



GREENSTEIN DELORME & LUCHS, P.C.

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March 5, 2025

### **BY IZIS**

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

Re: Applicant's Request to Resume Public Hearing and

Updated Campus Plan Submission Zoning Commission Case No. 23-08(1)

Application of The Wesley Theological Seminary of the United Methodist Church

for a Campus Plan (2025-2035) 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 this long-standing Campus Plan case and proceed with continued review of this application, including the significant updates and revisions set forth below. Based on the updated application, Wesley requests that the Commission schedule a resumption of the Public Hearing at the earliest available date in April.

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 February 27, 2025, the Commission voted to take Final Action to approve the Text Amendment.

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.



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### **EXECUTIVE SUMMARY**

As a result of Wesley's ongoing evaluation of the Campus Plan and community engagement, the Seminary has adopted the following significant revisions to the pending application which are fully discussed in this letter and supporting documentation.

- Wesley 2025 Update
- Streamlined the Updated Campus Plan to include a single new building: the Proposed New Dorm
- Eliminated Top/Penthouse Level of New Dorm
- Reduced Underground Parking
- Eliminated Administration/Maintenance Building
- Reduced Total Campus Development to 1.014 FAR Leaving 300,740 sf of Allowable Unused Campus GFA
- Increased Green Open Space
- Enhanced and Updated Landscaping Plan
- Proposed Ward 3 Inclusionary Zoning Revolving Fund
- Updated Racial Equity and Comprehensive Plan Analysis

## 1. Wesley 2025 Activities Update

Wesley has come back from the effects of COVID. Over the last 2 years, enrollment has come steadily back with more in-person classes. One dorm, Straughn Hall, is now mothballed, but the other two dorms are back to full occupancy. Even though our campus is now completely open, some staff now work remotely and some are here 3 or 4 days of the week. This means we now realize there is no need for the new administration building in the original version of our Campus Master Plan, and it has been removed from the current plan. This has the effect of increasing the already ample green space and landscaping surrounding the campus. We have continued to recognize and utilize our location in Washington. In 2024, for instance, we partnered with the Washington National Cathedral and the National Governors Association to offer a series of programs to foster civil discourse in the public square. We also brought a group of pastors from around the country for intensive weeks in Washington to hone their skills in public engagement and advocacy. In the last few months, we have reached out to civil servants working in the Federal Government to offer them support as so many are losing their jobs. Many Wesley students have come from government service. Many are still in those positions as they study part time.



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# 2. <u>Eliminated Top/Penthouse Level of New Dormitory.</u>

BKV Architects undertook a detailed design evaluation of the proposed new dormitory. As a result, the top level/penthouse level of the building has been eliminated reducing the gross floor area of the building by 17,183 square feet (approximately 6%) to 282,061 square feet. Exhibit 1 (Elevations, Floor Plans, Sections, Civil Drawings). The final design layout of the housing units is continuing, but the units are expected to be more efficient and cost-effective reducing rental rates while maintaining not more than 659 beds.

This significant design change will further limit the profile and visual impact of the building as viewed from both University Avenue and Massachusetts Avenue. As shown by the attached Street Views as Exhibit 2, the new dormitory is located more than 100 yards from the eastern curb of University Avenue and visually obstructed by the existing 2014 Dorm, other Wesley buildings and the existing and proposed enhanced landscaping.

The New Dorm will be occupied exclusively by Wesley and AU students, faculty and staff (and their immediate families). The building will be LEED Gold design and incorporate a green roof and rooftop solar panels.

# 3. <u>Updated and Increased Reduction in Underground Parking.</u>

At the urging of ANC 3E, Wesley originally proposed a reduction of ninety-five (95) parking spaces in the underground parking garage. After further design review with the project architects, the underground parking plan has been revised to eliminate the northern portion/half of the two levels of parking as shown on the plans attached as <u>Exhibit 1</u>. As a result, a total of ninety-nine (99) parking spaces will be eliminated as shown in the table below:

Previous Campus Plan			<b>Updated Parking Metrics</b>			
	# Spaces	% Total	# Spaces	% Total	# Removed	% Removed
Wesley Parking	105	28.9%	77	29.1%	28	26.7%
Visitor	23	6.3%	16	6.0%	7	30.4%
Residential	235	64.7%	171	64.9%	64	27.2%
Tot/Avg	363	100.0%	264	100.0%	99	27.3%

The reduction in parking and required excavation will nominally reduce construction costs, but will result in a greater long-term loss of parking revenues from the 99 market rate parking spaces that the new dorm project will have to absorb.



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A total 295 parking spaces, including 264 underground and 31 surface spaces will be provided. Gorove-Slade has determined that implementation of the Campus plan will not increase on-street parking in the neighborhood. Additionally, Wesley and Landmark will establish and enforce rules that prohibit on-street parking by students and residents of the New Dormitory. All Wesley and New Dormitory resident vehicles will be required to register and bear campus decals to allow the identification and enforcement against vehicles parking on the restricted neighborhood streets. No student or resident on the Wesley Campus will be entitled to obtain a Residential Permit Parking decal.

### 4. <u>Elimination of Proposed Wesley Administration and Maintenance Building.</u>

Wesley has determined not to proceed with the proposed new two-story 5,297 square foot Administration/Maintenance Building that would have been located at the top of the University Avenue Driveway adjacent to the 2014 Dormitory. The administration space was determined to be unneeded and the maintenance facilities will be housed in the underground parking garage. This will further reduce the total campus development. The land area (2,711 square feet) of the proposed building will be incorporated into and expand the Green Open Space and landscaped in accordance with the revised Landscape Plan attached as Exhibit 3.

### 5. Total Campus Development Reduced to 1.014 FAR.

With the elimination of the top/penthouse level of the New Dorm and the Administration/Maintenance Building, new campus development has been reduced by 22,480 square feet of GFA. As a result, total campus development has been reduced to 387,040 square feet or 1.014 FAR which is significantly below the 1.8 FAR (687,780 sf) permitted. The table below breaks down the existing and current proposed campus development.



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

Current/Proposed Development GFA				
Building	<u>Current</u>	Proposed		
Straughn Hall	29,866 sf.	(29,866 sf.)		
Carroll Hall	27,533 sf.	(27,533 sf.)		
Old President House	4,538 sf.	(4,538 sf.)		
Library	16,630 sf.	16,630 sf.		
Trott Hall/Chapel	26,335 sf.	26,335 sf.		
Kresge	32,819 sf.	32,819 sf.		
2014 Dorm	29,195 sf.	29,195 sf.		
New Admin Building	-	-		
New Dormitory	-	282,061 sf.		
TOTAL	166,916 sf.	387,040 sf. (1.014 FAR)		
Unused Campus GFA	-	300,740 sf.		



