



THE WESLEY THEOLOGICAL SEMINARY



PRE-HEARING STATEMENT FOR A CAMPUS PLAN TO THRIVE IN PLACE YEAR 2025 THROUGH 2035 Z.C. CASE NO. 23-08(1)

APRIL 11, 2025

ZONING COMMISSION
District of Columbia
CASE NO.23-08(1)
EXHIBIT NO.82

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The figure of Christ on the exterior wall of the chapel facing Massachusetts Avenue was carved on site.

EXECUTIVE SUMMARY

SUMMARY OF THIS APPLICATION

In 2006, the Wesley Theological Seminary of The United Methodist Church (“Wesley Seminary”) obtained approval for its first Campus Plan (2006-2015). Since then, changing circumstances required Wesley Seminary to reevaluate and restructure its original Campus Plan on several occasions. Through this process, Wesley Seminary has successfully evolved in its educational mission and facilities to serve that mission: *The mission of Wesley Theological Seminary is to equip persons for Christian ministry and leadership in the church and the world, to advance theological scholarship, and to model a prophetic voice in the public square.*

This new Campus Plan for 2025 through 2035 and beyond (“2025 Plan”), provides facilities and resources for Wesley Seminary to Thrive in Place as one of the top thirty theological seminaries and continue its leadership locally, regionally, nationally, and internationally.

CAMPUS PLAN (2006-2015)

In 2006, the Zoning Commission in Z.C. Case No. 05-40 approved Wesley Seminary’s first Campus Plan, which supported its academic and religious mission with a 21st century campus achieved by a combination of renovation, demolition, and new construction while maintaining the scale and feel of the existing hilltop campus. That Plan maintained the current level of enrollment and added 72,500 square feet of gross floor area. Approximately 30,000 square feet of Residential Space; approximately another 30,000 square feet of Academic Space; approximately 5,000 square feet of Chapel Space; and 7,500 square feet of Support Space were to be added to the Campus.

CHANGING CIRCUMSTANCES RESULT IN A RE-EVALUATION OF THE CAMPUS PLAN

The original Campus Plan was an ambitious and aspirational vision for the Seminary, including a substantially enlarged library. A revolution in digital resources, the advent of online educational modalities, a prolonged economic downturn, declining enrollment, and changes in theological education forced a re-evaluation of that Campus Plan. While the Campus Plan was being restructured, Wesley Seminary continued to invest in its facilities and programs, including an upgrade of its underground utilities, removal and/or remediation of all asbestos, establishing the “Wesley at Mount Vernon Square” offsite facility, and renovations of the existing Library and Chapel.

AMENDED CAMPUS PLAN (2012-2025)

Approved in Z.C. Case 05-40A, this Plan was developed to meet the Seminary’s strategic vision with more limited resources and evolving needs. The approved amendment and extension of the original Campus Plan until 2025 maintained the levels of student, faculty, and staff, but substantially reduced the previously approved new construction. The existing Campus facilities were maintained without demolition and several previously approved new buildings were eliminated. The only addition to the Campus was the new 3-story, 76 bed Residence Hall that was opened in 2014 (“2014 Dorm”). Additionally, the two existing 1960-era residential buildings, Chapel and Library were renovated, all buildings were made handicapped accessible, major renovation and “greening” of utilities was accomplished, and IT was brought to current standards. Surface parking was increased, and other campus enhancements were made.

MODIFICATION OF CAMPUS PLAN (2016-2019)

In 2016, in the aftermath of the economic recovery from 2008, nationwide seminary enrollment continued to be weak and in decline. Despite its top-tier reputation and unique location, Wesley Seminary was not immune from this trend. In Zoning Commission Order No. 05-40B, the Zoning Commission authorized Wesley Seminary to allow up to fifty-five (55) non-Wesley graduate students to occupy Straughn Hall through May 2019.

MODIFICATION OF CAMPUS PLAN (2017-2019)

In Zoning Commission Case No. 05-40C, the Zoning Commission approved the expansion of housing on campus for non-Wesley graduate students. Through December 2019, fifty-five (55) non-Wesley graduate students were permitted in Straughn Hall, six (6) in Carroll Hall, and twenty-six (26) in the New Residence Hall.

MODIFICATION OF CAMPUS PLAN (2019-2020)

Wesley requested, and the Zoning Commission in Case Number 05-40D approved a one-year extension of its current Campus Plan under the existing conditions until December 31, 2020.

AUTOMATIC AND ADMINISTRATIVE TIME EXTENSIONS.

As a result of the COVID-19 pandemic and the D.C. public health emergency, the Zoning Commission automatically extended the current Campus Plan six-months until June 30, 2021. Wesley Seminary requested and received an additional six-month extension until December 31, 2021 by Zoning Commission Order No. 05-40-D(1). In order to continue its community engagement process, Wesley Seminary requested and received an additional six-month extension until June 30, 2022, in Zoning Commission Order No. 05-40D(2).

ORIGINAL CAMPUS PLAN APPLICATION

On March 17, 2022, Wesley filed its original new Campus Plan application as Zoning Commission Case No. 22-13. The Zoning Commission conducted a Public Hearing on June 13, 2022, received numerous post-hearing submissions from the parties, and discussed this application at several Public Meetings without taking Final Action. At its November 11, 2022, Public Meeting, the Commission deferred further action on this pending application and allowed the Seminary to file a Planned Unit Development application for the proposed Campus Plan project.

On March 31, 2023, Wesley filed the PUD application as Zoning Commission Case No. 23-08 (“PUD Application”). On May 25, 2023, the Commission voted to set down the PUD Application for a Public Hearing. At the same time, the Commission advised Wesley to withdraw the current Campus Plan application (ZC Case No. 22-13) and file this new Campus Plan application to be processed in conjunction with and parallel to the pending PUD Application. The Zoning Commission conducted two public hearings in the parallel Campus Plan and PUD Applications and several public meetings. On May 4, 2024, the Zoning Commission determined to hold the Campus Plan application “in abeyance” to allow the directly related Text Amendment Petition (Z.C. 24-09) to progress through the rulemaking process. The PUD application was subsequently withdrawn at the direction of the Zoning Commission as moot.

TEXT AMENDMENT PETITION

On May 30, 2024, Wesley filed a Petition for Text Amendments to Subtitle C, Sec. 1006.6(c) and Subtitle X, Sec. 101 as allowed by the Zoning Commission to facilitate further

review of the Campus Plan. On July 25, 2024, with the recommendation of OP, the text amendment was set down for a public hearing which occurred on November 18, 2024. The Zoning Commission took Proposed Action on December 19, 2024. On February 27, 2025, the Zoning Commission took Final Action to approve the amended text amendments to add a new Subtitle C, Sec. 1006.10 and new Subtitle X, Sec. 101.5.

NEW - THRIVE IN PLACE CAMPUS PLAN (2025–2035)

The 2025 Plan is a continued commitment by Wesley Seminary, a leading national and international theological educational institution, to its Spring Valley Campus and its role in Washington, D.C., regionally, nationally and internationally. This Plan will allow Wesley Seminary to “Thrive in Place” for the long-term.

The 2025 Plan proposes to demolish two 1960 - era dormitories (Straughn Hall and Carroll Hall) with ninety beds and demolish the Old President’s House (including parking area, driveway and curb cut) on University Avenue and re-landscape that area, including a small neighborhood playground. The existing surface parking lot (143 spaces) and adjacent one-story maintenance building will be demolished and replaced with a new dormitory with approximately 659 beds and 264 underground parking spaces to be constructed by Landmark Properties, a leading nationwide student housing provider, under a long-term ground lease with Wesley Seminary. This new dormitory will be offered exclusively to Wesley Seminary students, faculty and staff (and their immediate families) and to American University students, faculty and staff (and their immediate families) needing local housing. A new two-story residential scale and design administrative building with a lower-level maintenance facility originally proposed to be constructed at the top of the University Avenue driveway adjacent to the New Residence Hall

constructed in 2014 was recently eliminated from the current plan. The other existing Wesley Seminary buildings, including Kresge Academic Hall, Trott Administration Building and Chapel, Library, and New Residence Hall, will remain in place as the perimeter of the existing hilltop campus.

The 2025 Plan will maintain, increase, and enhance the existing Green Open Space Area Buffer with the adjoining neighborhoods on University and Massachusetts Avenues. Fully 53% (205,000 square feet) of the Campus area will remain Green Open Space. The total gross floor area proposed will result in a total floor area ratio (“FAR”) of approximately 1.014, well below the maximum 1.8 FAR permitted for a campus. No further development of the property is contemplated. Approximately 300,740 square feet of the available gross floor area will not be developed.

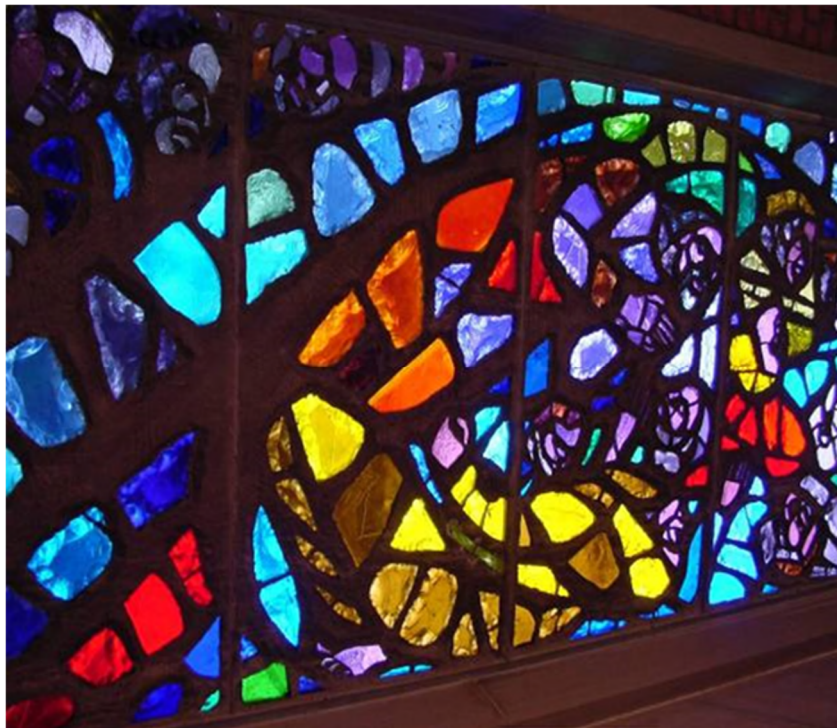
INTRODUCTION TO WESLEY THEOLOGICAL SEMINARY

Wesley Theological Seminary, founded in 1882, is one of the nation’s leading and largest graduate theological schools (most of which are known as “seminaries” or “divinity schools”). Wesley moved to this campus 67 years ago from what is now McDaniel University in Westminster, Maryland. Most of the current buildings were constructed at that time, except for the 2014 Dorm. All other buildings are renovated.

