impact should be mitigated by the following:

- There would be no increase in enrollment on the campus. The increase would be in the number of beds on campus. With the preponderance of beds being rented to American University students or their families, most pedestrian circulations would be between the Wesley campus and the American University campus to the south rather than to the residential neighborhoods to the north or east.
- With the increase in the number of parking spaces being proportionately less than the increase in beds; with the prohibition on residential parking permits for those living or working on campus; with the additional restrictions on delivery movements; and with general vehicular traffic being restricted to the Massachusetts Avenue access point, the CTR and DDOT’s analysis indicates that the impact of the additional population on campus and additional vehicular storage should not be excessive.

Further analysis is contained in the DDOT report on the proposed plan.

VIII. ZONING REGULATIONS REVIEW STANDARDS FOR CAMPUS PLANS

Subtitle X § 101 of the Zoning Regulation outlines the standards for reviewing campus plans. The analysis of the campus plan elements and projects against these criteria are discussed below. Unless specified, the analysis refers to the entire campus and addresses specific impacts of certain project features.

101 CAMPUS PLANS

101.1 Education use by a college or university shall be permitted as a special exception subject to review and approval by the Zoning Commission under Subtitle X, Chapter 9 after its determination that the use meets the applicable standards and conditions of this chapter.

101.2 The uses shall be located so that they are not likely to become objectionable to neighboring property because of noise, traffic, parking, number of students, or other objectionable conditions.

Noise

The major campus buildings are concentrated at the top of the hill in the southern section of the campus. This is the section farthest from the residential neighborhood and closest to The American University campus. The proposed new dormitory would be the farthest building from private houses – 300 feet from University Avenue. The applicant states that loading facilities and operations systems would be designed to minimize noise. While the proposed new dormitory would have extensive communal facilities and amenities these would be located inside the building or inside a courtyard enclosed on all sides with 75-foot-high walls. These facilities should not result in a significant generation of noise outside of the building.

Upon completion of the plan there would be two buildings on the north slope of the hill facing University Avenue. These would be the existing “New” (2014) Residence Hall and the proposed Administrative/Faculty/Maintenance Building. The former already exists and would not likely generate more noise than it does now. The latter would not be for students or student activities, and would be occupied primarily during weekdays, and would not be likely to generate significant noise.

Wesley does not have many of the facilities or sponsor many of the activities that typically generate significant noise on campuses. There are no playing fields, amphitheaters, or field houses with their attendant lights, loudspeakers or scoreboards. Wesley does not sponsor athletic teams. The largest assembly hall is the chapel.

There is a possibility that noise may emanate from the neighborhood playground Wesley has offered to construct on the site of what is now the President’s House. The Seminary and members of the community are continuing discussions about the playground.

Traffic & Parking

The Wesley campus is located along Massachusetts Avenue, a major arterial. University Avenue functions as a local two-way street with two travel lanes.

The campus is well served by public transit, including busses along Massachusetts Avenue and busses along nearby Nebraska Avenue that also serve the Tenleytown Metro station. It seems that the AU shuttle system, which connects with the Metro, also serves the Wesley campus, but OP has asked the applicant to clarify this. A Capital Bikeshare station is located on the campus and there are multiple stations on the AU campus or adjacent streets. With respect to pedestrians, the campus is self-contained and has an internal pedestrian circulation system.

In the existing Campus Plan there are a total of 174 surface parking spaces, with 143 in a surface lot and 31 on internal campus streets. The proposed campus plan would increase the number of spaces to between 331 and 381, with all but 31 being in a garage under the new dormitory whose construction would eliminate the existing surface lot.

The proposed Transportation Demand Management Plan (TDM) (Exhibit 15A1 – 15A3) has been reviewed by the District Department of Transportation (DDOT), which will submit a separate report.

The draft TDM proposes to:

- Unbundle parking charges from the lease of dormitory space and price parking at the market rate average within a quarter mile, which – since there are no commercial parking garages within ¼ mile would, presumably, take into account parking charges at AU and for metered on-street parking;
- Offer no free, discounted or validated parking or offer rates for no term longer than a month;
- Identify transportation coordinators for all stages of construction and operations;
- Will annually inform goDCgo of employee commuting patterns;
- Will provide various transit, carpooling and other information to dormitory residents;
- Will provide at least the 62 long-term and 12 short-term free bicycle spaces required by the zoning regulations, and storage rooms for a variety of bicycle types.
- Provide a free SmartTrip card to new residents and a coupon for a Capital Bikeshare ride.
- While delivery and maintenance vehicles would enter and exit from University Avenue and would be restricted from left turns upon exiting, the proposed plan would restrict all such access or exiting during morning and evening peak traffic hours. (Exhibit 12 Q-Y, page 6 of 22)
- Other vehicles (such as private vehicles, ride-share, etc.) would enter and exit from Massachusetts Avenue, as under the current plan. (Exhibit 12 Q-Y, page 6 of 22)
- Prohibit campus residents, employees or other students from obtaining residential parking permits and require these groups and visitors to park either on-campus or at metered public spaces.