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### 6. <u>300,740 Square Feet of Unused Campus GFA.</u>

Even with the new development proposed, the Wesley campus will be substantially underdeveloped. Another university would be entitled to an additional 300,740 square feet of GFA on the campus. This would allow additional development almost twenty percent larger than the proposed New Dorm and would likely encroach in the Green Open Space on University Avenue and Massachusetts Avenue.

### 7. Increased Green Open Space.

The hilltop campus surrounded by the Green Open Space on University Avenue and Massachusetts Avenue has for the last 65 years defined the Wesley campus and its relationship to the Spring Valley Neighborhood and served as a substantial buffer to the larger AU campus. Exhibit 4 (Existing). Generations of neighborhood residents have enjoyed the parklike setting which includes a thrilling Sledding Hill and more recently the Family Movie Nights and "Spring in the Valley" events. The Thrive in Place Campus Plan preserves and enhances the Green Open Space for current residents and future generations.

The demolition of the Old President's House (parking lot and driveway), and the elimination of the proposed Administration/Maintenance building will increase the Green Open Space and provide space for additional strategically placed landscaping. The Green Open Space will occupy more than 205,000 square feet of the Campus land area which is more than fifty-three percent (53%). Exhibit 5 (Proposed). In addition to the Green Open Space, there will be an additional 39,000 square feet of formally landscaped area.

## 8. Enhanced and Updated Landscaping Plan.

The entire Wesley campus and especially the perimeter Green Open Space enjoys a mature and well maintained forestation and landscaping, including a remarkable twenty-seven (27) Heritage and seventy-six (76) Special Trees. Exhibits 3 and 4. The updated Landscape Plan preserves, protects and builds upon the existing landscaping and enhances that landscaping with targeted new landscaping. The new Dorm and campus core will be substantially landscaped. More significantly, substantial additional landscaping will be added along University Avenue focused on the University Avenue driveway and former site of the administration/maintenance building and at the location of the Old President's House and new Neighborhood Playground. Exhibits 3 and 5. The impact of this new landscaping is to enhance the natural buffer between the Campus and the Spring Valley neighborhood.



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# 9. Proposed Ward 3 Inclusionary Zoning Revolving Fund.

As acknowledged by the Zoning Commission during their deliberations on the Text Amendment, Wesley is not an affordable housing developer and as such cannot directly create affordable housing. However, in collaboration with ANC 3E, Wesley undertook a detailed search to identify a Ward 3 development project with which it can work with to provide offsite IZ units. Upon the recommendation of DHCD and others, Wesley also enlisted the assistance of Local Initiatives Support Corporation ("LISC") to assist in this process. LISC is a nationwide affordable housing community development organization that has operated in DC for 42 years.

For a variety of reasons, this search proved unsuccessful. In addition to the high cost of Ward 3 affordable housing, limited potential sites, and increased cost of limited capital, Wesley encountered several obstacles that proved insurmountable. First, ongoing Ward 3 development projects were unwilling increase their IZ programs due to the risks and delays that would be required to modify already secured project financing and in some cases the need to modify previous discretionary zoning approvals. The former Super Fresh site is one example of a seemingly good candidate, but the developer would not risk another judicial appeal after finally resolving a previous one after a lengthy zoning approval process with persistent opposition from a small community element. One developer of an ongoing Ward 3 project with its own substantial IZ component advised that increasing IZ undermines the marketability of the project's market rate units. Finally, we learned from a number of developers that the timing of financial support offered by Wesley that would not be available until Wesley obtains its zoning approvals would be too late to impact an ongoing development project. Recently, Wesley was working with an established affordable housing developer that had identified a site on Wisconsin Avenue in Friendship Heights for a project. However, the developer needed funds for site acquisition but the need was current and Wesley's final Campus Plan and Further Processing approvals would come too late to provide Wesley with the assurances it needs to release the funds. As a result, the developer was unable to acquire the site.

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

As will be more fully documented before and during the upcoming public hearing, the proposed \$ 8 million contribution exceeds the cost of the minimum level of required IZ associated with the proposed new Dormitory and should be sufficient to subsidize at least the minimum level of required IZ over time in compliance with the Wesley text amendment.



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# 10. <u>Updated Racial Equity and Comprehensive Plan Analysis.</u>

The campus plan for Wesley Theological Seminary ("Wesley") has been evaluated through a racial equity lens, focusing on consistency with the D.C. Comprehensive Plan ("Comp Plan") and the Zoning Commission's Racial Equity Tool. Exhibit 6. The analysis assesses the proposed dormitory's impact on housing, displacement, access to opportunities, environmental changes, and community engagement to ensure equitable development.

### **Key Findings:**

### Housing and Displacement

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

### • Physical Improvements and Sustainability

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

### Access to Opportunities

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



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### • Community Engagement and Priorities

- o 18 Community Liaison Meetings and 20 ANC Meetings (2019-2024) informed the planning process.
- Community feedback led to significant modifications, including a reduction in building height, increased setbacks, and adjustments to the dormitory's top floor design to minimize visual impact.
- o The proposed campus plan aligns with local priorities by ensuring institutional expansion does not negatively affect the surrounding neighborhood.
- o In conclusion, the proposed campus plan aligns with the Comp Plan's goals and advances racial equity by increasing on-campus student housing, enhancing environmental sustainability, improving access to opportunities, and responding to community priorities. The project mitigates displacement risks and promotes equitable development, benefiting both the student population and the surrounding neighborhood.

Based on the updated and revised details presented here, Wesley has updated the following Exhibits that were included in the original Campus Plan application (ZC Exhibits 3A - 3E3), including:

Exhibit E: Site Zoning Plan Exhibit H1: Landscape Plan Exhibit H2: Landscape Plan

Exhibit J: Existing and Proposed Property Boundary

Exhibit K: Existing Zoning
Exhibit L: Existing Land Use

Exhibit M: Existing Building Use and Infrastructure

Exhibit N: Existing Building Heights

Exhibit O: Existing Open Space and Pedestrian System
Exhibit P: Proposed Open Space and Pedestrian System

Exhibit Q: Existing Site Amenities

Exhibit R: Existing Vehicle Circulation Network
Exhibit S: Proposed Vehicle Circulation Network

Exhibit U: Proposed Land Use

Exhibit V: Proposed Building and Infrastructure

Exhibit W: Proposed Building Heights Exhibit X: Proposed Site Amenities



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As required, Wesley will submit a further prehearing submission in advance of the resumed public hearing.

Very truly yours,

GREENSTEIN DELORME & LUCHS, P.C.

John Patrick Brown, Jr.