Wesley Seminary came to this site on what is now Wesley Circle and designed our campus to share this academic hilltop with American University, a sister school in The United Methodist denomination. This was part of a larger plan of a Methodist Bishop who chaired the boards of both schools and who also established the A.U. School of International Service and

relocated Sibley Hospital with a vision for a “Methodist Center” in this region, joining with the National United Methodist Church in Wesley Heights.

Wesley is considered one of the few truly national and international seminaries. Center-progressive and one of the most ethnically diverse, our alumni serve as pastors and leaders of non-profit human service organizations around the world, including a strong presence here in Washington. We are broadly ecumenical, with students from 26 denominations and a similar number of both states and foreign countries. We offer three Master’s degrees and a Doctor of Ministry (D.Min.), and several non-degree programs, with three substantial centers of research and teaching: Leadership, Arts and Religion, and Community Engagement. Our current (Spring 2025) enrollment is 250 Masters students and 223 D.Min. students. Pre-Covid, two-thirds of Master’s students commuted. D.Min. students come to campus for two-week intensive sessions between regular semesters, while some special tracks meet overseas.



The stained glass windows in the chancel of the chapel depict Christ’s ministry and its extension on the world.

Since 1958, the Spring Valley campus has been an academic oasis in the midst of and benefiting from the unique cultural diversity and excitement of the Nation's Capital. Wesley Seminary offers a variety of programs and experiences, including masters and doctoral degree programs and important non-degree programs which respond to the diverse needs of our student body and their individual ministries. The Seminary has also become a center for theological research as a resource not only for the campus, but on a much broader basis regionally, nationally, and internationally. As some universities are designated "R1" research institutions, Wesley can also be thought of this way with a high level of research activity, focused on the vitality of congregations and faith-based organizations, serving them similar to University agricultural extension programs.

The Seminary Campus is deceiving. Although outwardly tranquil and relaxed, it is, in reality, a place of great energy and excitement. Wesley Seminary has not only embraced but taken the lead in the 21st century of theological education. In order to continue to be the center of this vitality from its Spring Valley Campus, the Seminary must use its physical and financial resources to support and foster its educational mission. Most importantly, the Seminary must be able to attract the best and brightest faculty and students, many of whom come because the DC location is compelling, to maintain and elevate its place among the top thirty theological schools..

The reason for this development is not for Wesley to survive, rather, to allow us to thrive in place for the next generations. By some reckoning, the most prudent move for Wesley would be to sell this campus and relocate to a less expensive area in the mid-Atlantic region. But we are resolved to remain in Washington because we believe this city is central to our mission and our ability to attract both students and faculty. Wesley greatly values being a part of an

academic community committed to liberal higher education with all the vibrancy that it entails. Wesley and A.U. have always had some shared programming and there has been some new joint ventures.

We must also be able to thrive in place financially. The size of the new student housing building provides for the number and various types of beds and room configurations necessary to house Wesley students, faculty and staff (and their immediate families) and to achieve the financial benefit which is critical to our ability to remain in this neighborhood and be one of the leading seminaries in perpetuity. Wesley is currently one of only 30 seminaries competing nationally and internationally for the best students and faculty. But we are 20th in size of endowment. In a period of winnowing of the number of seminaries nationwide, this project would effectively move us to 10th. The high-end design of this dorm provides our students access to amenities they do not have now and enhances Wesley's appeal to younger students. In addition to replacing the 90-100 student housing beds lost in Carroll Hall and Straughn Hall, the New Dorm will provide flexible living options that will accommodate Wesley students requiring family housing or other living arrangements that are not available in the traditional single or double occupancy rooms in the existing 2014 Dorm.

We will devote most of the financial benefit to further subsidize student scholarships, including on-campus housing, which is expected to show increased demand from Seminary students. The fundamental economics of our business are extremely difficult as we strive to ordain ministers who have a graduate-level education similar in length, depth and cost to medical students, but they will earn a fraction of the salary over a lifetime. And so, our ability to discount the cost of this education is determinative of our ability to compete and thrive.

Beyond that, Wesley is a national leader in research and innovation. Our growth edge is in non-degree and certificate education and other programs to support the church nationally and internationally. This growth does not have an impact on our home campus. But we must be able to thrive in place to have a home base of faculty and students in the more traditional mode of education with all Washington has to offer. This includes our hybrid weeklong intensive programs, which bring students from across the world to campus for immersive learning experiences, as well as our expanding summer offerings designed to meet the evolving needs of ministry. We are also seeing a rise in in-person international student enrollment, enriching our community with global insight. While these efforts extend beyond the traditional model, they reinforce the need for a thriving home campus—where faculty and students are rooted in the heart of Washington, D.C., and where Wesley continues to grow in mission and impact.



A statue of Moses striking the rock adorns the courtyard outside the library.

I. THE SEMINARY AND THE DISTRICT OF COLUMBIA

A. Overview, Mission and History

Situated on nine acres in Northwest Washington, D.C., positioned between American University and the Spring Valley neighborhood (Site Location, Z.C. Exhibit 3A), the Wesley Theological Seminary of The United Methodist Church (“Wesley Seminary”) is a graduate theological school. The mission of Wesley Theological Seminary is to equip Christians for leadership in the church and the world, to advance theological scholarship, and to provide a prophetic voice in the public square. To pursue that mission, the primary focus is the preparation of exceptional leaders for churches, and human service non-profit leaders. Its rolling Campus offers an academic oasis enhanced by the excitement and cultural diversity of the city.

Wesley Seminary was founded in 1882 as a small seminary at Western Maryland College. Wesley Seminary moved from its Westminster, Maryland location to its current Campus in 1958. The institution flowered in size and stature on the new Campus, and its location became the foundation of its identity and success. The original buildings that will remain have all been renovated and the new Residence Hall added in 2014. Over its first sixty-seven years, Wesley Seminary grew to fill out its Campus reflecting all the changing patterns of seminary enrollment and trends in theological education.



The statue of John Wesley - here in special attire - was a gift to the seminary on behalf of British Methodists.

B. Accreditation and Institutional Affiliations

Wesley Seminary is fully accredited by The Association of Theological Schools in the United States and Canada, the Commission on Higher Education of The Middle States Association of Colleges and Schools, The University Senate of The United Methodist Church (Board of Higher Education and Ministry), and the District of Columbia Educational Licensure Commission.

Wesley Seminary is one of the thirteen official seminaries of The United Methodist Church, an ubiquitous denomination with a church in nearly every zip code of the United States and nearly every nation. Degree programs are structured to ensure all denominational ordination and consecration requirements will be met, and ordination information and counseling is offered.

At the same time, Wesley Seminary is broadly ecumenical ranging from Unitarian to Pentecostal. Students from over 26 other denominational backgrounds make up 48% of the current student body. Wesley Seminary enjoys a special relationship with the Episcopal Diocese of Washington and the leadership of the African Methodist Episcopal denomination. Students from a variety of Baptist traditions make up one of the larger denominational groups at Wesley Seminary.

Wesley Seminary is a founding member of the Washington Theological Consortium. The Consortium offers Wesley Seminary students a rich array of opportunities through close relationships with other major theological schools in the Washington area. Within minimal guidelines, students have access to the curricular offerings of all these schools and may cross-register for degree credit while paying tuition to their home school.

Wesley Seminary shares a Methodist heritage with its neighbor, American University (A.U.). They are separate institutions, but share several academic programs and, until recently, also shared utilities. The United Methodist Bishop serves ex-officio on both Boards.

C. Programs

Wesley Seminary provides in-depth study and reflection on the texts and traditions of our faith through the scholarly work of our faculty and the research capability of our library, through our Masters and Doctoral-level degree programs, and through our non-degree programs designed to reach both clergy and laity. The primary focus of the Seminary is to prepare leaders for the church. Wesley Seminary students are formed for a kind of leadership which draws from the texts and traditions of the faith so they may lead the church in mission and ministry in the world.

The hub of our academic programs is the Master of Divinity (M.Div.), an 81-credit degree which is the normal academic requirement for candidates for ordained pastoral ministry for the Protestants, Roman Catholics, and Eastern Orthodox. This is a longer Masters degree because it is a professional degree, which means that a third of the program covers various aspects of the practice of ministry. Also, a candidate for the M.Div. need not have studied religion or theology in undergraduate school. This means that the seminary curriculum includes both lower-division, lecture hall style, introductory courses in Bible, Theology, Church History, and Ethics and upper-division, seminar style, reading courses. These layers in M.Div. education create special requirements for the design of classroom space.

Wesley Seminary offers two other Master's degrees and a doctoral program. The Master of Theological Studies (M.T.S.) 60 credit and the Master of Arts (M.A.) 36-credit degrees. The M.T.S. is taken by students who may be pursuing professional ministry positions not requiring ordination, as a prelude to Ph.D. work, or simply for personal enrichment. The M.A. is for persons working in specialized ministry fields outside of pastoral ministry. The Doctor of Ministry (D.Min.) 30 credit degree is an in-service, advanced degree for pastors and other church leaders seeking a deeper learning and new skills for ministry.

Night classes, hybrid schedules and online learning, and partnering opportunities are designed to accommodate both full-time and part-time students. The Master's degrees are taken on a semester system with the fall semester running late August through mid-December and a spring semester running mid-January through early May and a May-July set of summer school courses. The Doctor of Ministry degree is taken in two-week intensive sessions in early January and May when the full-time students are not on campus.

Wesley Seminary also offers significant non-degree programs which are expanding. The largest is the Course of Study School. Some of these students are on campus late-June through July, is for those who are serving as bi-vocational part-time pastors of rural churches.

D. Research

The Wesley Seminary library participates in the American Theological Library Association and the Washington Theological Consortium, which allows us to focus our collection of about 135,000 volumes on theological works and a few other special holdings.

Over time, Wesley Seminary has established three centers of specialized work and research to serve both our students and the broader church and society. To be “centered in the seminary” means that it is a resource to all existing degree programs of the seminary. To be “a Center for” means that the Center would help Wesley Seminary fulfill its vision to be a church-based seminary by providing resources beyond the degree programs.