The previous campus plan had initially required annual reporting on campus-related traffic and parking. The Zoning Commission permitted this to be suspended as long as the

enrollment remained below 550 students. While Wesley enrollment would not be likely to increase under the proposed plan, there would be an increase in the number of beds beyond 550. Proposed new Conditions 41-43 specify require consultation with and reporting to the ANC and community groups. See also the discussion under the Rock Creek West Comprehensive Plan element in this OP report.

Number of Students, Faculty & Staff

The current cap on student enrollment is 715 and the Seminary proposes to change this cap to a total of 705 full-time and part-time students taking courses in person on the campus. As noted below, a relatively small percentage of this enrollment would reside on campus.

Student Housing

Wesley built one dormitory under the existing campus plan. The current and projected number of beds follows:

Dormitory	Existing 2022	Projected 2032
Straughn Hall	~ 45	0 - demolished
Carroll Hall	~ 45	0 - demolished
New (2014) Residence Hall	76	76
Proposed New Dormitory (in 219 apartment units)	0	659
Total	166	735

Of the existing beds on campus, 76 are currently permitted to be occupied by graduate students not enrolled at Wesley, provided no Wesley student is denied a bed to accommodate a non-Wesley student.

Under the proposed campus plan the seminary is requesting permission any of the bed in the to-be-constructed 659-bed dorm to be occupied by students and immediate families from either the Wesley Seminary or AU provided no Wesley student is denied a bed to accommodate a non-Wesley student or immediate family member. The 76 beds at the existing “New” (2014) dorm would be reserved only for Wesley students or their immediate families.

The majority of Wesley’s students are projected to not reside on campus and the majority of those residing on campus are projected to not be enrolled as Wesley students.

Other Objectionable Conditions

Lighting and Views

The campus does not and would not have the type of high-intensity exterior lighting that often accompanies athletic facilities or performance venues. Light spillage should be limited to sources such as the interior lighting of dormitory and academic buildings and security lighting. The primary generators would likely be the existing New Residence Hall and the upper stories of the proposed new dormitory. The applicant has already started

conversations with neighborhood residents on how the north side of the existing New Residence Hall could be better screened and the design of the proposed new dormitory could be further refined. Final plans for revisions to the existing building and the design of the proposed new building would be considered under Further Processing.

As indicated in the photos and photo simulations in the case file the campus is relatively visible from the north during winter months and is relatively well screened during months when there is foliage on the trees. The plans indicate the applicant plans to plant more trees and considerably more vegetation, which should help to screen even the taller new construction in warm-weather months.

101.3 Any commercial use customarily incidental to a university use in an R, RF, or RA zone, or as an adjunct use to a university building, shall be subject to the following conditions:

- (a) ***There shall be a demonstrated and necessary relationship between the use and the university functions;***

The applicant has recently proposed that up to 500 SF of the proposed new dorm accommodate a “grab and go” retail convenience concession for those residing or working on the Wesley campus. This will be evaluated against Section 101.3 during Further Processing.

101.4 The campus plan process shall not serve as a process to create general commercial activities or developments unrelated to the educational mission of the applicant or that would be inconsistent with the Comprehensive Plan.

The Seminary does not propose any new development that would not be in support of the Seminary’s educational mission. The proposed convenience area in the new dormitory would be limited to those residing in or working on the campus.

101.5 The following development standards shall apply to the maximum total density of all buildings and structures on the campus in an R, RF, RA, or RC-1 zone:

TABLE X § 101.5: MAXIMUM TOTAL DENSITY OF ALL BUILDINGS AND STRUCTURES

Zone	Maximum Height (Feet)	Maximum Floor Area Ratio
All R and RF zones	50	1.8
RA-1, RA-2, RA-6, RA-7, RA-8, RC-1	50	1.8
RA-3, RA-4, RA-5, RA-9, RA-10	90	3.5

The existing FAR on campus is 0.44 and the 1.09 FAR level of total development under the proposed Campus Plan is within the 1.8 maximum. The Regulations limit height to 50 feet but D §207.6 allows for institutional buildings to have a height of up to 90 feet if they are set back a foot for every foot beyond 50 feet.

§207.6 An institutional building or structure may be erected to a height not exceeding ninety feet (90 ft.); 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. (D§ 207.6)

The campus plan is proposing a maximum height of 75.5 feet and it complies with the 25.5-foot setback requirement.

101.6 Because of permissive increases as applicable to normal bulk requirements in the low-density zones regulated by this title, to address this standard it is the intent of this subsection to prevent unreasonable campus expansion into improved low-density zones.

The campus plan retains the campus boundaries that have existed since 1958. There would be no expansion into a low-density residential zone.

101.7 In calculating floor area ratio (FAR), the land area shall not include public streets and alleys, but may include interior private streets and alleys within the campus boundaries.

There are no public streets or alleys within the campus' boundaries.