Lyle M. Blanchard

### **CERTIFICATE OF SERVICE**

I hereby certify that on March 5, 2025, the foregoing Applicant's Request to Resume Public Hearing was delivered via electronic mail to the following:

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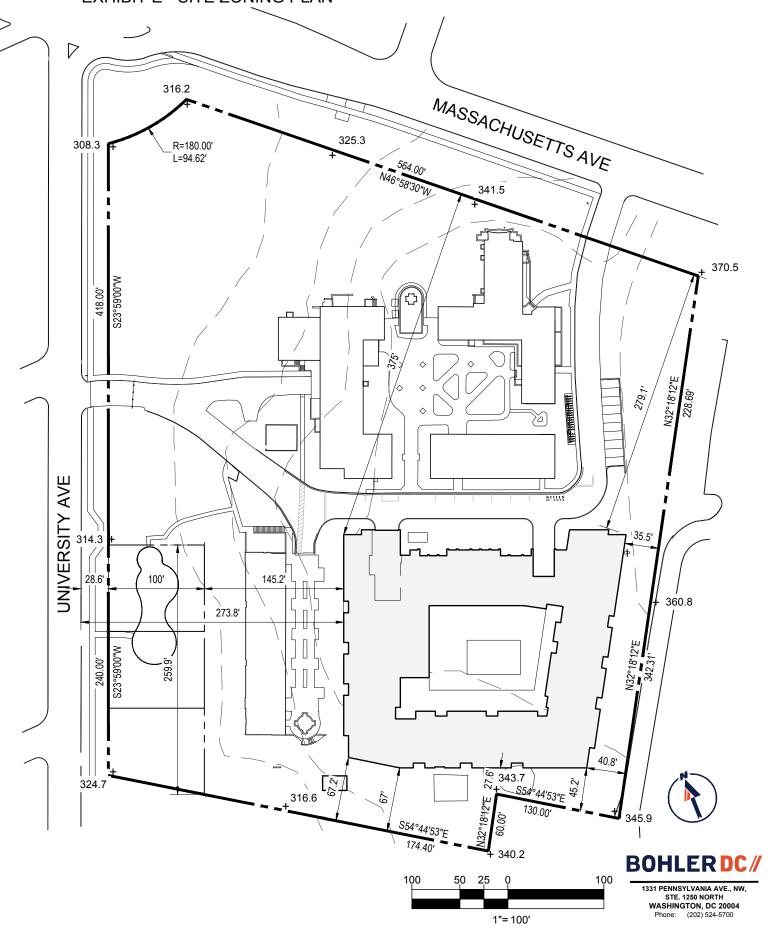
Thomas M. Smith

Neighbors for a Livable Community/Spring Valley – Wesley Heights Citizens Association tmfsmith@rcn.com