The Henry Luce III Center for Arts and Religion was a first among seminaries to seriously introduce the language and sensibilities of the arts in a theological school. The Center’s on-campus facilities include a fine arts studio with an open-door policy for the Seminary community and the Dadian Gallery, which is open to the public throughout the year. The Center sponsors residencies for artists in a wide array of mediums, dialogues between artists and theologians, and regularly scheduled exhibits in the Dadian Gallery.

The G. Douglass Lewis Center for Church Leadership was formally established in July 2003 to be a Center for the church, centered in the seminary. This is the largest of our centers

with a staff of seven, offering workshops, seminars, podcasts, consulting, and an online constituency of 20,000.

The newest entity is the Community Engagement Institute, which helps students, pastors, and congregations engage effectively in the public square, including a leading program in public theology. The programs in the Institute engage students with the unique political, civic and media leaders available in Washington.

Wesley Seminary also specializes in research and programs in congregational vitality. We run more grant-funded research programs than any other seminary, many funded by the Lilly Endowment. One current program bears directly on the future design of seminaries, a quantitative and qualitative study of the “Changing Nature of the Religious Workforce.”

Many seminaries offer some of the kinds of programs listed above. Very few offer this full range and depth of theological education. All of these programs can be explored in more detail on our website: www.wesleyseminary.edu.

E. The Wesley Seminary Community

Preparing an individual for ministry is a formation of the whole person, involving intellectual, emotional and spiritual discipline, and the practical skills and insights necessary for effective leadership. We believe that forming people for ministerial leadership requires a community that embraces both our diversity of culture and our unity in Jesus Christ. Part of the requirement in the Master’s program is an “immersion” experience so that students spend a period of time in a culture not their own.

Central to our community is our worship in Oxnam Chapel. Services are at Noon on Tuesday in the chapel. There are other smaller prayer and worship meetings around the campus throughout the week. In addition, students participate in small groups for study and meditation. Space for worship and small group interaction is a critical component in our campus design.

1. Enrollment

The Chart below shows the trends in Wesley's enrollment over a fourteen-year period broken down by degree program. Fiscal Year 2008 witnessed the peak in overall student enrollment after almost a decade of steady growth. After Fiscal Year 2008, there has been a significant decrease in the number of students, but an increase in the number of course hours taken by each student. The total number of students has fallen to the levels in 2000-2001 because of the decline of the traditional Master of Divinity degree. Yet, the Doctor of Ministry degree has shown a substantial increase and the Master of Arts has remained strong, reflecting the changing market for seminary education. Over time the student population will continue to fluctuate upwards and downwards, but the scale of the community will remain self-contained and intimate. Wesley Seminary does not plan to expand beyond the population levels established by its current Campus Plan although the 2016 Zoning Regulations require a different methodology for determining enrollment without distinction between full or part-time students. As a result of the headcount approach, Wesley has revised its student enrollment cap to 1,000 to reflect both full-time and a substantial number of part-time students who only visit campus for brief sessions on weekends or during the summer.

Wesley Theological Seminary – 2011 to 2025 Enrollment History

| Masters | | | | Post-Degree | Totals | Non-Degree | Non-Degree | Employees | |
|-------------|----|-----|-----|---------------|--------|--------------|-------------------------|------------------------|-----------------|
| Term | MA | MTS | MDV | Total Masters | D. Min | Total Degree | Weekend Course of Study | Summer Course of Study | Total Employees |
| Fall 2011 | 23 | 74 | 316 | 413 | 180 | 593 | 41 | 157 | 87 |
| Fall 2012 | 49 | 51 | 315 | 415 | 170 | 585 | 76 | 149 | 85 |
| Fall 2013 | 56 | 47 | 322 | 425 | 162 | 587 | 85 | 124 | 70 |
| Fall 2014 | 57 | 53 | 297 | 407 | 130 | 537 | 83 | 129 | 78 |
| Fall 2015 | 48 | 60 | 283 | 391 | 140 | 531 | 116 | 95 | 75 |
| Fall 2016 | 39 | 56 | 261 | 356 | 155 | 511 | 152 | 98 | 73 |
| Fall 2017 | 52 | 44 | 248 | 344 | 185 | 529 | 107 | 81 | 72 |
| Fall 2018 | 48 | 38 | 250 | 336 | 155 | 491 | 139 | 79 | 88 |
| Fall 2019 | 46 | 30 | 219 | 295 | 166 | 461 | 158 | 77 | 81 |
| Fall 2020 | 49 | 39 | 212 | 300 | 165 | 465 | 201 | 0 | 76 |
| Fall 2021 | 47 | 31 | 180 | 258 | 172 | 430 | 198 | 110 | 83 |
| Fall 2022 | 51 | 29 | 152 | 267 | 185 | 452 | 199 | 101 | 88 |
| Fall 2023 | 50 | 24 | 149 | 249 | 186 | 435 | 160 | 192 | 82 |
| Fall 2024 | 54 | 24 | 156 | 265 | 189 | 454 | 214 | 158 | 74 |
| Spring 2025 | 57 | 20 | 144 | 250 | 223 | 473 | 184 | N/A | 71 |

The diversity of the student body is both demographic and programmatic.

Demographically, the enrollment trends at Wesley Seminary are in the same direction as the rest of Mainline Protestant. For example, 62% of our Master’s candidates are women. Our student body is majority minority with 34% of our students are African-American, 15% Asian, and 5% Hispanic, giving Wesley, an historically “white” institution, one of the highest number of black seminarians in the country. There is also a wide range of ages. Underneath these statistics is the diversity of background and life experiences these percentages represent. This is both a

wonderful resource and a great challenge to the task of education and formation. The trends also show an increased diversity of program.

Wesley Seminary's community also includes a number of people involved in non-degree programs. The largest of these is the summer Course of Study, which enrolls approximately 200 students some of whom come for brief programs on weekends (Friday night and Saturday) and summer sessions while others participate virtually or at off-campus locations. We are also standing up a number of non-degree programs ending in a "Certificate" in church-based health ministries and various forms of lay education.

The hidden dynamic in Wesley Seminary's enrollment is the prevalence of the part-time students and the diversity of vocational directions. Wesley, like all seminaries, was designed and acculturated to the young, full-time resident student focused on a lifetime of pastoral ministry. There is a strong feeling within theological education that this monastery-like community is the ideal way to form people for ministry. But Wesley Seminary made a series of decisions over the years to accommodate people at different places in their lives with differing senses of their future ministry. As a result, we expanded the range of programs and the flexibility of schedule.

All this diversity means that Wesley Seminary is a community of communities. One of our greatest challenges is to foster a community that forms all these people for ministry. This is a guiding consideration in the creation of this Campus Master Plan: we are still small enough to be self-contained with the elements of the cloistered life essential to ministerial formation.

2. Faculty

Wesley Seminary's faculty are some of the most well-known and widely published in theological education. All 15 full-time faculty have earned doctoral degrees from accredited institutions of higher learning. Diverse points of view are recognized as a virtue to be appreciated, not an obstacle to be overcome. Their work has been described as "deep center," taking the scriptures seriously, attuned to the challenges of the modern world and committed to a ministry of love and reconciliation, but large enough to offer a broad educational and theological experience to meet the needs of a diverse student body.

Wesley Seminary faculty members are nationally recognized as leaders in each of the theological school disciplines: Bible, theology, ethics, church history, pastoral care, preaching and worship, Christian education, sociology, and anthropology of religion. In addition to being distinguished scholars and teachers, the faculty are some of the most sought-after consultants, teachers, and preachers in the Church. Providing adequate space for the faculty itself to be formed as a community of scholars is an important part of this Campus Master Plan.



One third of the entering class of students is in their twenties.

3. Governance and Management

Wesley Seminary is governed by a 40-member Board of Governors that includes outstanding civic and business leaders whose dedication continues to challenge and guide the Seminary to new heights. Current and former Board members include pastors of significant churches, a retired Marine Corps four-star general, a former D.C. City Administrator, a major real estate developer and a university president, two bio-tech scientists, three Bishops, and other prominent clergy and laypeople. A list of current Governors is included in Z.C. Exhibit 3A.

Board members keep the Seminary faithful to its mission. They develop the Seminary's broad policy framework, and they hire and oversee the administration that implements those policies. The Board and its committees meet three times per year, guided by an Executive Committee.

Wesley Seminary's administration is led by a talented and diverse executive team. Wesley's President, The Reverend Dr. David McAllister-Wilson, has so far served twenty-three

year in office, having previously spent twenty years in other positions at Wesley Seminary. He is now the longest serving president among the seminaries of North America. The Reverend Dr. Carla Works, Professor of New Testament since 2009, is now Dean, leading the faculty and guiding the academic programs. The Reverend Dr. Kyunglim Shin-Lee, Vice President for International Relations, is a leader in the Korean community both in the United States, Korea and the Korean diaspora. The Reverend Dr. Beth Ludlum, Vice President for Strategic Initiatives, has been instrumental in bringing many new partnerships to Wesley. She manages multiple research grants. The Reverend Benjamin Hall, Vice President of Admissions & Financial Aid, works directly with students interested in enrolling at Wesley and current students who may need financial aid. Registrar Joe Arnold has a theological degree and works with the Dean and faculty to maintain the academic programs. The Reverend Dr. Antoni Sinkfield is a leader in the African American community and serves as Associate Dean of Community Life and Campus Operations.

4. The Financial Picture

As a free-standing school, Wesley Seminary is dependent upon self-generated tuition, gifts and endowment income. The Seminary has seen a decline in Masters student hours and an increasing need for scholarship support of students. This is a trend across seminary education and has put financial pressure on the Seminary. A full 61 percent of Wesley's \$15 million annual operating budget is devoted directly to the quality of our academic program and our students. An additional 7% is grant-funded research. The Seminary relies on enrollment and tuition for 43% percent of its net revenue. A sign of Wesley Seminary's prestige is the large number of foundations that make grants to the Seminary. We have maintained our physical facilities. Other than the buildings which are to be razed, there is no deferred maintenance on

buildings and utilities. The principal challenge is the 1960-era student housing, Straughn Hall and Carroll Hall, which are old and obsolete. Straughn Hall has recently been mothballed due to its deteriorated condition. These antiquated dormitories put the school at a substantial competitive disadvantage to other seminaries and the dorms are projected to be demolished in the context of this plan.

F. Wesley's Ministry in the Neighborhood, Washington and the World

Wesley Seminary is known nationally and internationally as a leading theological school, but we are one of the best kept secrets in Washington and an untapped resource in Ward 3.



New members of the Board of Governors are installed during a chapel service.