101.8 As a prerequisite to requesting a further processing for each college or university use, the applicant shall have submitted to the Zoning Commission for its approval a plan for developing the campus as a whole, showing the location, height, and bulk, where appropriate, of all present and proposed improvements including, but not limited to, the following:

- (a) Buildings and parking and loading facilities;***
- (b) Screening, signs, streets, and public utility facilities;***
- (c) Athletic and other recreational facilities; and***
- (d) A description of all activities conducted or to be conducted on the campus, and of the capacity of all present and proposed campus development.***

The proposed campus plan provides an inventory of all campus buildings and shows the location of parking facilities, the use of all building and the capacity of all existing and new developments. The proposed new developments are shown on the table in the preceding Section VI of this report.

101.9 The further processing of specific buildings, structures, and uses within an approved campus plan shall . . .

This is not applicable at this time, as further processing for the two proposed new buildings and the possible retail use is not part of this application.

101.10 Within a reasonable distance of the college or university campus, and subject to compliance with Subtitle X § 101.2, the Zoning Commission may also permit the interim use of land or improved property with any use that the Zoning Commission may determine is a proper college or university function. The land need not be

included in the campus plan. When a major new building that has been proposed in a campus plan is instead moved off-campus, the previously designated site shall not be designated for, or devoted to, a different major new building unless the Zoning Commission has approved an amendment to the campus plan applicable to the site; provided, that for this purpose a major new building is defined as one specifically identified in the campus plan.

No new temporary uses are proposed to be located off site at this time.

101.11 In reviewing and deciding a campus plan application or new building construction pursuant to a campus plan, the Zoning Commission shall consider, to the extent they are relevant, the policies of the District Elements of the Comprehensive Plan.

This has been discussed above in Section VII of this report.

101.12 Is an integral part of the application requesting approval of new building construction pursuant to a campus plan, the college or university shall certify and document that the proposed building or amendment is within the FAR limit for the campus as a whole, based upon the computation included in the most recently approved campus plan and the FARs of any other buildings constructed or demolished since the campus plan was approved.

The maximum density proposed in this campus plan is 1.09 FAR, which is less than the 1.8 FAR permitted in the Regulations.

101.13 Pursuant to Subtitle Z § 405.1, as soon as the application is accepted, the Office of Zoning shall refer the application to the Office of Planning, the Department of Transportation, and the Department of Energy and Environment for review and written reports.

The Department of Transportation (DDOT) will submit a separate report. Comments from the Department of Energy and Environment (DOEE) are attached (Appendix II).

101.14 Approval of a campus plan shall be based on the determination by the Zoning Commission that the application will be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps, and will not tend to affect adversely the use of neighboring property, in accordance with the Zoning Regulations and Zoning Maps, subject to the special conditions specified in this section.

The proposed campus plan would meet the intent of the Campus Plans regulations as outlined at Subtitle X § 100.2. All the proposed renovations, reuse and the new facilities would be for the long term. The campus plan is designed to minimize the impacts of noise and traffic on the adjacent residential uses and would be well buffered from the neighborhood. The Seminary, through the community liaison committees would continue to meet with the ANC, community organizations, and neighbors to provide information, allow input and transparency and get feedback on activities on the campus.

This campus plan should not become objectionable to the surrounding neighborhood.

101.15 Small deviations from plans approved under further processing . . .

This is not applicable at this time.

101.16 A further processing of a campus building shall not be filed simultaneously with a full campus plan application. However, an amendment to an approved campus plan may be considered simultaneously with the further processing if determined necessary by the Zoning Commission.

Further processing is not requested at this time. In the future, the proposed new buildings and possible retail space would need to be reviewed under the further processing requirements.

IX. COMMENTS OF OTHER DISTRICT AGENCIES

The application was referred to various agencies and the responses are as follows.

1. Metropolitan Police Department – no response.
2. Department of Parks and Recreation - no response.
3. Fire and Emergency Services FEMS - verbally stated that they had no concerns with the development plan and would do a full analysis at the Further Processing Stage.
4. The Department of Transportation - is submitting a report under separate cover.
5. Department of the Environment (DDOE) – See Attachment II

X. ANC COMMENTS

The campus is within the boundaries of ANC 3D and will be within the boundaries of ANC 3E when the new ANC boundaries become official. The applicant has had extensive discussions with both of these ANC's (Exhibit 12A6 page 3 of 27). Neither ANC had submitted comments to the case file at the time OP completed this report.

XI. COMMUNITY COMMENTS

The University made presentations to the community organizations noted in Exhibit 12A6, page 3 of 27. A party status application in opposition has been jointly filed by Neighbors for a Livable Community and the Spring Valley-Wesley Heights Citizens Association at Exhibit 13. A party status application in support has been filed by the Spring Valley Neighborhood Association at Exhibit 16. There is also an individual letter of support at Exhibit 14.