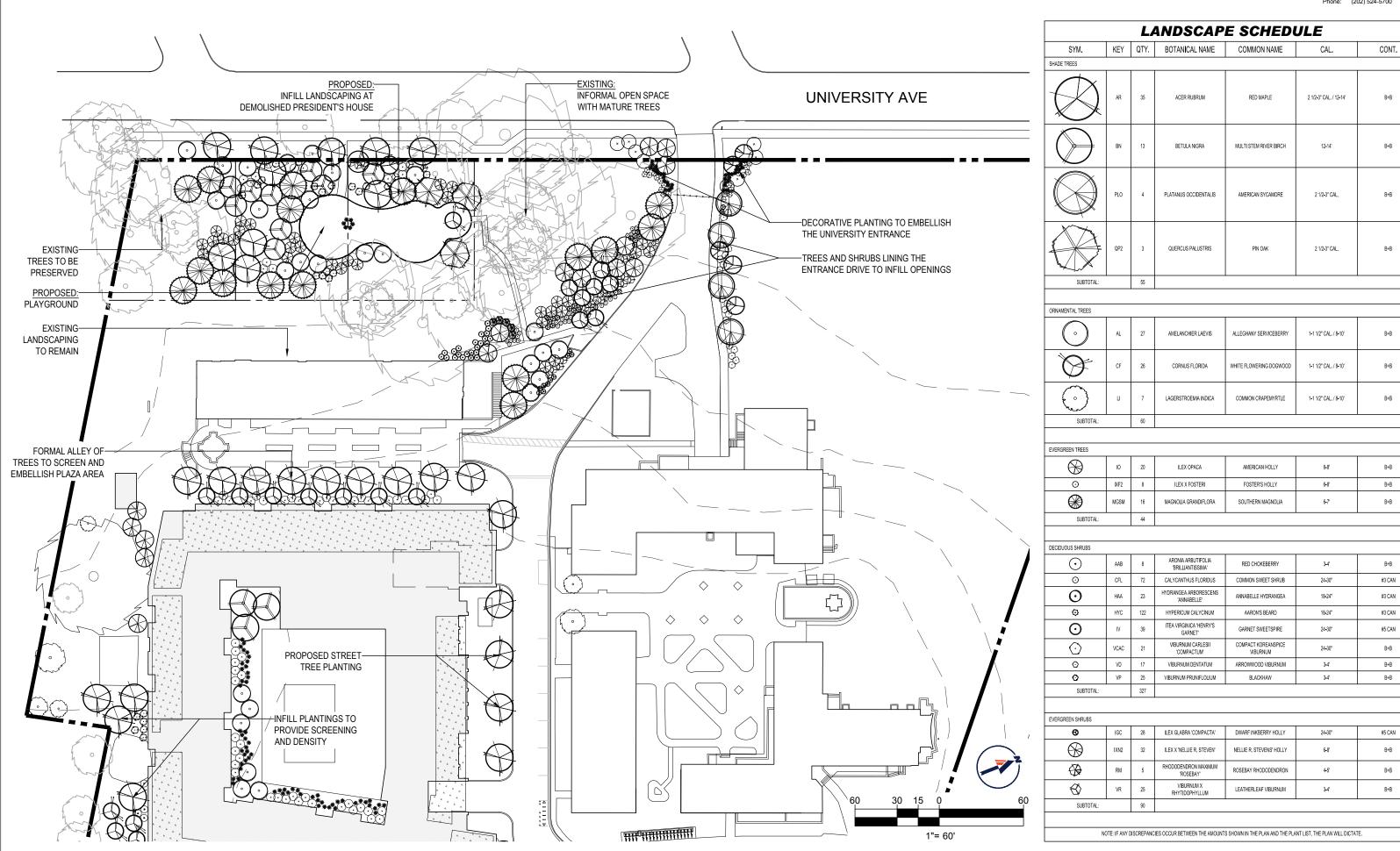
# EXHIBITS EXHIBITS

# WESLEY SEMINARY CAMPUS PLAN EXHIBIT E - SITE ZONING PLAN



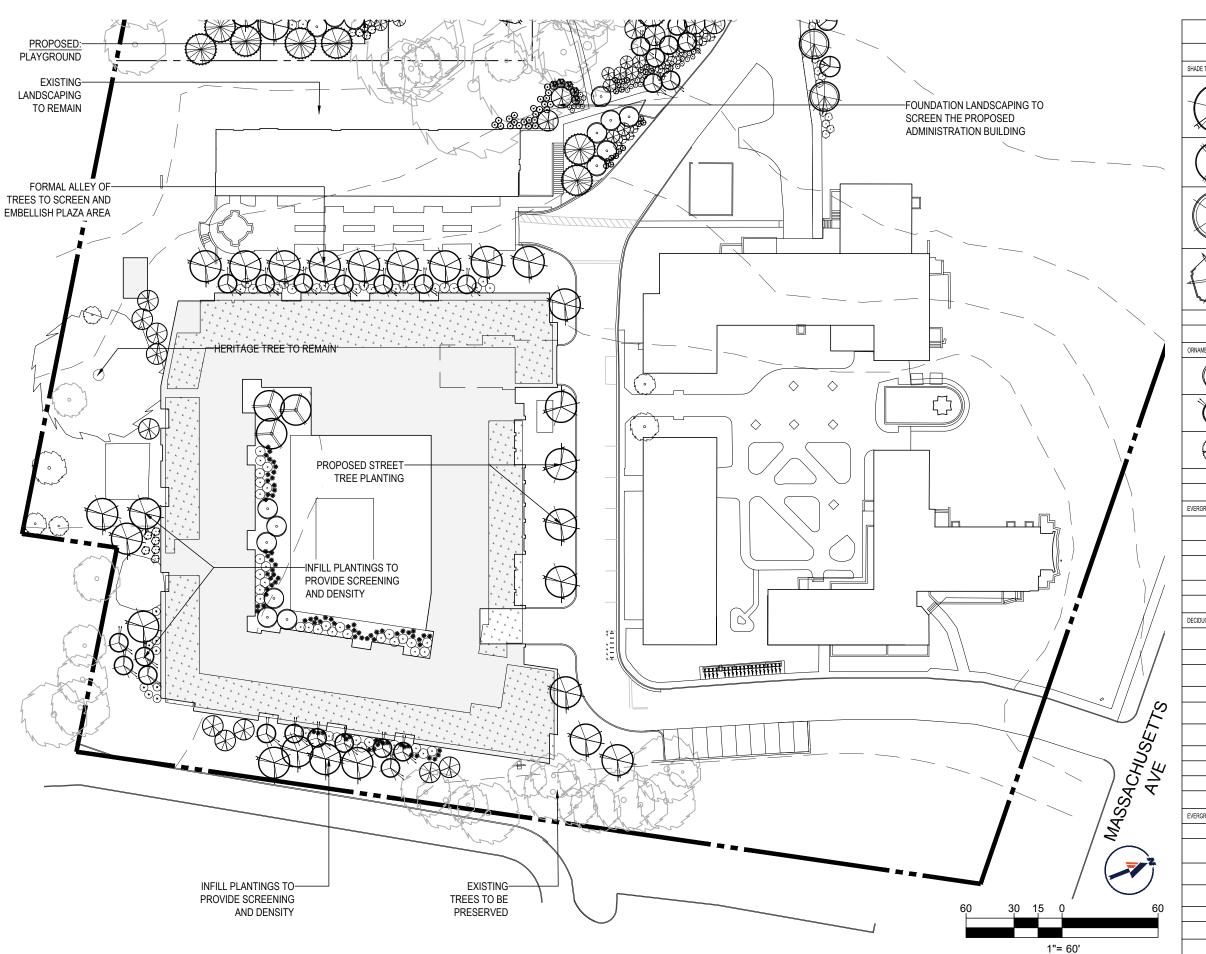
# WESLEY SEMINARY CAMPUS PLAN EXHIBIT H1 - LANDSCAPE PLAN





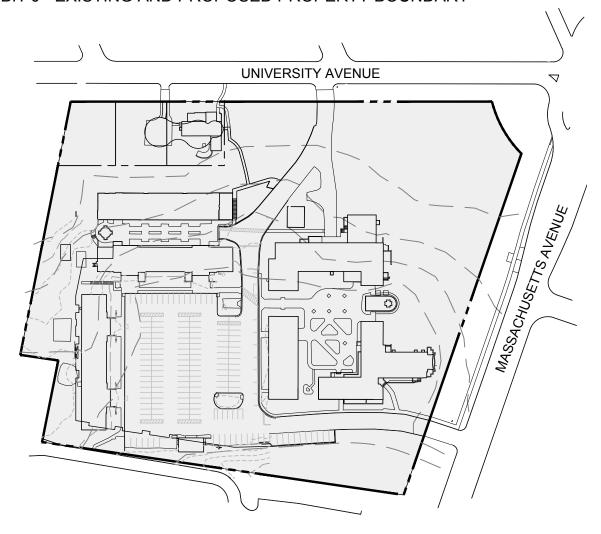
# WESLEY SEMINARY CAMPUS PLAN EXHIBIT H2 - LANDSCAPE PLAN





		L	ANDSCAP	E SCHEDU	JLE	
SYM.	KEY	QTY.	BOTANICAL NAME	COMMON NAME	CAL.	CONT.
ADE TREES						
	AR	35	ACER RUBRUM	RED MAPLE	2 1/2-3" CAL. / 12-14"	B+B
	BN	13	BETULA NIGRA	MULTI STEM RIVER BIRCH	12-14'	B+B
	PLO	4	PLATANUS OCCIDENTALIS	AMERICAN SYCAMORE	2 1/2-3" CAL.	B+B
	QP2	3	QUERCUS PALUSTRIS	PIN OAK	2 1/2-3" CAL.	B+B
SUBTOTAL:		55				
NAMENTAL TREES						
$\bigcirc$	AL	27	AMELANCHIER LAEVIS	ALLEGHANY SERVICEBERRY	1-1 1/2" CAL. / 8-10'	B+B
0	CF	26	CORNUS FLORIDA	WHITE FLOWERING DOGWOOD	1-1 1/2" CAL. / 8-10'	B+B
$\odot$	LI	7	LAGERSTROEMIA INDICA	COMMON CRAPEMYRTLE	1-1 1/2" CAL. / 8-10'	B+B
SUBTOTAL:		60				
RGREEN TREES				ı		
<b>W</b>	10	20	ILEX OPACA	AMERICAN HOLLY	6-8'	B+B
0	IXF2	8	ILEX X FOSTERI	FOSTER'S HOLLY	6-8'	B+B
$\otimes$	MGSM	16	MAGNOLIA GRANDIFLORA	SOUTHERN MAGNOLIA	6-7'	B+B
SUBTOTAL:		44				
DUOUS SHRUBS	Ι		ARONIA ARBUTIFOLIA			
<u>.</u>	AAB	8	'BRILLIANTISSIMA'	RED CHOKEBERRY	3-4'	B+B
<u> </u>	CFL	72	CALYCANTHUS FLORIDUS HYDRANGEA ARBORESCENS	COMMON SWEET SHRUB	24-30"	#3 CAN
<u> </u>	HAA	23	'ANNABELLE'	ANNABELLE HYDRANGEA	18-24"	#3 CAN
Ø	HYC	122	HYPERICUM CALYCINUM	AARON'S BEARD	18-24"	#3 CAN
0	IV	39	ITEA VIRGINICA 'HENRY'S GARNET'	GARNET SWEETSPIRE	24-30"	#5 CAN
$\odot$	VCAC	21	VIBURNUM CARLESII 'COMPACTUM'	COMPACT KOREANSPICE VIBURNUM	24-30"	B+B
0	VD	17	VIBURNUM DENTATUM	ARROWWOOD VIBURNUM	3-4'	B+B
0	VP	25	VIBURNUM PRUNIFLOLIUM	BLACKHAW	3-4'	B+B
SUBTOTAL:		327				
ODEEN CURVES	IGC	28	ILEX GLABRA 'COMPACTA'	DWARF INKBERRY HOLLY	24-30"	#5 CAN
RGREEN SHRUBS		32	ILEX X 'NELLIE R. STEVEN' RHODODENDRON MAXIMUM	NELLIE R, STEVENS' HOLLY  ROSEBAY RHODODENDRON	6-8' 4-5'	B+B B+B
ERGREEN SHRUBS	IXN2	5	'ROSEBAY'			
		5 25	'ROSEBAY' VIBURNUM X	LEATHERLEAF VIBURNUM	3-4'	B+B
	RM		'ROSEBAY'	LEATHERLEAF VIBURNUM	3-4'	B+B