Wesley is a multiplier institution. Graduates serve in all 50 states and in 30 countries around the world. It is estimated that each graduating class significantly touches the lives of

500,000 people. Alumni are scattered to all parts of the earth as leaders of the church and other service organizations.

It is in the Washington area that Wesley Seminary has its greatest impact. The majority of our students come from the mid-Atlantic region. In this current semester, 37 Masters degree students are from the District of Columbia, 111 from Maryland, and 72 are from Virginia. As our graduates move into ministry, the predominant number serve this region. They serve not only as pastors, but also appear in leadership roles across a broad spectrum of the non-profit community. While still in seminary, our students serve as interns in churches and agencies throughout the District. Spring Valley and other local employers covet Wesley Seminary students for their friendliness and reliability.

Through our students, graduates, and Board members, Wesley Seminary has significant ties to key congregations in Washington, including National Metropolitan Memorial, Asbury and Foundry United Methodist Churches, Washington National Cathedral, National Presbyterian Church, Shiloh Baptist and Metropolitan Baptist, Ebenezer African Methodist Episcopal, Metropolitan African Methodist Episcopal Church, St. John's Episcopal, and many others. Wesley Seminary serves these and many other congregations through our outreach programs, especially the work of our Center for Arts and Religion, the Center for Church Leadership, and the Community Engagement Institute, all engaging in significant consultations and collaborations with area congregations. Our National Capital Experience Semester Program brings seminary students from around the country to visit and intern in a variety of governmental and non-profit organizations in Washington. Our faculty consults with the National Institute of Health, members of Congress, the Chiefs of military Chaplains, and the Executive branch on a regular basis.

Since 9/11, Wesley determined to better serve the governmental institutions in our city. Most particularly, the military and intelligence communities. Wesley was one of the few seminaries participating in the Yellow Ribbon program. And we established a Doctor of Ministry degree focus for military chaplains. Over 200 have graduated and about the same number are currently in the program under full scholarship. The chaplains are able to be at Wesley in intensive study. Most recently, we have offered 50% scholarships to federal civil servants and contractors who have recently been discharged.

And we are a good neighbor. Wesley Seminary is a wonderful resource for Washington residents and especially our neighbors in Ward 3. Wesley Seminary is an open campus, and we welcome neighbors to stroll our grounds and partake of the contemplative spirit of our community. Our chapel services and library are open to the public during the regular semester. It is also easy for neighbors to audit courses and obtain library privileges. And, we have the best sledding hill in the neighborhood as shown below.



In September 2021, Wesley sponsored the first Neighborhood Family Movie Night on the sledding hill. Wesley and neighborhood families enjoyed an evening presentation of Disney’s “Moana.” We have held the Movie Night every year since then. Every dog owner in Spring

Valley finds a welcome parkland. Most recently, the Seminary began hosting the annual on-campus “Spring in the Valley” Family Day event on May 13, 2023 featuring music, inflatables, face painting, and food trucks.

Of special note is the Dadian Art Gallery, which is open to the public and features first-class, intimate shows on a continuous basis throughout the year. Often, Wesley Seminary brings to campus noted preachers and lecturers. The public is invited, usually free of charge.

II. SHAPING THE WESLEY SEMINARY CAMPUS OF THE FUTURE

The Thrive in Place Campus Plan (2025-2035) was driven by Wesley Seminary’s Strategic Vision of “Ministry 2044,” and the related Goals, Strategies and Planning Principles. Taking the long-term view for the next generation, Wesley Seminary adopted “Ministry 2044” as its guiding force for the future. This plan encompassed three ambitious goals, all of which were achieved:

1. To Prepare Exemplary Teachers, Preachers and Leaders;
2. To Make Effective Use of Wesley Seminary’s Location in Washington, D.C.; and
3. To Become a Truly Global Seminary.

Five Considerations went into the vision for the Wesley Seminary Campus:

- Exemplary Learning Environment;
- Quality of Student Life;

- State-of-the-Art Research;
- 21st Century Worship; and
- Full Access.



Students enjoy the beauty and tranquility of Wesley's campus.



The Library was renovated and reopened in September 2011.

In the 2021 Academic year, Wesley successfully underwent re-accreditation from both the Association of Theological Schools and the Middle States Commission on Higher Education. We used that period of self-study to frame up a new and more dynamic strategic planning process. It is driven by a set of questions:

1. Given the changing landscape of church-based ministry, how can Wesley proactively adapt to and address the emerging future needs of faith leaders and faith communities?
2. How do we sustain and develop degree and non-degree programs of excellence to reach and meet the educational and vocational needs of a diversity of students?
3. How can we stay competitive and economically viable as old patterns of support for seminaries are weakening and an increasing number of students enter less than full-time ministry?
4. How do we make effective use of our location in Washington, DC to prepare the next generation of church and community leaders?
5. How can we strengthen our institutional and academic assessment mechanisms to inform decision-making on key priorities?

And guided by a set of strategic assumptions:

1. Remain a church-based seminary and explore other markets for theological education.
2. Continue to compete nationally and internationally and enhance our presence in the mid-Atlantic region.
3. Maintain a high-quality, traditional, residential program and develop and strengthen non-traditional degree and non-degree programs.
4. Emphasize the unique programs lodged in our centers because they attract students we wouldn't get otherwise.
5. Maintain the demographic and theological diversity of our seminary community.
6. Stabilize our net tuition revenue.

In line with this new planning process, Wesley received a \$1 million grant from the Lilly Endowment to study the future of the religious workforce. This turned out to be the prelude to a major grant program, “Pathways to Ministry.” Wesley received 2 major grants, totaling \$6 million, to develop innovative educational programs. And with them, the development of a sustainable business plan and proofs of concept for an expanded role for seminaries to prepare a variety of pastoral leaders for the many evolving forms of the future church. Ministry grant program.

Spring Valley Campus 2025

The current Campus is comprised of Lots 6 (A&T Lots 818 and 819), 7, 8 and 9 in Square 1600 with a total area of 381,787 square feet (8.77 acres). The Campus is improved with eight (8) buildings, including three student residence buildings (Straughn Hall, Carroll Hall and the 2014 Dorm); the Library; Kresge Academic Hall; Trott Hall and Chapel; a small one-story maintenance building; and the Old President’s House on University Avenue. The total gross floor area of the Campus is approximately 166,916 square feet. All of the existing buildings were part of the original Campus, except the new residence hall, which was completed and occupied in 2014. The Campus has a total of 174 surface parking spaces, including 143 in the parking lot in the center of the Campus and an additional 31 spaces located along the interior roadways. Vehicular ingress and egress is provided to and from the existing Massachusetts Avenue driveway. Vehicles leaving the Campus can only turn right onto Massachusetts Avenue. The University Avenue driveway is currently exit only as right turn only with no left turn or straight movement permitted. A limited number of delivery and service vehicles are allowed to enter the Campus from University Avenue.

III. CAMPUS PLAN TO THRIVE IN PLACE (2025-2035)

This Plan represents the last foreseeable new development on the Campus and maintains the established hilltop campus building configuration surrounded by the prominent Green Open Space that defines the Wesley Seminary relationship with the neighborhood. Two 1960-era obsolete dorms, the surface parking lot and adjacent maintenance building, and the Old President's House will be demolished. This will allow the construction of a new student housing building. (Site Zoning Plan, Exhibit E).

A. Demolish Old President's House and Restore Site with Landscaping

The Old President's House is located on the three lots on University Avenue. (Existing Land Use, Exhibit L). This two-story, 4,538 square-foot building is no longer habitable and has not been used for its intended purpose for twenty years. The building and associated paved parking area and University Avenue curb cut will be demolished. This area will be re-landscaped, including a small community playground to maintain and enhance the existing Green Open Space along University Avenue. (Landscape Plan, Exhibit H, Exhibit 3).

B. Demolish Carroll and Straughn Halls and Surface Parking Lot

The two 1960 – era original dorms, Carroll Hall (27,533 square feet) and Straughn Hall (29,866 square feet), that surround the existing surface parking will be demolished. (Existing Land Use, Exhibit L). Together, these two-story buildings provide ninety beds. Carroll Hall is significant to the Seminary's housing inventory because it provides family-style units for married students and their families. Replacement of this critical family housing will be facilitated by the proposed New Dormitory.



Carroll Hall Family Apartments, above; Straughn Hall, below.



At the center of the Campus, the surface parking lot with 143 spaces and adjacent one-story maintenance building will also be demolished. (Exhibit L).

C. New Student Housing for Wesley and American University

The new student housing is exclusively for Wesley and A.U. students needing local housing and will be located in the area of the existing surface parking lot. (Exhibit E). The building will be seven stories with an approximate height of 74 feet, 8 inches, and nestled between the existing Seminary buildings and the immediately adjacent and taller A.U. buildings. (Revised Architectural Plans, Elevations, Sections, Exhibit 2). The originally proposed habitable penthouse top level (17,183 square feet) has been eliminated from the plan. This purpose-built

student housing will be approximately 282,061 square feet and have approximately 215 living units configured in studio, one, two, three, four and five bedroom units with a total of approximately 659 student beds. Each unit will provide common living space including kitchens for the student residents. 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, the top/penthouse level has most recently been eliminated reducing the building gfa by 17,183 square feet, and 99 spaces have been eliminated from the underground parking garage. (Architectural Plans, Elevations, Exhibit 1; Street View Renderings, Exhibit 2). The building will have two levels of underground parking with between 264 parking spaces and internal loading and trash facilities. Approximately 105 of the parking spaces are replacement spaces for Wesley's exclusive use. Additionally, the Seminary's maintenance facilities and storage will be located in the underground parking garage.

The new building will be first-class student housing with amenities, including purpose-designed study areas with group and individual spaces, a computer lounge, activity club room, and an outdoor interior courtyard. The New Dormitory will include an access security system and security cameras will be installed throughout the Campus. (Campus Security Plan, Exhibit 5). The design will focus on sustainability and is designed to achieve the equivalent of LEED Mid-Rise Residential Gold certification.

The new student housing will be developed through a long-term (99 year) ground lease for a portion of the Campus (Lot 819) between Wesley Seminary and Landmark Properties. Wesley Seminary will receive a lump sum initial payment and annual guaranteed ground rent payments.

Landmark will be responsible for the construction and operation of the new building. Use of the ground lease property is strictly and perpetually limited to first-class student housing and subject to approval of this Campus Plan by the Zoning Commission. At the conclusion of the ground lease, ownership of the building will revert to Wesley Seminary. For colleges and universities nationwide, it is now common practice to rely on private companies to provide customary campus services, including housing, food service, bookstores, and personal and convenience services.

