

EXHIBIT 6

1 Executive Summary

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

Key Findings:

- Housing and Displacement
 - The proposed dormitory will replace two existing dormitories, increasing capacity from 90 student beds to 659 without causing direct displacement.
 - Indirect displacement is not anticipated, as increased on-campus student housing will reduce pressure on the surrounding rental market.
 - The plan supports the Comp Plan’s goal of expanding affordable housing by freeing up lower-cost housing in adjacent neighborhoods.
- Physical Improvements and Sustainability
 - The project will incorporate green infrastructure, including a green roof, solar panels, stormwater management systems, bioretention facilities, and tree preservation efforts.
 - The dormitory is designed to achieve LEED Mid-Rise Residential Gold certification, ensuring energy efficiency and the use of environmentally preferred materials.
 - Public space improvements will include landscaping along University Avenue, creating a more pedestrian-friendly environment.
- Access to Opportunities
 - The dormitory’s proximity to the Tenleytown-AU Metro station and other transit options will enhance student access to jobs, services, and entertainment across the District.
 - The project will maintain and expand on-campus employment opportunities and continue to train students for religious and social service careers.
 - Access to recreational spaces, including a new neighborhood playground, Rock Creek Park, and the Friendship Recreation Center, will provide additional community benefits.
- Community Engagement and Priorities

- o 18 Community Liaison Meetings and 20 ANC Meetings (2019-2024) informed the planning process.
- o 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.

Conclusion

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

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1 Introduction

1.1 Purpose of the Report

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

1.2 The Zoning Commission and Racial Equity

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

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

1.3 Project Summary

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

2 Part One: Comprehensive Plan and Racial Equity Analysis

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

2.1 Future Land Use Map

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

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

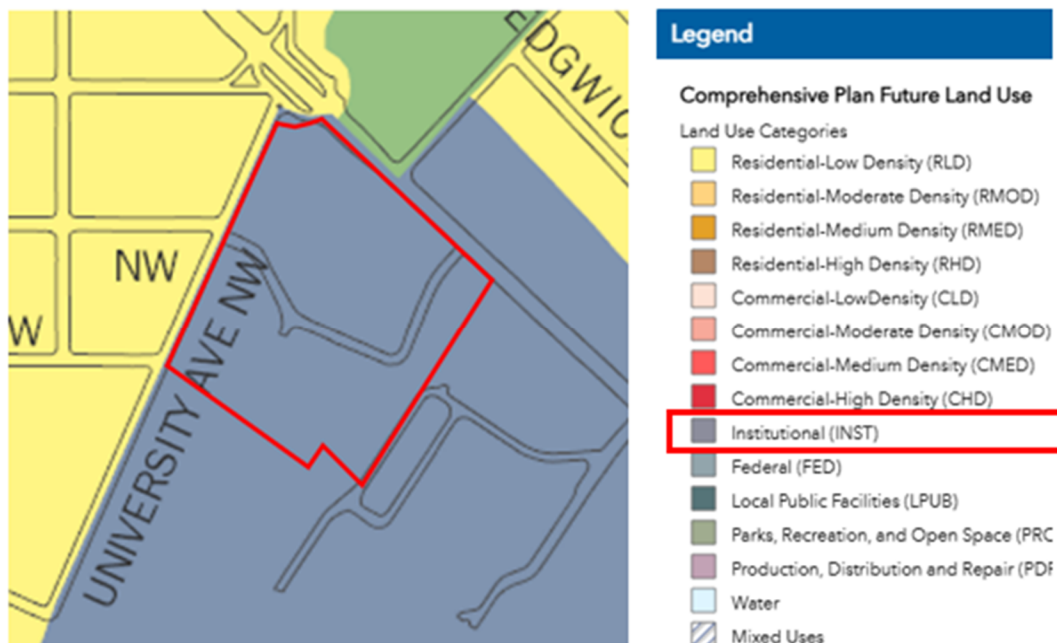


FIGURE 1: FUTURE LAND USE MAP

The Framework Element describes this designation as follows:

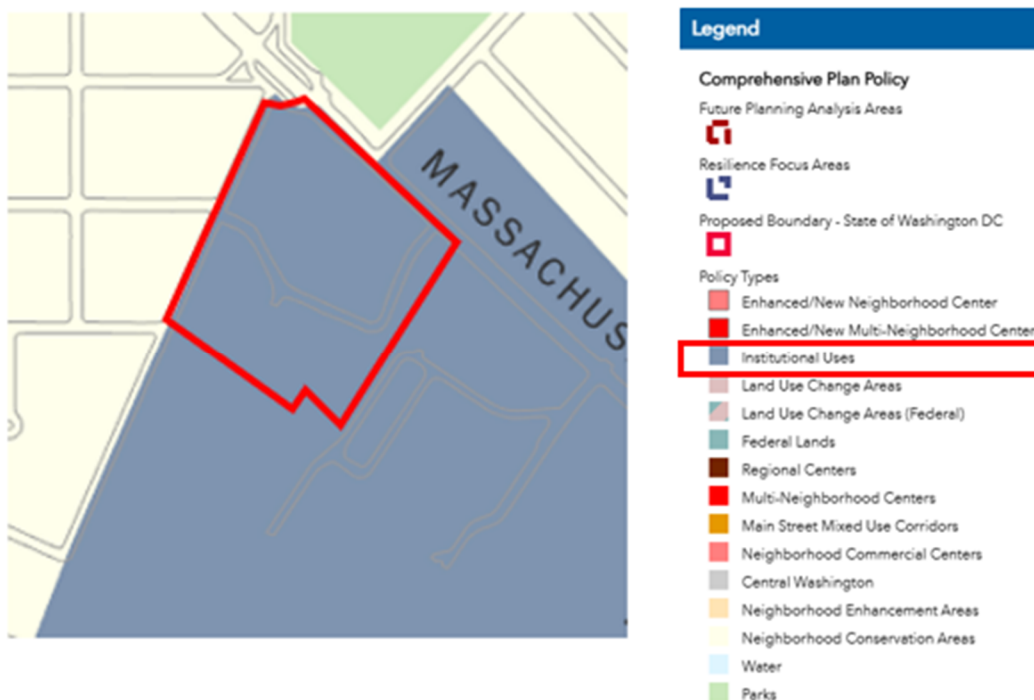
- **Institutional**: This designation includes land and facilities occupied and used by colleges and universities, large private schools, hospitals, religious organizations, and similar institutions. While included in this category, smaller institutional uses such as churches are generally not mapped,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

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

2.2 Generalized Policy Map

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

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



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

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

2.3 Citywide Elements

2.3.1 Land Use Element

Comprehensive Plan Analysis

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

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

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

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

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

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

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

Racial Equity Analysis

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

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

2.3.2 Transportation Element

Comprehensive Plan Analysis

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

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

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

Racial Equity Analysis

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

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

2.3.3 Housing Element

Comprehensive Plan Analysis

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

Racial Equity Analysis

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

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

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

2.3.4 Environmental Protection Element

Comprehensive Plan Analysis

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

Racial Equity Analysis

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

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

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

2.3.5 Educational Facilities Element

Comprehensive Plan Analysis

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

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

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

Racial Equity Analysis

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

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

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

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

2.3.6 Rock Creek Park West Area Element

Comprehensive Plan Analysis

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

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

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

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

Racial Equity Analysis

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

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

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

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

3 Part Two: Community Outreach and Engagement

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

3.1 Impacted Community(ies)

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

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

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

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

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

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

3.2 Analysis of Past and Present Racial Discrimination / Harm

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

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

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

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

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

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

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

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

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

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

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

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

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

3.3 Summary of Community Outreach Efforts

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

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

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

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

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

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

3.4 Community Priorities and Impact on the Zoning Action

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

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

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

10A DCMR § 2307.4

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

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

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

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

4 Part Three: Disaggregated Data Regarding Race and Ethnicity

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

5 Part Four: Zoning Commission Evaluation

5.1 Direct Displacement

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

5.2 Indirect Displacement

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

5.3 Housing

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

5.4 Physical

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

5.5 Access to Opportunity

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

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

5.6 Community

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

6 Conclusion

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

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

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

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

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

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