# WESLEY SEMINARY CAMPUS PLAN EXHIBIT J - EXISTING AND PROPOSED PROPERTY BOUNDARY



KEY				
	PROPERTY OWNED BY WESLE	EY THEOLOGIC	CAL SEMINARY	
	CAMPUS BOUNDARY	150	75 37.5 0	150
			1"=150'	

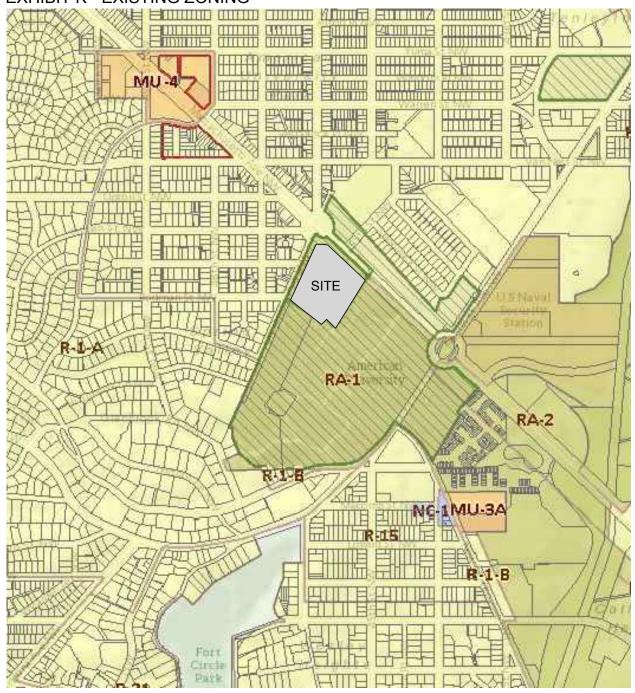
NOTE

PROPERTY BOUNDARY SHOWN REFLECTS EXISTING AND PROPOSED, AS NO CHANGES ARE INTENDED. SITE AMENITIES ARE SHOWN AS THEY ARE PROPOSED.



# WESLEY SEMINARY CAMPUS PLAN

## **EXHIBIT K - EXISTING ZONING**



**KEY** 



RESIDENTIAL APARTMENT ZONE



CAMPUS PLANS

MIXED-USE ZONE

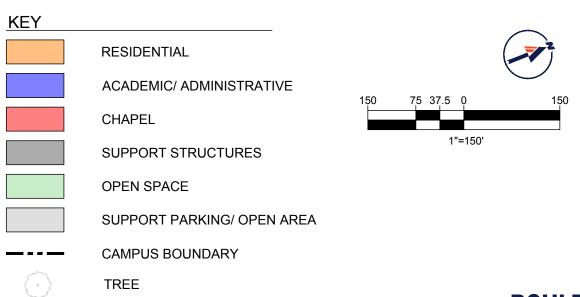
NEIGHBORHOOD MIXED-USE ZONE





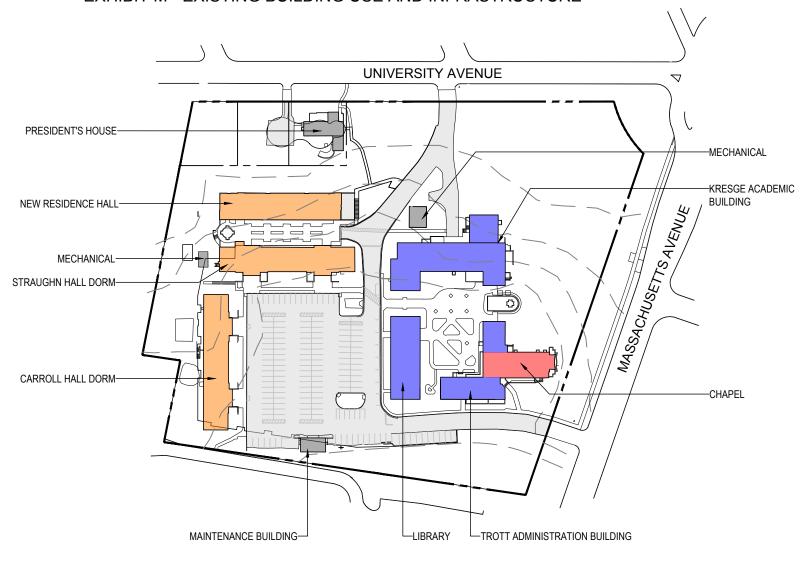
# WESLEY SEMINARY CAMPUS PLAN EXHIBIT L - EXISTING LAND USE