1. Landmark Properties

Landmark Properties is a leading nationwide purpose-built student housing provider. It currently owns and manages 60,000 student housing beds in twenty-five states with an occupancy rate of 95%. Landmark will be responsible for the construction and operation of the new student housing. This building will be staffed by a full-time on-site management team, which typically includes a Community Manager, Resident Services Manager, Leasing and Marketing Manager, Maintenance Supervisor and Technician(s), Grounds Keeper, and Community Assistants/Ambassadors (1 per 100 beds).

The new student housing will be limited exclusively to Wesley Seminary and America University students in good-standing, faculty and staff and families of both schools. All residents will be subject to Landmark Rules and Regulations developed in careful consultation with Wesley Seminary, including restrictions on noise, unruly behavior, large gatherings, drug and alcohol use, and off-campus parking in the surrounding neighborhood. Wesley students will also be subject to the Seminary's Student Covenant. (Landmark and Wesley Codes of Conduct, Exhibit 6). A.U. students will also be subject to the University's Code of Conduct which is equally enforceable on and off-campus under its "Good Neighbor Guidelines" and Office of

Campus Life. ZC Order No. 20-31 (2022). Similarly, AU's "Good Neighbor Parking Policy" will be applicable to its students living in the New Dorm. Both institutions' Codes of Conduct are derived from their common identity as Methodist-related institutions. Landmark will utilize a broad-range of enforcement measures to ensure compliance with the applicable rules, including restrictions, parental guarantees, non-renewal and/or termination of housing agreement.

The American University students living in this community will be welcomed as members of the Seminary community to whatever degree they would like. This would include worship experiences and other Wesley community events, access to Wesley's Refectory, and library privileges. And, by virtue of their admission to A.U., they would be eligible to take courses at Wesley commensurate with their graduate or undergraduate level at Wesley tuition rates which are substantially lower than American University tuition rates. There is already a history of this kind of rich integration with the seminary community in the experience of A.U. students who have successfully lived in the current Straughn Hall. Wesley and A.U. already share in two joint degree programs: M.T.S. – M.A. in International Development and M.T.S. – M.A. in International Peace and Conflict Resolution. We believe these and the additional academic accommodations will be an attractive incentive for A.U. students wishing to live in this facility and bridge the two campuses.

2. No Agreement with American University

There is no agreement with A.U. and none is necessary or being pursued by Wesley Seminary or Landmark Properties for this project to be successful. However, this project involves a strengthening of the historic partnership between our two institutions. New joint programs are already underway or being explored. But with respect to this building and its

occupants, Wesley stands ready to discuss issues such as security cooperation, pedestrian, and traffic flow with A. U. when they are ready. Recently, Wesley met with AU's new President, Jonathan R. Alger, to introduce him to the proposed Campus Plan. As a result, Wesley and AU's senior staff continue to meet periodically to discuss the Campus Plan, process, and schedule. We have designed the building to orient toward the adjacent A.U. Campus. The issue of the existing fence between us has been raised in ANC 3D and community meetings. With the future cooperation of A. U. in consultation with the community, we would be happy to see the fence removed and/or a controlled pedestrian gate as a way to facilitate access back and forth.

A.U.'s recently approved Campus Plan addresses its need to meet their minimum on-campus housing requirements. Under the A.U. Campus Plan, the maximum student enrollment (headcount) is 14,380, including 8,207 full-time undergraduate and 2,997 full-time graduate students. A.U. will be required to provide on-campus housing (including 330 triples and 200 off-campus master leased beds) for 100% of its full-time freshman and sophomore students and 67% of all full-time undergraduates. A.U. currently has approximately 5,446 on-campus beds. The Campus Plan proposed the addition of 500 beds over the next ten years. An additional 200 on-campus beds are authorized if the 200 off-campus master leased beds are eliminated. A.U. will continue to provide no on-campus housing for its graduate students. It appears A.U. does not now, or as planned in the future have enough on-campus housing for all its undergraduates, and it provides no on-campus housing for its graduate students. Recognizing the substantial demand for off-campus housing for its students, A.U. provides a robust off-campus housing program on its website <https://www.american.edu/ocl/housing/off-campus-housing-services.cfm>. A large number of A.U. students without on-campus housing live in existing off-campus multi-family apartment buildings, including The Berkshire at 4201 Massachusetts Avenue, N.W. (759 units)

and the Avalon at Foxhall at 4100 Massachusetts Avenue, N.W. (308 units) and other residences in the neighborhood. Student pedestrian traffic to and from the nearby off-campus apartment housing on Massachusetts Avenue is well known to the neighborhood.

Both Wesley and Landmark are confident that the number of A.U. students who will be readily attracted to this first-class student housing immediately next door to A.U. will exceed the available beds. The student-oriented design and operation of the New Dormitory will meet student housing preferences, including:

- Location immediately adjacent to campus.
- Professional on-site management.
- Secure building with 24/7 electronic monitoring.
- Up to 4- and 5-bedroom units offering different rental price points.
- Individual housing contracts.
- Fully Furnished Units.
- Cost competitive with local off-campus housing.
- Housing costs unbundled from student food service plans.
- Student oriented amenities such as private and group study rooms, free printing, desktop computers, a clubroom with lounge seating, and outdoor common areas.
- Community events.
- Roommate matching services.
- Spacious and open-concept floorplans.
- LEED Gold building design with modern finishes.

For the neighborhood, this will accomplish their long-standing desire for students to live within the precincts of a campus and will make scarce local housing available to non-students.

The housing of A.U. students on Campus will support and enhance the University's off-campus housing program and provide additional first-class housing options for its students in the immediate neighborhood.

D. Elimination of Proposed Wesley Administration and Maintenance Building

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.

E. No Development of University Avenue Residential Lots

The three residential lots on University Avenue (Lots 7, 8 and 9) were re-incorporated in the Spring Valley Campus in 2012 in Zoning Commission Case Number 05-40A. (Existing and Proposed Property Boundary, Exhibit J). After the demolition of the Old President's House, there is no plan to develop these lots for Campus use, except for the proposed neighborhood playground and landscaping. The three lots will remain part of the Green Open Space along University Avenue.

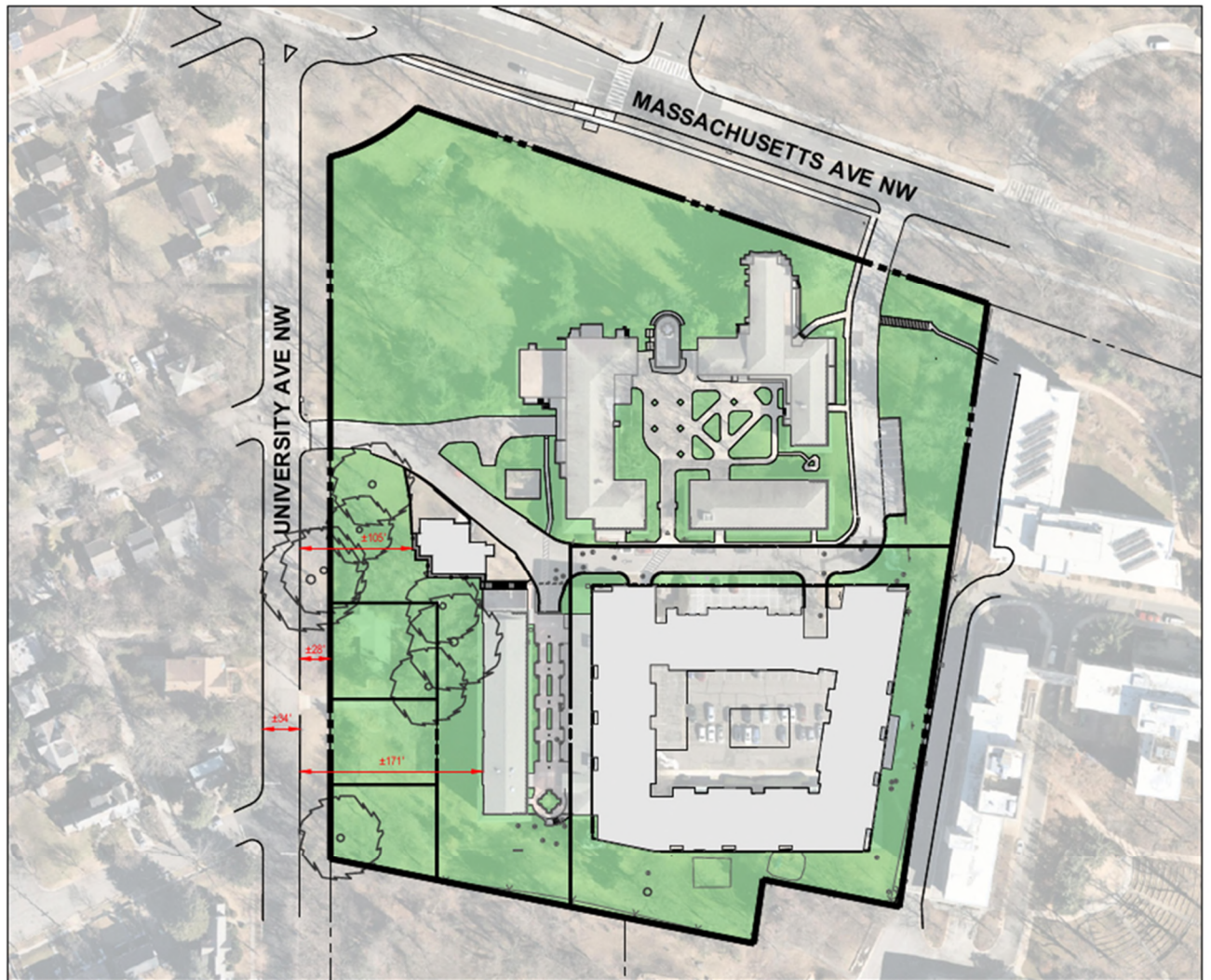
F. Maintain "Hilltop" Campus

Under this Plan, the established building perimeter formed by the New Residence Hall, Kresge Hall, Trott Hall, Chapel, Library and A.U. Campus is maintained. (Existing Land Use,

Exhibit L). The Hilltop Campus is surrounded by and isolated from the adjoining neighborhood by the substantial Green Open Space on Massachusetts Avenue and University Avenue.