ATTACHMENTS:

Attachment I – Applicant's Proposed Conditions

Attachment II – DDOEE Comments

APPENDIX I: APPLICANT’S PROPOSED CONDITIONS FOR WESLEY THRIVE IN PLACE CAMPUS PLAN (2022-2032)⁶

1. Approval of the Campus Plan shall be valid for ten (10) years beginning with the effective date of this Order.
2. The Campus boundaries shall include Lots 6 (818 and 819), 7, 8 and 9 in Square 1600 with a land area of 381,878 square feet (8.77 acres).
3. Wesley student enrollment headcount during the life of the Campus Plan shall be subject to the following Academic Year (September through August) limit of 705 full and part-time degree and non-degree students attending classes on campus, including Master of Divinity (M.Div.), Master of Theological Studies (M.T.S.), Master of Arts (M.A.), Doctor of Ministry ((D.Min.) degree students attending two-week sessions on campus during off-semester periods, and for Course of Study non-degree students attending weekend (Friday Night-Saturday) or two-week summer on campus programs. All students in degree and non-degree programs that participate entirely off-campus or by remote or virtual classes are not subject to this enrollment cap.
4. The number of Seminary employees (headcount) over the life of the Campus Plan shall not exceed 100 employees (including all full and part-time), excluding non-Wesley employees managing and operating the New Dormitory. Not more than 12 employees (full and part-time) will be employed to manage and operate the New Dormitory but excluding any student resident assistants/community ambassadors living in the student residential building.
5. The total build out of the campus facilities (including existing buildings) shall not exceed 417,203 square feet of gross floor area during the term of the Campus Plan. The total proposed FAR is 1.09 which is approximately 270,000 square feet less than the permitted 1.8 FAR.
6. Provide a total range of 331-381 parking spaces on campus, including underground and surface parking.
7. The Applicant shall provide a maximum of 735 student beds on Campus (659 student beds in the proposed New Dormitory and 76 student beds in the dorm constructed in 2014 (“2014 Dorm”)) during the term of the Campus Plan. Occupancy of the 2014 Dorm will be limited to Seminary students.
8. The Old President’s House, parking area, driveway and curb cut will be demolished and the site restored with landscaping and a small community playground in substantial accordance with the Landscape Plan at Exhibit ____.
9. The existing surface parking lot (143 spaces), and adjacent one-story maintenance building will be demolished.
10. The existing Straughn Hall and Carrol Hall student residence buildings (90 beds) will be demolished.

⁶ See additional OP recommendations pages 1 and 2 of this report.

11. The existing campus buildings, including Kresge Academic Hall, Trott Administration Building and Chapel, Library and 2014 Dorm will be retained as-is.
12. The Seminary will implement a campus-wide security and vehicle access and parking monitoring system to be approved during Further Processing. The Seminary will designate, maintain and publicize a Community Point of Contact (telephone hotline and electronic mail) to be available 24/7 to respond to security, parking, and other neighborhood issues.
13. The New Administration, Faculty and Maintenance Building (“New Administration Building”) will be developed, after Further Processing, in substantial accordance with the plans attached as Exhibit ____⁷. The new two-story building will be residential in scale and design with approximately 5,267 square feet of gross floor area and designed to meet LEED New Construction Gold certification. The building will provide administrative and faculty spaces and a small maintenance facility located on the lower level. Trash from the 2014 Dorm will be stored in a screened area at the New Administration Building. Additional landscaping screening for the New Administration Building and New Dormitory will be installed along the University Avenue driveway.
14. The New Dormitory will be developed on Lot 819 to house only enrolled Wesley students (and their immediate families) and American University students (and immediate families, if any), resident management personnel and student resident assistants/ambassadors, after Further Processing, in substantial accordance with the plans attached as Exhibit _____. Seminary students will be given first priority for housing in the New Dormitory. The New Dormitory will be constructed in accordance with a long-term (99-year) ground lease between the Seminary and Landmark Properties. During the term of the ground lease, use of the site is strictly limited to “first-class student housing” (including small “Grab and Go” provided in Condition 16, below) and no other purpose. At the conclusion of the ground lease, ownership of the improvements will revert to the Seminary.
15. The New Dormitory will be seven (7) stories (approximately 75 feet, 8 inches) and a habitable penthouse (of not more than 12 feet) with a total gross floor area of approximately 306,517 square feet. Two levels of underground parking (300-350 spaces) and internal loading and trash facilities will be provided. The Seminary will require Landmark Properties to provide on-site resident management personnel and student resident assistants/community ambassadors, 24/7 state of the art access security system and electronic monitoring, and code of conduct enforcement (including, when applicable, Parental guarantees of occupancy agreements), and law enforcement in residence program when available.
16. This proposed purpose-built student housing will have approximately 215 units configured in studio, one, two, three, four and five bedroom units with a total of 659 beds. Each unit will contain common living area for the student residents. The New Dormitory may include a small (not more than 500 square feet) ground floor “Grab and Go” retail space providing student conveniences, including food, non-alcoholic beverages, and hygiene essentials for the residents (and their visitors) and Seminary students. This retail space will have no exterior signage or advertising.

⁷ Exhibit reference not supplied in applicant’s proposed Conditions.