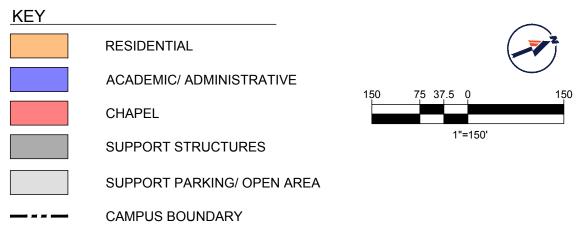






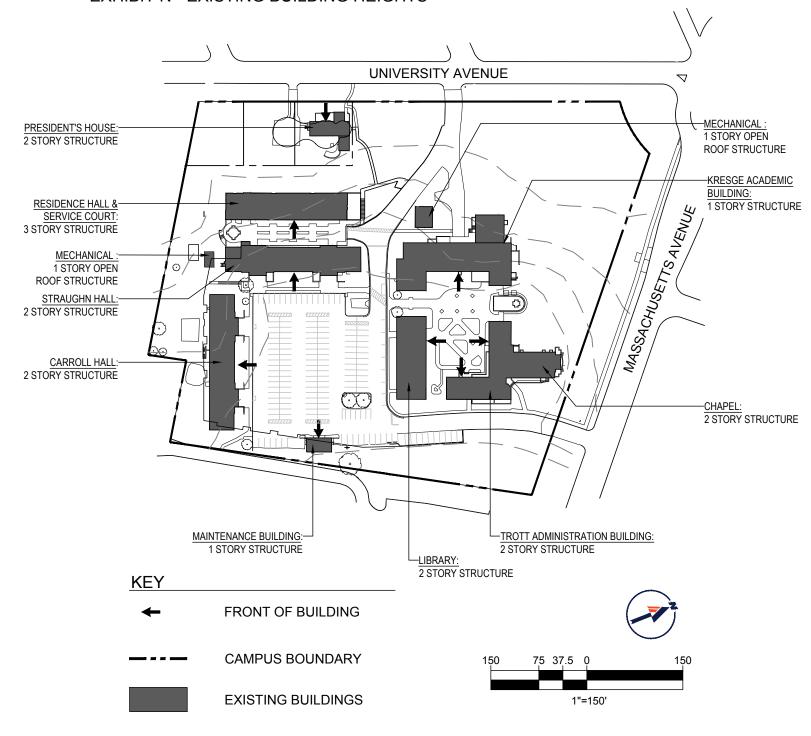
# WESLEY SEMINARY CAMPUS PLAN EXHIBIT M - EXISTING BUILDING USE AND INFRASTRUCTURE







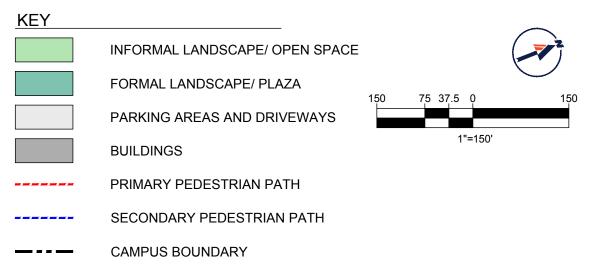
# WESLEY SEMINARY CAMPUS PLAN EXHIBIT N - EXISTING BUILDING HEIGHTS





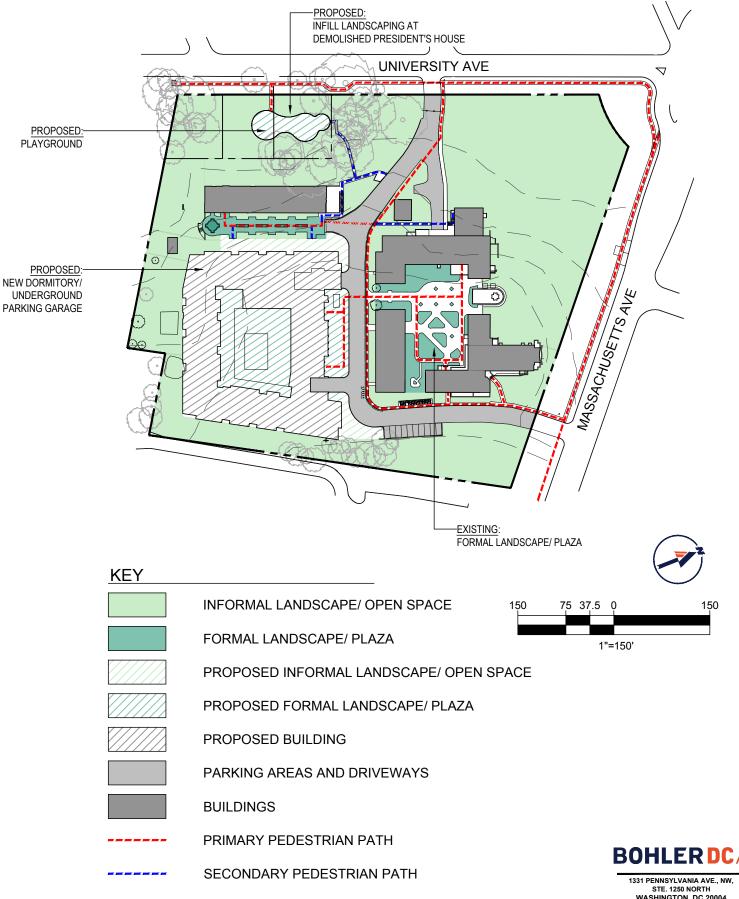
# WESLEY SEMINARY CAMPUS PLAN EXHIBIT O - EXISTING OPEN SPACE AND PEDESTRIAN SYSTEM







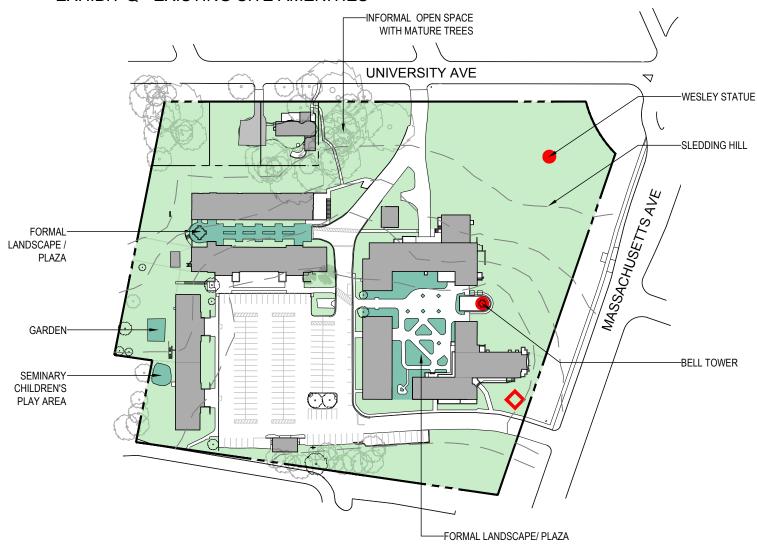
# WESLEY SEMINARY CAMPUS PLAN EXHIBIT P - PROPOSED OPEN SPACE AND PEDESTRIAN SYSTEM