G. Maintain and Enhance Green Open Space Buffer Zone on University Avenue and Massachusetts Avenue

The Green Open Area that defines the Spring Valley Campus will be maintained and enhanced. (Existing Open Space, Exhibit O; Proposed Open Space, Exhibit P). No development is proposed for the Green Open Space which is notable for its abundant Heritage (27) and Special (76) Trees and landscaping that was previously enhanced under the 2012 Campus Plan. Under this Plan, even more landscaping will be added at the former Old President's House site, along University Avenue, at the University Avenue driveway and site of the proposed Administration and Maintenance Building and at the Massachusetts Avenue entrance. (Landscape Plan, Exhibit 3, Aerial Views, Exhibit 4). The existing Green Open Space and enhancements will create a more substantial and durable buffer to the neighborhood, especially on University Avenue. From the New Residence Hall to the east curb of University Avenue it is 171 feet, and to the west curb of University Avenue 205 feet. From the New Dormitory, it is 300 feet (a football field length) to the east curb of University Avenue. From the New Dormitory across Massachusetts Avenue and the AU property, it is approximately 660 feet (more than two football fields) to be nearest residential properties in the 4400 block of Sedgwick Street, N.W. Fully fifty-three (53) percent of the Spring Valley Campus area (205,000 square feet) will remain undeveloped and devoted to Green Open Space. In addition to the Green Open Space, there will be an additional 37,000 square feet of formally landscaped area on the campus

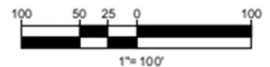


ULTIMATE OPEN SPACE EXHIBIT

04/05/2021 | TEF | DC1821572 | Rev 0

WESLEY THEOLOGICAL SEMINARY

4500 MASSACHUSETTS AVE NW, WASHINGTON, DC 20016



H. 300,740 Square Feet of Unused Gross Floor Area

By maintaining the substantial Green Open Space and limiting the size and location of new development, Wesley Seminary has not utilized a substantial level of the permitted 1.8 FAR for the Campus. As proposed, total development is limited to about 387,040 square feet or 1.014 FAR. As a result, more than 300,740 square feet of development potential will remain unused.

| Wesley Campus Area | |
|--|------------------------------|
| Lot 6 A&T Lot 818 (WTS) – 243,124 sq. ft. A&T Lot 819 (Landmark) – 113,758 sq. ft. | 356,882 sq. ft. |
| Lot 7 | 9,000 sq. ft. |
| Lot 8 | 8,000 sq. ft. |
| Lot 9 | 7,996 sq. ft. |
| Total Campus Land Area | 381,878 sq. ft. (8.78 acres) |
| Total GFA @ 1.08 FAR | 412,428 sq. ft. |
| Total GFA @ 1.8 FAR (Campus) | 687,780 sq. ft. |

| Current / Proposed Development GFA | | |
|------------------------------------|------------------------|-----------------------------------|
| Building | Current | Proposed |
| Straughn Hall | 29,866 sq. ft. | 0 sq. ft. |
| Carroll Hall | 27,533 sq. ft. | 0 sq. ft. |
| Old President House | 4,538 sq. ft. | 0 sq. ft. |
| Library | 16,630 sq. ft. | 16,630 sq. ft. |
| Trott Hall / Chapel | 26,335 sq. ft. | 26,355 sq. ft. |
| Kresge | 32,819 sq. ft. | 32,819 sq. ft. |
| 2014 Dorm | 29,195 sq. ft. | 29,195 sq. ft. |
| New Admin Building | 0 sq. ft. | 0 sq. ft. |
| New Dormitory | 0 sq. ft. | 282,061 sq. ft. |
| Total | 166,916 sq. ft. | 387,040 sq. ft. (1.07 FAR) |
| Unused Campus GFA | -- | 300,740 sq. ft. |

I. Community Playground

The Spring Valley neighborhood has requested that the Seminary build and maintain a small neighborhood playground on the Wesley Campus as a community amenity. In addition to its much enjoyed “Sledding Hill”, Wesley Seminary would be pleased to provide space and finance this new neighborhood serving project. The proposed neighborhood playground would be setback back approximately forty feet from University Avenue in the area of the three residential lots. The playground will measure approximately 40 feet by 95 feet and have an area of approximately 3,800 square feet with a natural double shredded hardwood mulch safety surface surrounded by a 48 inch tall vinyl-coated chain link perimeter fence. It will include

benches and play equipment suitable for toddlers and young children. The playground will have a public point of entry adjacent to University Avenue, N.W. by means of an accessible sidewalk. It will be fenced and open to the public only during daylight hours. The final design of the playground will be substantially in accordance with Exhibits 3 and 4.

IV. COMMUNITY OUTREACH AND PARTICIPATION

For Wesley Seminary, 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, Advisory Neighborhood Commissions 3D and 3E, other established neighborhood organizations, including the Spring Valley Neighborhood Association, Spring Valley-Wesley Heights Citizens Association, and other interested parties and individuals. This process has been candid and productive at every stage of Wesley Seminary's evolving Campus Plans.

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 pandemic, these meetings were fully renewed in 2021 and have gained momentum. Wesley Seminary has participated in more than forty-five (45) community meetings, as listed below in Section VIII, page 107.

This community engagement has been open, detailed and productive and resulted in substantial changes in the original plan and the proposed set of Conditions set forth below in Section X. Although issues remain for ongoing discussion, the firm basis for more detailed

cooperation and problem solving has been established for successful and timely approval of this 2025 Plan.

In addition to its work with its neighbors, Wesley Seminary has been actively engaged with the relevant District agencies and officials, including the Office of Planning, District Department of Transportation, the Zoning Administrator, and others.

V. THE WESLEY SEMINARY CAMPUS: EXISTING AND PROPOSED

Based on a thorough assessment of the Seminary's mission, goals, programs, and facilities, this Thrive in Place Campus Plan for the Years 2025 through 2035 represents the projected needs of the Wesley Seminary Campus within a framework that allows for flexibility in its specific implementation over the next ten years.

The Campus Plan proposes that the Seminary fulfill its academic mission through demolition of its two 1960-era dormitories (Straughn Hall and Carroll Hall) and the Old President's House, construction of a new Dormitory, playground and enhancement of the existing Green Open Space that surrounds and buffers the campus building envelope from the adjoining neighborhood. The boundaries of the proposed Campus Plan will be maintained to all the property owned by the Wesley Seminary.

This proposed campus development will enable Wesley to remain in Spring Valley and improve its buildings and grounds and utilize its valuable resources to continue and enhance the academic programming that defines Wesley Seminary's distinctive and leadership place in theological education.

A. Location, Boundaries, and Zoning

Wesley Seminary's amended Campus Plan boundaries encompass almost nine acres (381,878 square feet on Lots 6 (818 and 819), 7, 8 and 9 in Square 1600) (See Existing and Proposed Property Boundary, Exhibit J), generally extending from University Avenue on the north to Massachusetts Avenue on the east and A.U. on the south and west. (See Site Location, Z.C. Exhibit 3A). The campus is situated in the Spring Valley Neighborhood, a predominantly residential section of Ward 3 of Washington, D.C. This section of the city is also home to institutional activity, including A.U., the headquarters of the Department of Homeland Security at Ward Circle, and diplomatic residences and neighborhood commercial areas.

The property within the Campus Plan boundaries is located within RA-1 Zone District (low to moderate density residential). (See Existing Zoning, Exhibit K). No change in the existing Campus Plan boundaries is proposed.

When the proposed development is actually constructed, building area will increase to 387,740 gross square feet within the Campus Plan boundaries. This translates to an aggregated FAR of approximately 1.014 within the RA-1 District, well within the permitted campus ceiling of 1.8 FAR. Development proposed in the RA-1 District will conform to the applicable height, setback and lot occupancy limitations consistent with that zoning classification and the maximum permitted FAR.

B. Property Ownership

The Seminary will continue to own 100% of the land within the proposed Wesley Seminary Campus boundary, all of which is zoned RA-1. (See Existing and Proposed Property Boundary, Exhibit J).

C. Land Use

For planning purposes, building uses on campus are categorized in five (5) major groups based on the predominant existing uses on campus, as follows:

- **Residential (R)** – Housing for students and other tenants both temporary and longer term. Includes recreation facilities, student activity facilities and auxiliary services.
- **Academic/Administrative (AA)** – Classrooms, library, faculty offices, administrative offices, auxiliary services and limited support functions.
- **Chapel (C)** – Assembly and/or chapel facilities.
- **Support (S)** – Parking, auxiliary services and limited support functions.
- **Open Space (O)** – Informal (perimeter landscape) and formal (courtyard/special landscaping) open space.

(See Existing Land Use, Exhibit L).

Generally, all Wesley Seminary's major facilities, including the Kresge Academic Building, the Trott Administration Building and Chapel, the Library, and the two dormitories (Carroll Hall and Straughn Hall) are concentrated in the central core of the Campus. Smaller structures, including the President's House and the Maintenance Building, are generally located on the periphery of the central campus core. (See Existing Building Use and Infrastructure, Exhibit M).

The campus land use patterns proposed in this Campus Plan remain largely unchanged from existing patterns. Because of the constraints of the existing site topography and mature vegetation, as well as the desire to strengthen the original campus organization and principles of an “academic hill town,” the new construction will provide additional student housing consistent with the existing campus development and eliminate existing obsolete facilities. Specifically, Wesley Seminary plans to demolish Straughn Hall, Carroll Hall, the surface parking lot and adjacent one-story maintenance building and the Old President’s House and add 282,061 gross square feet of student housing to the existing space on the campus by the year 2027. The following is a summary description of the proposed new development within the Campus Plan boundaries, according to the four use categories:

- **Residential (R) program replacement and expansion:** The development priority for this category is the demolition of the 1960-era student housing (Straughn Hall and Carroll Hall) and construction of new purpose built student dormitory exclusively for Wesley and A.U. students. The demolition of Straughn Hall and Carroll Hall will eliminate 90 existing beds that will need to be replaced. The 2014 Dorm with a maximum of 76 beds will be maintained. The New Dormitory construction will add approximately 659 new beds. When completed, there will be a net increase of approximately 569 beds on Campus for students, faculty and staff.
- **Academic/Administrative (A) program expansion:** All existing academic and administrative uses and facilities are proposed to remain in the core of the Campus consistent with the Seminary’s current configuration of a focused traditional university campus core, with academic programs in single buildings or in clusters of related buildings.
- **Chapel (C) renovation:** The completed renovation of the existing Chapel incorporated modern design and equipment for 21st Century worship. The existing Chapel is located within the core of the campus along the Massachusetts Avenue campus frontage. No change to the existing Chapel is proposed.
- **Support (S):** Campus utilities and infrastructure have been upgraded and general building systems were upgraded as specific buildings were renovated. All existing buildings are now ADA compliant. To replace the one-story maintenance building to be demolished, the maintenance facility and storage will be located in the underground parking garage.