17. AU students residing in the New Dormitory will have access to all Seminary facilities, including the library and dining facilities.
18. All residents will be subject to a code of conduct imposed by Wesley's student covenant and/or American University's Code of Conduct, and the Landmark Code of Conduct and Parking Addendum which prohibits (and enforces) residents from parking off-campus in the surrounding neighborhood.
19. The New Dormitory will be LEED Mid-Rise Residential Gold and include sustainable features, including solar panels, green roof, limited rooftop mechanical equipment, and Dark Sky compliance. At Further Processing, the New Dormitory will incorporate additional design elements, including design refinements on the upper floors facing University Avenue and shades and blinds in the upper floors.
20. The Applicant will maintain and enhance the existing Green Open Space Buffer Zone on University Avenue and Massachusetts Avenue in substantial accordance with Exhibit ___⁸ and the Landscape Plan. The Green Open Space will include approximately 210,000 square feet (about 55% of the Campus area) that will remain undeveloped, except as specifically provided for the duration of the approved Campus Plan.
21. The Applicant will seek Further Processing approval for a small neighborhood playground to be located set back from University Avenue in the area of the three residential lots (7, 8 and 9). The playground will be approximately 40 feet by 95 feet with an area of 3,800 square feet and equipped with suitable play equipment, open to the neighborhood, fenced and open only during daylight hours.
22. The Applicant shall implement, over the life of the Campus Plan, a Transportation Demand Management Plan, contained in Exhibit ___⁹, to reduce and manage traffic and parking. Residing on the Campus will not qualify anyone for Residential Permit Parking decals from the District of Columbia.
23. After occupancy of the New Dormitory, the Seminary will perform a traffic monitoring survey annually for the first two (2) years and report the results to DDOT, ANC 3D, ANC 3E and the Community Liaison Committee. If warranted by the traffic survey, the Seminary will implement additional TDM measures and University Avenue access restrictions in consultation with DDOT, ANC 3D, ANC 3E and the CLC. Annual traffic monitoring will be extended until such time as the TDM and traffic mitigation goals have been met for two consecutive years.

Parking and Vehicular Traffic:

24. The current vehicular one-way exit-only traffic pattern from the Seminary to University Avenue will be maintained. Vehicles also will be able to enter and leave the Seminary through the Massachusetts Avenue exit. Vehicles exiting from Massachusetts Avenue will be Right Turn only. The Seminary will request DDOT to assess the feasibility, including

⁸ Exhibit reference not supplied in applicant's proposed Conditions.

⁹ Exhibit reference not supplied in applicant's proposed Conditions.

- potential traffic impacts of installing a traffic signal at the Massachusetts Avenue entrance or allow left turn for exiting vehicles on a limited basis.
25. The Applicant agrees to limit use of the University Avenue driveway for entry by emergency and limited service and delivery vehicles (e.g., trash and food service deliveries to refectory) required to access the campus from this location.
 26. During the AM (6:30 am – 9:30 am) and PM (4:00 pm – 7:00 pm) Peak Hours, use of University Avenue for exiting vehicles will be prohibited and appropriate enforcement measures implemented. The Applicant shall limit all vehicles using the University Avenue exit from accessing University Avenue except by a right-turn movement. Additional restrictions on vehicles exiting on to University Avenue will be evaluated as needed after occupancy of the New Dormitory.
 27. The Applicant's Campus Plan will respect and complement the terms of the recently approved American University Campus Plan (ZC Order 20-31), including enrollment, on-campus housing requirements, off-campus enforcement of AU student conduct and parking, and the maintenance of the existing fence separating the two campuses and access restrictions.
 28. The Applicant shall require all students, residents, staff, faculty, and visitors to park on campus (visitor parking will be provided on campus) or at metered parking spaces within the area.
 29. The Applicant shall maintain a minimum of 331-381 parking spaces, including visitor parking on Campus throughout the term of this Campus Plan and make all best efforts to discourage and prevent students, residents, faculty, and staff from parking on neighborhood streets.
 30. The Seminary agrees to take any other necessary steps, if necessary, to address parking shortages, including, the possibility of altering class schedules, as outlined in the Transportation Demand Management (TDM) Plan. The Applicant, including Landmark, will actively enforce restrictions on off-campus student parking in addition to American University's long-standing off-campus parking enforcement program.
 31. In addition to interior bicycle storage, 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.

Construction Management:

32. All construction vehicles shall access the campus through the Massachusetts Avenue entrance. If exceptional conditions mandate use of University Avenue by construction vehicles (e.g., construction crane) to access the construction site, the only access will be from the existing exit to University Avenue with right turn only for exiting vehicles. 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.
33. The Seminary will develop with the participation of the community a construction management plan that: a.) designates a Seminary Point of Contact for construction activity

issues; b.) establishes a 24-hour construction contractor point of contact; c.) conducts a pre-construction community meeting to coordinate construction activities at least 90 days before construction; d.) provides for construction worker and construction vehicle parking at locations other than neighborhood streets; e.) minimizes on-street truck idling in compliance with all applicable regulations; f.) ensures trucks are brushed and loads are covered prior to leaving the construction site; and g.) ensures compliance with on-site environmental regulations for maintaining the construction site. The Seminary will be responsible for implementing the Construction Management Plan and serve as the primary point of contact for the community.