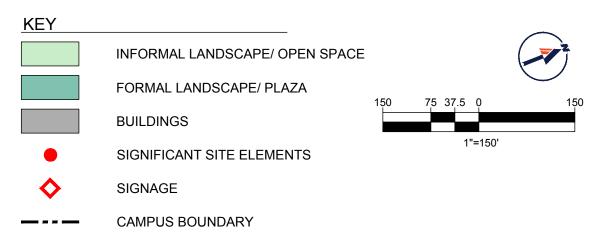


**CAMPUS BOUNDARY** 



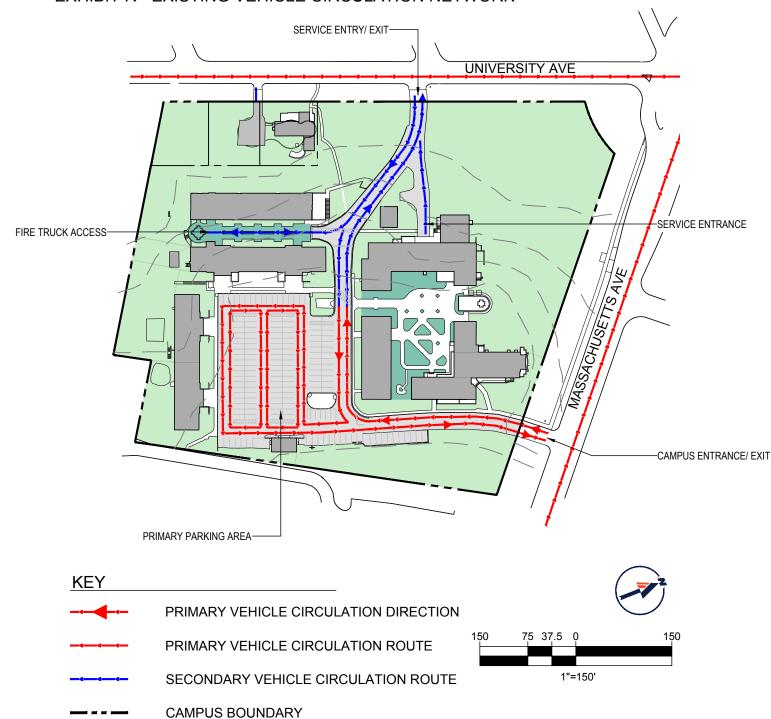
# WESLEY SEMINARY CAMPUS PLAN EXHIBIT Q - EXISTING SITE AMENITIES





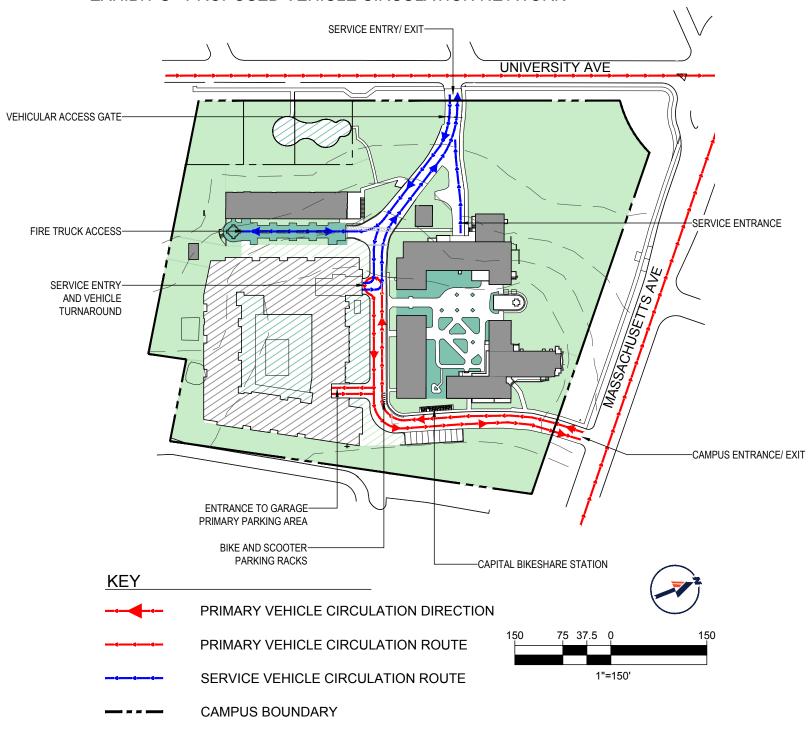


# WESLEY SEMINARY CAMPUS PLAN EXHIBIT R - EXISTING VEHICLE CIRCULATION NETWORK



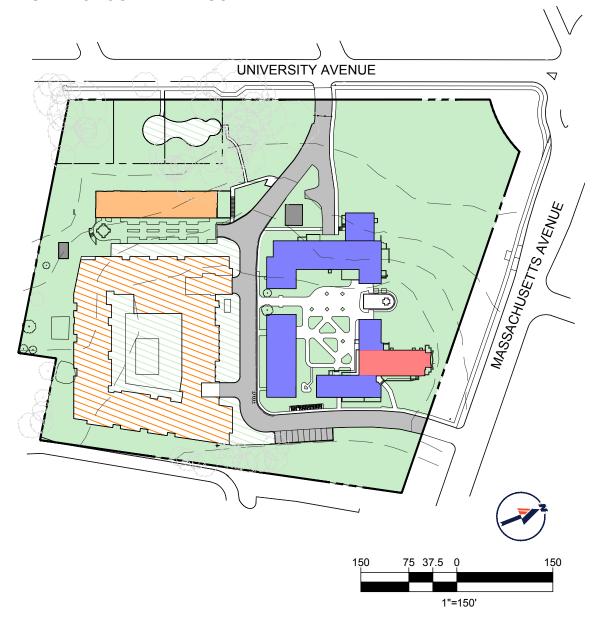


# WESLEY SEMINARY CAMPUS PLAN EXHIBIT S - PROPOSED VEHICLE CIRCULATION NETWORK





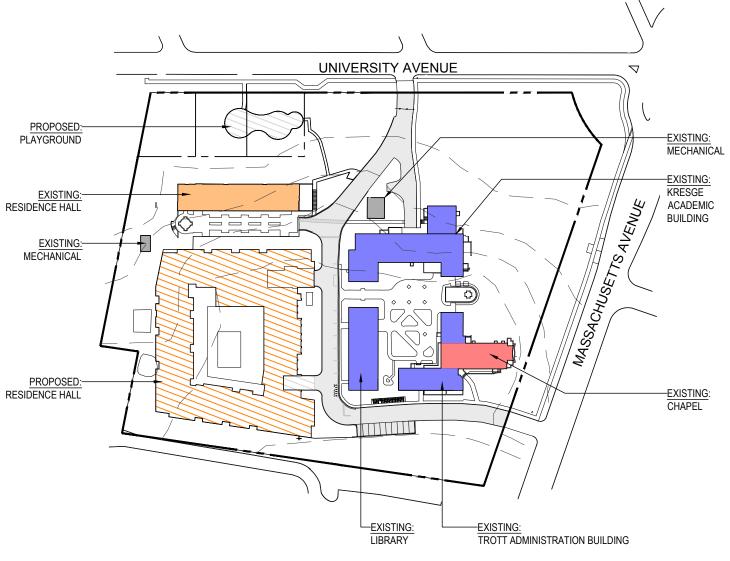
# WESLEY SEMINARY CAMPUS PLAN EXHIBIT U - PROPOSED LAND USE