- **Open Space (O):** As part of the new Master Plan, the central core of the campus will be maintained. The mature vegetation and open space at the perimeter of the campus will be maintained and enhanced by implementation of the Landscaping Plan, including at the former Old President's House site, along University Avenue and along the Massachusetts Avenue driveway.

D. Built Environment

Wesley Seminary's buildings within the existing Campus boundaries include a total of 166,916 square feet of Gross Floor Area. The Campus includes 8 academic, administrative, residence hall, and student services buildings, largely clustered together and designed in a unified architectural style. (See Existing Building Use and Infrastructure, Exhibit M). With the exception of the 2014 Dorm, these buildings are 1960's era modern brick and stone structures, reflecting the prevailing institutional and academic building trends of that time.

The buildings constructed on the campus have always proceeded in compliance with the height and density restrictions of the District of Columbia Zoning Regulations. The Campus is not densely developed when compared to the surrounding residential area or adjacent A.U. Campus. Building heights on the campus range from 25 to less than 40 feet and three stories. (See Existing Building Heights, Exhibit N).

The new student housing construction proposed in the Campus Plan will provide Wesley Seminary with an important opportunity to demonstrate its continued commitment to the architectural integrity of the Campus and its presence in the Spring Valley Neighborhood. As the Campus evolves, new architecture on the Campus will preserve and reflect Wesley Seminary's institutional setting and high-quality architecture. While designed to serve its intended function in support of the Wesley Seminary's broader educational and religious mission, the new student housing is both distinctive and inviting, contributing to the overall

character of the Campus setting. This new development is sensitive to adjacent buildings and the surrounding context and will be designed to prevent and/or mitigate adverse impacts. The height and density of the new student housing is appropriate for its central location and proximity to existing and proposed A.U. buildings and the function it will serve.

E. Open Space and Pedestrian Network

Since its inception, Wesley Seminary has endeavored to provide an environment that is conducive to human development and learning while respecting the open space and distinct edges formed by the site's natural topography. Open space areas, located both along street edges and internal to the academic core, are key characteristics of the Campus. Most noticeable are the Wesley statue grove, located at the intersection of University and Massachusetts Avenues, and the sloping perimeter hills dotted with mature trees, popular for neighborhood sledding in winter, park-like space for family picnics and dog owners, Family Movie Nights, "Spring in the Valley" and outdoor yoga. Internally, an academic quadrangle unifies the central campus academic core, serving as ceremonial and formal open space on campus while also providing space for more informal interaction.

Diverse plantings on Campus help to make the campus and its outdoor areas even more attractive. The Seminary campus also includes a network of pedestrian paths that have evolved throughout the inner block areas of Campus. (See Existing Open Space System and Pedestrian System, Exhibit Q).

This Campus Plan maintains Wesley's current approach of strengthening and concentrating the open space system within the area generally considered the central campus core, while respecting the mature, naturally landscaped campus perimeter. Increasing and

intensifying landscaping on Campus, including around the new student housing and along University Avenue, will continue to be a priority for the Seminary in order to create open and inviting views and opportunities for relaxation and interaction throughout the Campus (See Proposed Open Space and Pedestrian System, Exhibit P) and maintain a strong buffer between the central core of the Campus and the adjacent neighborhood. (See Landscaping Plan, Exhibit 3, Aerial Views, Exhibit 4).

Pedestrian corridors will continue to be developed and encouraged to create better connections throughout the campus, to enhance pedestrian safety, and to create places for meetings and interaction. To this end, the Campus Plan includes open space around the new Dormitory and between the existing 2014 Dorm which will create a new open space conducive to the use and enjoyment by the residents of both buildings.

F. Historic Preservation

The Wesley Seminary does not include any structures designated as historic landmarks, nor is the Campus located in an historic neighborhood or district.

G. Campus Identity

The distinct physical environment of the Wesley Seminary Campus is characterized by the inherent order created by the steeply sloped natural topography and resultant hilltop development, which establishes an organizational framework for buildings, street edges, and internal development. (See Existing Site Amenities, Exhibit Q).

Under this Campus Plan, Wesley Seminary proposes to maintain the underlying campus organization and distinct campus identity, which is defined by the central core and wide-open

spaces between the campus buildings and the Massachusetts and University Avenue boundaries with the neighborhood. The Campus Plan specifically calls for the maintenance and enhancement of the existing Green Open Space. (Exhibit P).

H. Transportation

The current vehicular circulation pattern is a two-way access from Massachusetts Avenue and with exit only from University Avenue. (See Existing Vehicular Circulation Network, Exhibit R). Based on intersection and automobile count data as well as the testing of several circulation options and input from the community, the Master Plan is proposing to maintain the two-way access from Massachusetts Avenue. The University Avenue entrance will be further restricted to prohibit vehicles from exiting on to University Avenue. Limited two-way access for emergency, service, and delivery vehicles will be maintained. (See Proposed Vehicular Circulation Network, Exhibit S). At both Massachusetts Avenue and University Avenue, right turn only will be permitted for vehicles. This will allow better site access, especially access to and from the surface parking from Massachusetts Avenue, while minimizing the use of University Avenue and preventing commercial vehicles from driving into and through the residential streets of Spring Valley.

The Wesley Seminary Campus is well served by public transportation systems. The Tenleytown Metrorail station is approximately ½ mile to the east of Campus and A.U. offers shuttle bus service to the station. The Campus is also served by the N3, N4, N6, and N8 Metrobus lines along Massachusetts Avenue, NW and N2 and M4 Metrobus lines nearby along Nebraska Avenue, NW.

Although the use of public transportation by all members of the campus community is strongly encouraged and supported, Wesley Seminary recognizes that not everyone has convenient access to public transportation and that many students, faculty, staff, and visitors drive to campus. Accordingly, Wesley plans to maintain adequate off-street parking inventory to meet the parking needs of the Campus, including surface parking facilities that will be retained on Campus and the two levels of underground parking with 264 parking spaces in the New Dormitory, including a maximum of 105 spaces dedicated for Seminary use. In order to maintain the Green Open Space buffer to the neighborhood, parking has been concentrated within the central core of the Campus and underground.

The Transportation Demand Management (“TDM”) Plan that was submitted as part of the original Campus Plan Application (ZC Case No. 22-23) continues to apply and has been updated to the current development. (Z.C. Exhibits 16G, 19, 20A and 80).

The TDM Plan concludes that the Project will not have a detrimental impact on the surrounding transportation network assuming the proposed site design elements are implemented. Furthermore, there are several positive design elements that minimize potential transportation impacts, including but not limited to the following:

- The site’s proximity to transit service and bicycle infrastructure;
- The site’s location within a generally adequate pedestrian network along major walking routes;
- The site’s loading facility design, which maintains loading activity within private property and provides loading circulation that ensures head-in / head-out truck movements are performed from the public roadway network;
- The inclusion of secure long-term bicycle parking spaces that meet zoning requirements;
- The inclusion of short-term bicycle parking spaces within the site that meet zoning requirements; and

- A TDM Plan that reduces the demand of single-occupancy, private garage vehicles during peak period travel times and shifts single-occupancy vehicular demand to off-peak periods.

Additionally, DDOT has requested and the Seminary has agreed to implement, at its expense, the following sidewalk and public space improvements:

1. Prior to issuance of the final certificate of occupancy for any new building, WTS will construct the following pedestrian improvements:

- A sidewalk along the east side of University Avenue NW between Massachusetts Avenue and Rodman Street, subject to DDOT approval, with a leadwalk into campus along at least one side of the site driveway;
- Install signage, crosswalk and ADA curb ramps on the south leg of University Avenue at the Rodman Street intersection, subject to DDOT approval.
- Install signage, crosswalk and ADA curb ramps on the east leg of the campus driveway at the University Avenue and Sedgwick Street intersection or construct the crossing as a continuous sidewalk, subject to DDOT approval; and
- Install wayfinding signage on the Wesley Seminary campus directing students to the gated connection to the American University campus.

The Applicant will continue to work with the District Department of Transportation (“DDOT”) to refine the proposed conditions and clarify the timing in which they will be completed.

I. Utilities

The Campus is served by an existing network of utilities, including water, sanitary sewer, storm, gas, electric, telecommunications, and cable television. In 2007, a substantial upgrade and renovation of the underground, utility system, including steam pipes, telecommunications, and electrical services was completed. These utilities are located both within the actual roadway pavement and also between the buildings and the roadway curbs. Utility systems are owned and

operated by the District of Columbia, or private utility companies. (See Major Utilities, Exhibit T).

The upgraded utility systems within the Campus have excess capacity for additional development to the maximum floor area as established by the zoning of campus properties.

Utilities are easily accessible to almost every part of the Campus through the public right-of-way. No easements are required for connections to these existing public utilities. The existing water service includes both fire and domestic distribution within the same water mains located in the street; no separation exists between these systems. Flow tests in this area show that the pressures are adequate for domestic water delivery, but require fire pumps for multi-story construction.

The existing 4,000 amp electrical service is adequate for both commercial and residential development. Telecommunication service parallel to the electrical service is also provided to various buildings on the Campus. Gas service has more than adequate provisions for service to all areas of the Campus.

All utility systems serving the Campus are provided by the District of Columbia, or private utility companies. The existing infrastructure provides adequate public facilities to fully develop the area within the perimeter of the Campus over the ten-year term of this Plan without significant degradation of service or capacity.

VI. ZONING REGULATION COMPLIANCE

The Wesley Theological Seminary Campus Plan complies in the following respects with the requirements of Subtitle X, Sections 101 and 901 of the District of Columbia Zoning

Regulations:

- A. College or University which is an Academic Institution of Higher Learning (Sub-section 101.1)

By Act of the General Assembly of the State of Maryland, The Wesley Theological Seminary was chartered as an educational institution of higher learning.

- B. The Use is Located So That It Is Not Likely to Become Objectionable to Neighboring Property (Sub-section 101.2)

1. Noise

Activities within the Campus Plan boundaries are centrally located and designed so as to minimize noise (and visual) impacts on the surrounding community. New facilities proposed in this Campus Plan will also be centrally located and isolated from the surrounding neighborhood with minimum impact on the community in terms of noise. In an effort to reduce noise, the Seminary will continue to abide by the following measures:

- Locating Campus activities so as to satisfy the need of students, faculty and residents for a quiet and secure place to study, work and live, with attention to the need to minimize impacts on the community; and
- Locating and designing loading docks and mechanical systems to reduce, as much as possible, the noise they produce.

