

From: Josefa Scholz jtscholz@msn.com
Subject:
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To:



Thursday, June 9, 2022

Members of the Zoning Commission
Anthony J. Hood-Chairperson Appointee
Robert Miller-Vice Chairperson Appointee
Joseph S. Imamura, Ph.D.-Architect of the Capitol Designee Appointee
Peter G. May-National Park Service Designee

Ref: Zoning Commission Case No. 22-13

Dear Members of the DC Zoning Commission (ZC),

I am writing to oppose the referenced 2022 Wesley Theological Seminary Campus Plan.

My name is Josie Scholz. I live at 3900 University Avenue, across from Wesley Theological Seminary (WTS), at the intersection of Wesley's driveway, University Avenue, and Sedgwick Street. I have lived at this address for over 40 years, have raised three sons with my husband Bob, and am hoping to live in our home as long as we are able. WTS has been led by three presidents since we moved in, we are long time neighbors.

I am writing, and will speak in opposition to WTS's 2022 campus plan at the ZC hearing on Monday, June 13, 2022. It is not easy to be in opposition to Wesley as its desire to "thrive in place" is a good idea. However, looked at closely, its campus plan should not be approved by the ZC as it goes counter to DC zoning regulations that outline the types of campus development allowable for educational institutions in residential neighborhoods.

I am very grateful for the research done by my neighborhood associations Neighbors for a Livable Community (NLC) and the Spring Valley- Wesley Heights Citizens Association (SVWHCA), who have filed for party status in opposition in this case. The members of the above groups are long time community members, knowledgeable about DC zoning. I support their opposition to WTS's campus plan and find their arguments thorough and compelling.

To begin:

WTS HAS A BEAUTIFUL CAMPUS

Adjoining American University, WTS inhabits a beautiful low density campus, located on a hill overlooking the low density residential Spring Valley neighborhood. The campus is composed of handsome midcentury modern two-story red brick classroom and administrative buildings, refectory, library, and chapel, all surrounding a tree shaded, open quad with a reflecting pool and a 4-bell bell tower. A parking lot, two midcentury modern dorms and a dorm built in 2014 are adjacent to the quad.

Fitting seamlessly into the residential neighborhood because of its setback up the hill and the low height of its buildings, the seminary is a serene space for graduate seminary students to live, learn, and enjoy nature. Neighbors also enjoy the grounds, with lawns, trees, and landscaping flowing down the hill to Massachusetts and University Avenues.

A prominent Massachusetts Avenue religious landmark, the WTS entrance is marked with a bronze statue of John Wesley mounted on horseback and an oversize Bas-Relief of Christ on the front of the chapel.

WTS SOUGHT FINANCIAL VIABILITY IN 2014 THROUGH A NEW DORM AND IN 2017 THROUGH ADDING AU GRAD STUDENT RESIDENTS

However beautiful the campus and honorable its mission, in recent years WTS has experienced declines in enrollment and on-campus living, putting its existence at risk. The campus population decline has followed national trends of falling church membership and attendance. After an attempt to improve its finances by building its newest dorm in 2014, and finding Wesley students could not fill it, WTS received permission from the ZC in 2017 to house as many as 87 AU graduate students in the 172 bed accommodations. This solution was to be small in scope and temporary in nature, to help WTS out financially. However, WTS's enrollment continued to decline and the residences have not been fully filled with either Wesley's own, or the approved AU, graduate students.

And now, with changes in education and work since the pandemic (less in-person, more remote and hybrid), and enormous economic instability due to the ongoing pandemic, war, recession, climate change imperatives, and more, the viability of the seminary has become even more precarious.

WTS SEEKS FINANCIAL VIABILITY IN 2022 THROUGH A GROUND LEASE AND NEW STUDENT APARTMENT BUILDING

WTS is approaching the ZC to find a way to improve its financial viability through its 2022 campus plan. WTS is proposing to monetize a part of its tax free land by signing a 99 year ground lease for a lump sum and yearly payments, and turn over a part of its campus to Landmark Properties, a national leader in student off-campus luxury apartment housing. Landmark is a very successful company, with approximately over \$7 billion in assets, \$3 billion in properties under construction, a 50,000+ bed portfolio, and 75+ off-campus properties in 28 states. Landmark's template for success is to build upscale off-campus student housing, no more than 3 miles from a campus, for premier schools with at least 10,000 students. Its projects fill a need and offer attractive returns to its investors.

WTS's proposed student apartment building fulfills Landmark's criteria, except that while it will be built off-campus from AU, it will be built on-campus at WTS, creating zoning challenges. The new residence will be called "The Standard at Wesley." "Standard" is one of Landmark's housing brands, offering luxury housing with lavish amenities to students to set a new "standard" for student off-campus living. Landmark will develop this leased WTS land, excavating down for two levels of parking, then building and managing an 8 story student high-end apartment building, with a full kitchen and washer/dryer in each unit and a swimming pool in its interior courtyard.

THE LANDMARK HOUSING PLAN VIOLATES WTS'S ARCHITECTURAL INTEGRITY, ACADEMIC PROGRAM, AND ZONING REGULATIONS

I believe the 2022 plan will adversely impact both WTS's cohesive architecture by changing the height, size, and density of the built campus, and the cohesive academic unity of the graduate population by adding AU undergraduates, with a younger age and maturity level, and a different academic focus, as residents. Both of the above changes will impact the neighborhood and could even negatively affect Wesley's own long term survival. In addition, I believe that housing students from another university (AU) and leasing tax free land to a commercial developer to obtain a revenue stream are NOT part of the seminary's educational mission, nor should they be permissible under DC zoning regulations.