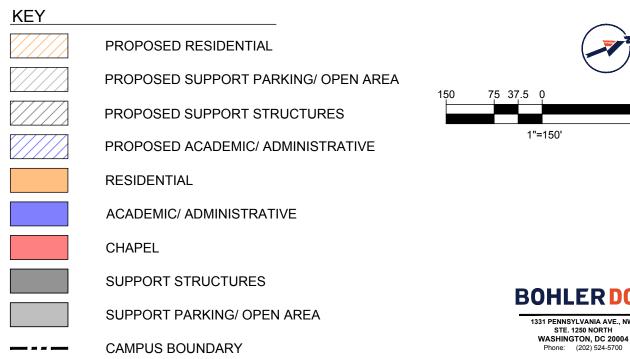


KEY		
	PROPOSED RESIDENTIAL	RESIDENTIAL
	PROPOSED OPEN SPACE	ACADEMIC/ ADMINISTRATIVE
	PROPOSED SUPPORT PARKING/ OPEN AREA	CHAPEL
	PROPOSED SUPPORT STRUCTURE	SUPPORT STRUCTURES
	PROPOSED ACADEMIC/ ADMINISTRATIVE	SUPPORT PARKING/ OPEN AREA
	CAMPUS BOUNDARY	OPEN SPACE
	TREE	



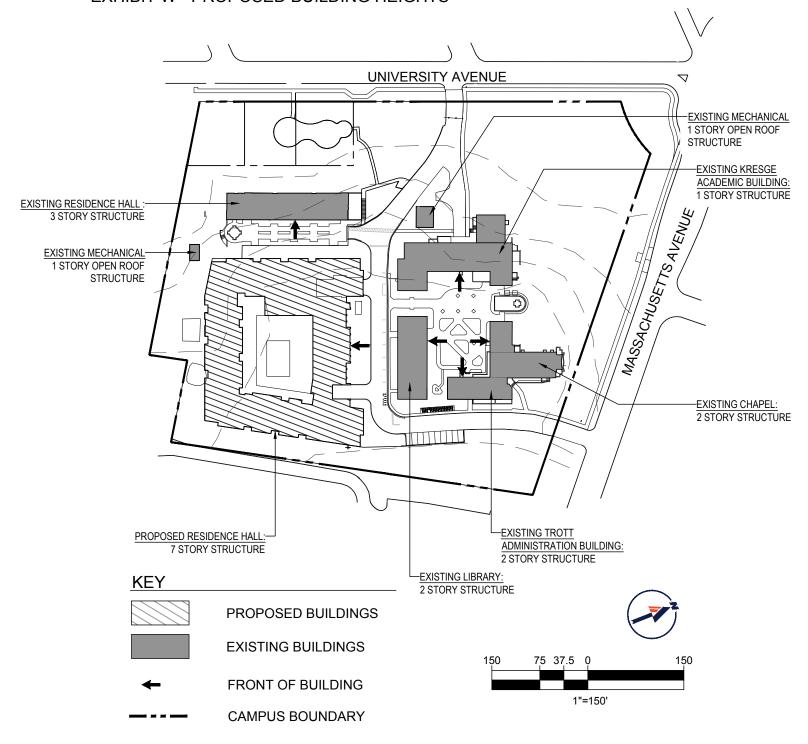
# WESLEY SEMINARY CAMPUS PLAN EXHIBIT V - PROPOSED BUILDING USE AND INFRASTRUCTURE





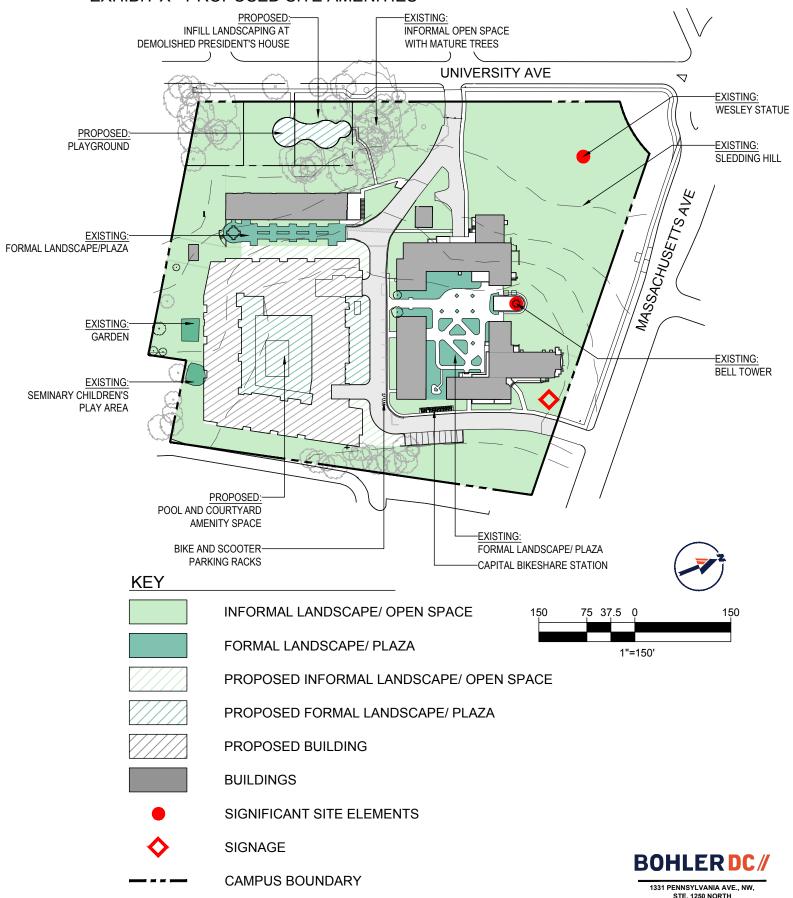
150

# WESLEY SEMINARY CAMPUS PLAN EXHIBIT W - PROPOSED BUILDING HEIGHTS





# WESLEY SEMINARY CAMPUS PLAN EXHIBIT X - PROPOSED SITE AMENITIES



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