34. The Applicant will establish a neighborhood construction management committee to discuss ongoing issues during the construction phase of the project and address remediation issues tied to any damage to neighbors' property during construction.

Landscaping:

35. The Applicant will implement the Landscape Plan in substantial accordance with Exhibit _____.¹⁰
36. The Seminary will work with the Community Liaison Committee during Further Processing to review and make all best efforts to achieve consensus on a final landscaping plan prepared by the Seminary's professional landscape architect to create an effective and aesthetically pleasing interface between the Campus and residents' homes. The final landscaping plan will be subject to final review and approval during Further Processing.

Environmental Issues:

37. Prior to filing a permit application with the DC Department of Consumer and Regulatory Affairs (DCRA) for ground clearance, excavation, or other construction that could require investigation and/or remedial work at or around the campus by the U.S. Army Corps of Engineers because of its prior use as Camp Leach as part of the American University Experiment Station Formerly Used Defense Site (FUDS), the Seminary shall provide notification to the District Department of Energy and Environment (DOEE), the U.S. Army Corps of Engineers (USACE), and the U.S. Environmental Protection Agency (EPA), Region 3, that Wesley Seminary intends to undertake such activities. The Seminary will report on the outcomes of its interactions with, the DOEE, USACE, and EPA on this issue to ANC 3D, ANC 3E and the Community Liaison Committee and cooperate fully with the DOEE, USACE, and EPA as required, including implementation of any required Campus Safety Plan during excavation and construction.
38. Prior to filing a permit application with the DC Department of Consumer and Regulatory Affairs (DCRA) for ground clearance, excavation, or other construction, the Seminary shall develop a stormwater management plan and submit the plan to the DOEE for review and report the outcome of that review to ANC 3D and ANC 3E, and the Community Liaison Committee.

¹⁰ Exhibit reference not supplied in applicant's proposed Conditions. Applicant's landscape plan is in Case File Exhibit 12 H-P, pp. 3 and 4 of 19.

39. Throughout the term of the Campus Plan, the Applicant shall work directly with residents and the Community Liaison Committee to provide information to ensure that the construction does not have unanticipated stormwater impacts on residents' property and shall address any impacts should they occur.

Other Issues:

40. The Seminary shall ensure that all funding sources are in place prior to beginning construction so that there is no disruption in construction due to a lack of financial resources.
41. The Seminary shall maintain a Community Liaison Committee that meets three times annually or more often if necessary and includes neighborhood resident representatives of ANC 3D, ANC 3E, the Spring Valley-Wesley Heights Citizens Association, Neighbors For A Livable Community, Spring Valley Neighborhood Association, and individual residents of Spring Valley living within 200 feet of the Seminary's property line at University Avenue. Other interested residents and neighborhood groups are invited to participate in the CLC's public meetings.
42. At least twice annually, after Further Processing and beginning prior to occupancy of any new building, the Seminary will attend ANC 3D meetings to review Campus Plan performance issues identified in collaboration with the CLC.
43. The Seminary will support ANC 3D's request to DDOT for the installation of a sidewalk on the east side of University Avenue and encourage the use of permeable pavers.
44. The Seminary will install screening for the three exhaust pipes on the 2014 Dorm and monitor and correct any excessive noise.
45. The Seminary will not sell or lease any part of the Spring Valley Campus to American University for university use during the term of this Campus Plan.
46. The Seminary agrees to continue to make best efforts to engage with American University on issues of potential collaboration which affect the operation of the Seminary's Campus Plan, and which also affect the impact of the Plan on the neighborhood.

APPENDIX II: DOEE STAFF COMMENTS TO OP

DOEE Development Review Comments

ZC 22-13: Wesley Theological Seminary Campus Plan

DOEE applauds the applicant's commitment to achieve LEED Gold certification for the proposed new buildings on campus, and especially appreciates that the applicant will certify the new dormitory under with the LEED Multifamily Midrise rating system, which is best suited for this type of building and includes features that will benefit future tenants.

DOEE encourages the applicant to pursue environmental benefits beyond the LEED rating system and to set overarching sustainability goals for the campus. Many colleges and universities have set net-zero energy targets and renewable energy generation targets that help guide decisions about both new and existing buildings. DOEE can assist the applicant with setting goals that align with those of other colleges and universities and the District, as a whole. The following recommendations are intended to assist the applicant with incorporating strategies that will improve campus sustainability and minimize the applicant's impacts on the environment.

Many of these strategies can be financed with no upfront cost through [DC PACE](#). The [DC Green Bank](#) and the [DC Sustainable Energy Utility](#) (DCSEU) also offer innovative financial products and technical assistance to help projects gain access to capital. To learn about project-specific financing options, contact Crystal McDonald at cmcdonald1@dcseu.com or complete DCSEU's [Custom Rebate Form](#).