THE APARTMENT BUILDING IS TOO LARGE AND TALL FOR THE SITE

The proposed student apartment building, to house 659 students, is too large at 306,507 square feet. As existing buildings on campus total 110,698 square feet, it will have almost 3x the square footage as the rest of the campus structures (around 73% of total campus square footage). The total new square footage would equal 417,203 square feet. In comparison, to illustrate the large size of this apartment building: AU's Katzen Art Center, up the street on Massachusetts Avenue, occupies 130,000 square feet, with gallery, academic, and performance wings, and is around 1/3 the size of the WTS proposed building.

The new residence is too tall, at 8 stories it is 4x taller than the rest of the 2 story campus buildings and is out of scale with the rest of the architecture. Its dimensions, including its height, and the fact that WTS is located on a hill above Spring Valley, make it very visible from the neighborhood. The building, located in a tight corner of the campus, is not designed to meet student housing needs, but to fill as much of the leased land as possible, to maximize the number of rooms (659) and subsequent revenue.

THE APARTMENT BUILDING IS NOT NEEDED FOR WESLEY STUDENTS, AU GRAD STUDENTS MIGHT NOT CHOOSE TO LIVE THERE

The new residence is not needed to house WTS students as WTS has had more housing than residents in recent years; it seems that the new 659 bed residence could even house more non-Wesley (AU) students than there are enrolled Wesley students, possibly pushing the entire campus student cap over its limit. It seems risky to think that grad students will choose to live in a majority undergrad apartment building; in recent years WTS has not been able to fill its current available housing spaces with its own, or the small allowable number of AU, grad students; even WTS grad students have been increasingly choosing to live off campus.

AU STUDENTS AS RESIDENTS COULD DOUBLE THE WTS POPULATION AND CHANGE THE CAMPUS ATMOSPHERE

The influx of AU students as residents could possibly double the total student population on campus; if mostly they are mostly undergraduates, that could change the majority of students from graduates to undergraduates, possibly negatively altering the atmosphere and cohesiveness of Wesley's graduate program, and leading to a decline in applicants. 500-600 younger, less mature, and academically more diverse students on campus will also impact the neighborhood, requiring modifications for traffic, safety, security, noise, density, and environmental issues. Modifications will be needed if WTS changes from a solely graduate institution to an undergraduate dominated one.

THE APARTMENT BUILDING DOES NOT FULFILL WTS'S MISSION

The new residence does not augment WTS's mission to provide graduate religious education; it will not be an integrated part of the campus or curriculum, but instead will be managed separately, a commercialized use of tax free land, creating revenue for Landmark and its investors and WTS, a cash cow in the back 40 of the campus.

The building is not designed for Wesley's students, although since the project involves the tear down of the WTS dorms that are designed for families, students with families will find units with multiple bedrooms there. Other WTS students will be expected to live in the 2014 dorm. Unfortunately it seems that more amenities will be available for the residents of the new building than will be available for WTS students in the 2014 dormitory.

THE BUILDING VIOLATES NON PROFIT ZONING RULES AND DEPRIVES DC OF APPROPRIATE AND NEEDED PROPERTY TAXES

Built on tax exempt land and sited near the AU campus, Landmark will have an unfair advantage, in pricing and renting units, over nearby commercial apartment buildings and AU (possibly even over the to-be-built AU dorms recently approved by the ZC, with a dorm of 500 students to be built just up the street). In addition, this tax advantage for Landmark for this

multimillion dollar apartment building over such a 99 year long span will result in a very significant income loss for DC residents and their always financially strapped, DC property tax supported, school system.

THE APARTMENT BUILDING CAUSUS DISADVANTAGES FOR AU

AU, next door to WTS, has been mostly silent on this project. AU must wonder what impact this WTS student apartment building, to be marketed to its students, will have on their residential housing program, specifically the to-be-built 500 bed dorm (plus two possible others as needed) that they have just been given ZC approval to build just up University Avenue from WTS. In breaking their silence at community meetings the only thought that AU has offered is that it prefers to house its students in its own dorms. Looking online at AU's housing program, one can see what AU offers students in their dorms: many "live and learn" residential communities that focus on interdisciplinary study, service, global leadership, critical thinking, and much more. Collegiate residential housing can offer more than physical amenities, it can support and stretch the minds and hearts of students living together with a common purpose.

In conclusion:

The WTS 2022 campus plan is not about WTS seeking to build a residential unit for its students in harmony with its campus architecture or values (actually WTS already has more than enough beds to accommodate its students), but is about monetizing a portion of the WTS campus for the next 99 years to generate income for its program.

I believe that leasing its land to a commercial entity to meet that goal will cause significant negative issues for WTS, the neighborhood, and AU; and while finding financial stability is important and necessary for WTS, it should be, and can be, addressed in ways other than through stretching or violating DC zoning regulations for educational institutions in residential neighborhoods.

I hope WTS continues on its journey of seeking ways to thrive in place, and comes before the ZC at a future date with a revised campus plan that reflects and strengthens everything that is special and beloved about their beautiful spiritual program and campus in our neighborhood. Such a proposal would be something, that this neighbor, at least, would want to fully support. Thank you for your time.

Josie Scholz
3900 University Avenue, NW
Washington, DC 20016
202-330-2216
jtscholz@msn.com