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December 20, 2024

BY IZIS

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

Re: Applicant's Request to Resume Case
Zoning Commission Case No. 23-08(1)
Application of The Wesley Theological Seminary of the United Methodist Church
for a Campus Plan (2023-2033)
4500 Massachusetts Avenue, N.W.
Square 1600, Lots 6 (818 and 819), 7, 8 and 9.

Dear Chairman Hood and Members of the Commission:

The Wesley Theological Seminary ("Wesley") respectfully requests the Commission to resume the long-standing Campus Plan case and proceed with continued review of this application once Final Action has occurred in Z.C. 24-09. The parallel PUD case (Z.C. 23-08) has been withdrawn.

The Campus Plan case, at the direction of the Commission, has been held in "abeyance" since May 2024 to allow the directly related Text Amendment Petition (Z.C. 24-09) to progress through the rulemaking process. On December 19, 2024, the Commission voted to take Proposed Action on the Text Amendment which will proceed to Final Action after referral to NCPC. As has been stated previously, time is of the essence in progressing this case. Wesley needs to know where it stands and be in a position to finalize a ground lease and permit plans. Taking advantage of this interim period, Wesley wants to prepare for the resumption and conclusion of the Campus Plan process which has been before the Commission since March 2022.

In order to facilitate the efficient and timely processing of the pending Campus Plan application, Wesley respectfully requests a waiver of:

- 1.) Subtitle X, Sec. 101.16 to allow the processing of the pending Campus Plan and further processing together; and
- 2.) Subtitle Z, Sec. 302.6 for a 45-day notice of intent for further processing.

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Pursuant to Subtitle Z, Sec. 101.9, the “Commission may for good cause shown waive any provisions of this subtitle, if in the judgment of the Commission, the waiver will not prejudice the rights of any party and is not otherwise prohibited by law.” Wesley’s Campus Plan, which includes detailed plans for the proposed dormitory consistent with further processing requirements, has been publicly noticed and the subject of three public hearings already. As a result, simultaneous further review of the of the Campus Plan and further processing plans should not prejudice any of the multiple parties (including two ANCs) who have been actively engaged in this process since March 2022. Certainly, no additional notice of intent is warranted for a plan that has remained substantially unchanged since its original filing and has been subject to lengthy public hearings on June 13, 2022 and September 11 and October 2, 2023, numerous and voluminous filings for and against, and numerous public meetings. Unlike most, much larger and more complex campus plans, the Wesley Campus Plan involves a small site and only one new dormitory and retention of the existing campus plan boundaries. Given the lengthy history, sequential campus plan and further processing applications and procedures are unduly protracted and burdensome adding an estimated additional 12-18 months before Wesley can know whether the proposed project can proceed. Unnecessary delay of sequential processing of Wesley’s Campus Plan and further processing of the proposed dormitory project is unsustainable for Wesley and will not contribute to a fuller or fairer resolution of this contested case.

As a preliminary matter, Wesley requests the Commission to take up the requested waivers at its January 16, 2025 public hearing. This will allow ANC 3D and ANC 3E to respond after each Commission’s January monthly meeting (scheduled for January 8 and January 9, respectively), and submissions from OP and other parties.

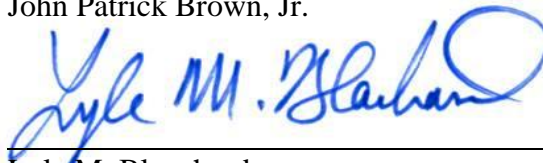
While the Text Amendment has been pending, Wesley has continued to work with the affected ANCs and other parties to refine and enhance the pending application. This community engagement which began in 2019 will continue. Prior to any resumed public hearing, Wesley will provide a complete submission on the revised Campus Plan.

Thank you for your continued attention to this case.

Very truly yours,
GREENSTEIN DELORME & LUCHS, P.C.



John Patrick Brown, Jr.



Lyle M. Blanchard

CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2024, the foregoing Applicant's Request to Resume Case was delivered via electronic mail to the following:

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