Energy Performance and Electrification

If the applicant is looking to increase their commitment to sustainability, some of the most significant gains would be in the areas of energy efficiency and maximization of on-site renewable energy, both of which are District priorities. Maximizing energy efficiency at the time of construction will more cost effectively assist in meeting [Building Energy Performance Standards](#) (BEPS) in the future. The BEPS program was established in Title III of the Clean Energy DC Omnibus Act of 2018. The Act states that starting in 2021, owners of buildings over 50,000 square feet that are below a specific energy performance threshold will be required to improve their energy efficiency over the next 5 years. Projects below the performance threshold will be able to choose between a performance pathway, which requires that they document a 20% reduction in energy usage over the 5-year compliance period, or a prescriptive list of required energy efficiency measures. The next BEPS will be established in 2027 and again every six years, and the compliance threshold will increase each cycle. New projects are encouraged to maximize energy efficiency during the initial design and construction in order to meet BEPS upon completion.

In line with the District's goal of carbon neutrality and the objectives of the [Sustainable DC 2.0](#) and [Clean Energy DC](#) plans to reduce greenhouse gas emissions, DOEE encourages the applicant to design new campus buildings to be fully electric (i.e., eliminate the on-site combustion of fossil fuels). DOEE also encourages the applicant to develop a phase-out plan for the combustion equipment in existing campus buildings. DOEE and DCRA are evaluating options to include building electrification requirements in future code updates. Building electrification involves powering all building appliances and systems (e.g., domestic hot water, heating equipment, cooking equipment) with electricity rather than fossil fuels (e.g., natural gas or fuel oil). Efficient electric systems reduce indoor air pollution caused by combustion equipment and can save on operating

costs, especially when coupled with solar energy. All-electric buildings can also save on construction costs by avoiding the need to install gas piping. It's easier and more cost-effective for new construction to be designed with electric systems than it is to retrofit buildings later, so DOEE strongly encourages projects to evaluate electric options as part of their initial energy modeling exercises. For more information about building electrification in the District, visit [this resource page](#) created by the Building Innovation Hub.

DOEE encourages the applicant to provide electric vehicle charging stations or install make-ready infrastructure so that charge points can be added at a later date. One [study](#) found that the cost to install EV capable infrastructure during new construction is four to six times less expensive than during a standalone retrofit. The [2017 DC Green Construction Code](#) provides some suggested thresholds for the provision of supply equipment and make-ready infrastructure. EV resources and information about available incentives are available at <https://doee.dc.gov/service/electric-vehicles-resources>.

Net-Zero Energy

Clean Energy DC, the District's detailed plan to reduce greenhouse gas emissions, calls for net-zero energy (NZE) building codes by 2026. DOEE encourages the applicant to explore net-zero energy construction/certification ahead of this planned code requirement. An NZE building is a highly energy-efficient building that generates enough on-site, or procures acceptable offsite, renewable energy to meet or exceed the annual energy consumption of its operations. NZE buildings can benefit both owners and tenants through significantly lower operating costs, improved occupant comfort and improved indoor air quality. Under the [2017 District of Columbia Energy Conservation Code](#), projects can use Appendix Z as an alternative compliance pathway, which provides a working definition and guidance for NZE.

DOEE has published a *Net-Zero Energy Project Guide*, a *Multifamily Guide*, and an *Integrated Design Charrette Toolkit* to assist project teams with planning, designing, constructing and operating NZE buildings. These and other resources can be found at doee.dc.gov/service/greenbuilding.

For the past few years, DOEE has offered grants to projects exploring NZE design and other innovative green building approaches. Case studies and final reports from some of these projects are available at [here](#).

If the applicant is interested in NZE construction, either on this project or future projects, DOEE can be of assistance. Please reach out to Connor Rattey at connor.rattey@dc.gov for more information.

Solar

DOEE encourages the applicant to maximize solar energy generation on campus and recommends consulting with an expert from DCSEU to learn about custom rebate options and other financial incentives for renewable energy and energy efficiency measures.

DOEE encourages the applicant to consider participating in the [Solar for All](#) program, which aims to bring the benefits of solar energy to 100,000 low to moderate income families in the District. The applicant's planned solar PV systems could qualify as community solar systems to be used to cut electricity bills in half for income-qualified residents. Contact [DCSEU](#) for additional information.

Maximizing solar energy production will contribute to achieving the District's goals to rely on 100% renewable electricity by 2032 and increase local solar generation to 10% of total electricity by 2041. As a result of the District's commitments, there are many financial incentives to install solar.

One way that the project can maximize solar energy production is to integrate solar photovoltaic arrays into green roofs. See the GAR and Stormwater Management section below for more details.

Climate Resilience

In order to prepare for the impacts of climate change, including increased flooding and extreme heat, DOEE encourages the team to assess how climate change will affect the project and to incorporate resilient design strategies. As part of the [Climate Ready DC Plan](#), DOEE released [Resilient Design Guidelines](#) to assist project teams considering climate resilient design. Additional DOEE Climate Adaptation and Preparedness resources are available at doee.dc.gov/climateready.

Green Area Ratio and Stormwater Management

DOEE encourages the applicant to exceed the minimum GAR and stormwater requirements. This project is located in an area of the District that has a municipal separated storm sewer system (MS4), which means that stormwater runoff is discharged, untreated, into local water bodies. Stormwater from this project site is discharged into the Potomac River. Stormwater management strategies used by projects located in the MS4 are more environmentally beneficial than those used by projects in the combined sewer system (CSS). Additional on-site stormwater retention can earn the project Stormwater Retention Credits (SRCs) that can be sold through DOEE's Credit Trading Program. SRCs can be sold directly to DOEE through the SRC Price Lock Program (for projects located in the [MS4 Sewer System](#) only) or sold on the open market. For more information, please visit <https://doee.dc.gov/src> or email Matt Johnson at src.trading@dc.gov.

The applicant should note that for all projects occurring on campuses, each site drainage area point of discharge will be determined based on the boundary of the LOD and/or Major Substantial Improvement activity. Further, any stormwater best management practice (BMP) or any portion of a BMP's contributing drainage area that falls outside of the LOD, regardless of if it falls within the campus boundary, may not be used to meet on-site requirements. They can, however, be used to generate Stormwater Retention Credits (SRCs).

This campus is within the non-tidal MS4 and, therefore, all Major Land Disturbing activity must meet detention requirements for the 2-year storm event. The applicant is encouraged to explore permeable or compacted cover options for areas such as campus pathways and pedestrian circulation.

The applicant's pre-hearing statement indicates that the new dormitory will include solar panels and green roof area. DOEE applauds this effort and encourages the applicant to maximize the roof space covered by these features. These strategies can be combined without diminishing a project's GAR or stormwater requirement compliance. DOEE has issued guidance on how to successfully incorporate solar into green roofs on pages 41 & 42 of the [2020 Stormwater Management Guidebook](#).

DOEE is prepared to meet with the project team to discuss GAR and stormwater opportunities on the project site. To set up a review meeting with the stormwater team at DOEE, please contact Ayende Thomas at ayende.thomas@dc.gov.

Urban Agriculture

If the applicant is interested in establishing an urban farm for profit, non-profit, or educational purposes, the DOEE Office of Urban Agriculture is happy to discuss available grant and incentive programs. For additional information, contact kate.lee@dc.gov.

Deconstruction, Reuse, and Embodied Carbon Reduction

DOEE encourages the applicant to conduct a simple life-cycle analysis (LCA) to measure and reduce the impacts from the proposed dormitory's structural and envelope design. An LCA is an effective tool to measure the embodied carbon, or global warming potential (GWP), of a building and its materials. An LCA can inform decisions about the selection and quantity of materials used, and can assist with dematerialization (i.e., reducing the amount of a given material). Dematerialization reduces environmental harm and saves money.

Embodied carbon is the sum of all greenhouse gas emissions resulting from the construction of buildings, including materials and construction activities. It is estimated that 23% of the world's GHG emissions result from construction. Most of these embodied emissions are associated with the production and use of concrete and steel, common structural elements. The energy savings of a high-performance building can take decades to offset the impacts of the building's construction. DOEE recently funded two grant projects focused on reducing embodied carbon through LCAs. The lessons learned by these grantees may help the applicant identify simple ways to reduce the project's embodied carbon and understand how to conduct a basic LCA. The reports from these projects are available here: [LCA for St. Elizabeth's Building 2 Commercial Office by Hickok Cole](#) and [Embodied Carbon Life Cycle Assessment Assistance for Southeast Neighborhood Library by Quinn Evans](#).

Wherever possible, DOEE encourages the reuse of existing buildings and materials because the demolition of these buildings and construction of entirely new buildings is very carbon intensive. Given that this project involves razing the existing structure on-site, DOEE encourages the applicant to explore options for deconstruction and reuse or salvage of materials from the existing structure. In 2018, construction and demolition (C&D) activities in the US generated 600 million tons of waste. The reuse and rehabilitation of existing buildings can reduce waste and embodied carbon. When reuse is not possible, deconstruction or pre-demolition salvage can divert waste from landfill and incineration and allow for reuse of building materials. Destruction is the process of carefully and intentionally dismantling a building rather than demolishing it. While this process is more time consuming than demolition, reusing salvaged materials can reduce construction costs, and the sale of salvaged or recyclable materials can generate additional revenue. Organizations like [Community Forklift](#) collect donations of unwanted and salvaged building materials throughout the DC region. DOEE is also working to develop a Donation and Reuse program and may have additional resources and information available at the time of project construction. The applicant is encouraged to reach out to Connor Rattey at connor.rattey@dc.gov encouraged if they are interested in deconstruction of existing structures or donation and reuse of building materials.