2. Traffic

The Seminary encourages the use of public transportation by all members of the Wesley community, while recognizing that not everyone has convenient access to public transportation

and that some students, staff, and visitors must drive to campus due to other commitments, such as childcare, evening activities, disabilities, and the like. To mitigate traffic impacts of the campus on area streets, Wesley has further limited vehicles leaving the Campus from the University Avenue exit. Additionally, Wesley Seminary will implement the robust Transportation Demand Management Plan established by DDOT to meet the needs of the campus over the ten-year term of the Plan.

3. Number of Students

a. Enrollment and Residents

The development proposed in the Campus Plan will not create objectionable conditions due to the number of students, residents or other conditions. The Plan maintains the current enrollment levels for the Seminary reflecting the total headcount for full and part-time students. (Student Enrollment and Employee Trends, Exhibit B). Residents will be centrally located on Campus and be subject to strict and enforced Codes of Conduct by Wesley, A.U. and Landmark, including off-campus parking restrictions. As stated above, the Transportation Demand Management Plan will be designed to meet the needs of the Campus over the ten-year term of the Plan. Additionally, the Plan proposes the development of new facilities to meet the needs of the changing student population over the term of the Plan.

b. Personnel

The personnel population on the Campus will increase proportionately to support the academic mission and student population of the Wesley Seminary Campus, but any increase will not be substantial and is capped by the Campus Plan.

C. Compliance with Commercial Use Restrictions (Sub-sections 101.3 - 101.4)

Throughout this Campus Plan process and its predecessor application (ZC 22-13). There has been an ongoing debate on whether the proposed New Dormitory use is a permitted use directly related to the Seminary's educational mission or a commercial use restricted under Subtitle X, Sec. 101.4. Throughout this process, Wesley has consistently maintained that the proposed dormitory to be constructed and operated by Landmark under a ground lease was a permitted educational and residential use on the campus supported by a January 2020 determination by the Zoning Administrator that stated: "I conclude that a new student residence project which includes units featuring private baths and kitchens and offering occupancy to non-WTS students can be considered a dormitory use, pursuant to the Zoning Regulations." (Emphasis in original). ZC Exhibit 16A. This is entirely consistent with the Zoning Regulations focus on the use or function of a property, not its ownership structure or status of its occupants. Further as more fully discussed herein the New Dormitory is not inconsistent with Institutional designation of the Wesley campus under the Comprehensive Plan.

The Zoning Commission confirmed the legitimate university use characterization of the proposed New Dormitory by accepting and approving a text amendment establishing a new Subtitle X, Sec. 101.5 which provides:

101.5 University housing exclusively for use by Wesley Theological Seminary and American University students, faculty, and staff on Square 1600, Lot 819 shall not be subject to the commercial use restrictions in this section if approved by the Zoning Commission as part of a campus plan.

In the context of the pending Campus Plan, Sec. 101.5 addresses the commercial use objections of some opponents of the project and finds in favor of the Applicant's contention that the New Dormitory is a legitimate university use.

D. Compliance with the Maximum Bulk Requirements (Sub-section 101.6)

The property within the Campus Plan boundaries is zoned RA-1. The Zoning Regulations limit campus development to an FAR of 1.8 (687,780 square feet).

When added to all existing buildings and structures on the Campus, development under this Campus Plan is well below the maximum permitted gross floor area prescribed for the Campus. Further, adding the New Dormitory to the Campus brings the total gross floor area of development within the Campus Plan boundaries to a total of approximately 387,040 square feet and an overall FAR of approximately 1.014. Approximately 300,740 square feet of available gross floor area will not be developed.

E. Submission of a Plan for Developing the Campus as a Whole (Sub-section 101.8)

1. Buildings, Parking and Loading Facilities

a. **Buildings**

In determining its future Campus and institutional needs, Wesley has been guided by its strategic vision of "Ministry 2044" and recent self-evaluation. Consistent with this study, the Campus Plan calls for the limited new development to meet its objective to Thrive in Place through the year 2035 and beyond as set forth below:

- **Residential (R) program replacement and expansion:** The development priority for this category is the demolition of the existing Straughn Hall and

Carroll Hall and construction of new student housing for Wesley students, faculty and staff and interested America University students, faculty and staff. When completed, this plan will increase the level, quality and flexibility of housing for Wesley students and their immediate families and provide new and improved housing opportunities for A.U. students, faculty and staff who do not have access to housing on the A.U. Campus and are living off-campus in the surrounding neighborhood. The new student housing will yield a net increase of 569 beds on Campus.

- **Academic/Administrative (A) program expansion:** All academic and administrative uses and facilities are proposed to remain within the perimeter of the Campus consistent with the Seminary's current configuration of a focused, traditional university campus core, with academic programs in single buildings or in clusters of related buildings.
- **Chapel (C) renovation and expansion:** The renovation of the existing Chapel has been completed without the previously approved 5,000 square foot expansion. The renovation provided a space for 21st century worship and achieved ADA accessibility for the entire Trott Administration Building in which the Chapel is located. The existing Chapel is located within the core of the Campus along the Massachusetts Avenue Campus frontage.
- **Support (S):** In preparation for the renovation and limited new construction, Campus utilities have been upgraded. The Seminary's maintenance facility and storage will be located in the underground parking garage.
- **Open Space (O):** The Master Plan maintains and consolidates the central core of the Campus and enhances and expands the existing Green Open Space. Demolition of the Old President's House and re-landscaping that area will enhance the Campus along University Avenue.

(See Proposed Land Use, Exhibit U; Proposed Building Use and Infrastructure, Exhibit V; and Proposed Building Heights, Exhibit W).

b. Parking

The Campus Plan reduces the existing surface parking in the central core of the Campus, but the two levels of underground parking (264) in the New Dormitory will provide a total of 295 parking spaces on the Campus for students, employees, residents and visitors. This increased level of parking, in conjunction with the Traffic Demand Management program to be continued and enhanced, will meet or exceed the demand for off-street parking for the Campus and minimize off-campus parking.

c. Loading

Many of the Seminary's general deliveries take place at the Kresge Academic Building, while certain special deliveries occur at loading docks and departments located throughout the Campus, including at the central plant facility in the 2014 Dorm. Limited use of the University Avenue entrance for service and delivery vehicles only will limit the traffic impact on the neighborhood and provide easy access to the Kresge Building and 2014 Dorm. Loading facilities for the New Dormitory will be located inside the building and accessed only to and from Massachusetts Avenue. As part of the Traffic Demand Management Plan included in the Campus Plan, a truck management program will be implemented to reduce the impact of Campus-related trucks on neighborhood streets. The Plan includes a truck circulation route that identifies the main routes that delivery vehicles should use to access loading facilities on Campus, while discouraging the use of neighborhood streets. (Proposed Vehicular Circulation Network, Exhibit S).

2. Screening, Signs, Streets, Public Utility Facilities

a. Screening

The landscaped elements of the Campus Plan seek to enhance the visual impact of the Campus, form a stronger sense of place, create a sense of harmony with the surrounding community, improve pedestrian connections, and enhance Wesley's open space system. The Campus Plan proposes to continue to enhance Wesley's open space system within the central campus core and perimeter and increase and intensify landscaping on Campus. (Proposed Open Space and Pedestrian System, Exhibit P; Proposed Site Amenities, Exhibit X; and Landscaping Inventory, Plan and Playground, Exhibit H, Exhibits 3 and 4).

b. Signs

The Campus Plan calls for maintenance of Wesley's existing signage and amenities programs, including building identification, directories and other exterior graphics. A new small sign identifying the New Dormitory will be proposed for the Massachusetts Avenue entrance. The Plan also proposes to develop major perimeter gateways and campus core gateways through the use of signage. The gateways will not only create clarity for both pedestrians and vehicular traffic, but also will aesthetically enhance the interface between the surrounding community and the Campus. (See Proposed Site Amenities, Exhibit X). Signage and other means as required will be used to restrict the use of the University Avenue exit.

c. Streets

Additionally, the Campus Plan calls for using Massachusetts Avenue as the principal means of ingress and egress to the Campus. The use of the University Avenue entrance will be restricted for private vehicles and limited to service and delivery vehicles and emergency vehicles, and restriction on exiting private vehicles. (Proposed Vehicular Circulation Network, Exhibit S).

d. Public Utilities

There are no current plans or requirements for any utility expansions within or immediately adjacent to the Campus, and no special utility development conditions are expected to be required within the Campus during the period covered by this Plan. General upgrades and improvements to existing utilities, including upgrades to the main water line and other utilities improvements have been completed.

3. Athletic and Other Recreational Facilities

Renovation and improvements to the Seminary's existing recreational facilities and additional facilities in the New Dormitory will serve the recreational needs of the Seminary community. A small community playground is proposed in the area of the three residential lots setback from University Avenue. (Exhibits 3 and 4).

4. Description of All Activities and Capacity of All Present and Proposed Campus Development

The activities to be conducted on Campus include those activities associated with general seminary and educational use as well as auxiliary uses. Five land use categories are used to identify and describe campus activities: Academic/Administrative (A), Residential (R), Chapel (C), Support (S), and Open Space (O). (See above, Section IV, C. Land Use). The proposed Campus land use patterns will remain largely unchanged and the planned new Dormitory will continue to provide an environment consistent with the existing Campus. (See Proposed Land Use, Exhibit U).

F. Interim Use of Land is Continued (Sub-section 101.10)

The proposed Campus Plan does not require any interim use of land on the Campus.

G. No New Use Sought for Approved Site of Buildings Moved Off-Campus (Sub-section 101.10)

The Seminary does not seek approval for any new use of a previously-approved building site, and thus complies with this section.

H. Compliance with the Policies of the District Elements of the Comprehensive Plan (Sub-section 101.11)

The Wesley Theological Seminary Campus Plan complies with the policies of the District Elements of the Comprehensive Plan. The continued educational use is consistent with the institutional designation on the Future Land Use Map of the Campus.

In order to approve the Campus Plan, the Commission must find that the application is “not inconsistent with the Comprehensive Plan and with other adopted public policies . . . related to the subject site.” 11-X DCMR §§ 304.4(a), 500.3. As detailed below, the Campus Plan is not inconsistent with the Comprehensive Plan.

The District of Columbia Court of Appeals has consistently directed the Commission to review a Campus Plan application in the context of the Comprehensive Plan and other adopted public policies “*as a whole*” under this prong of the Campus Plan evaluation standard. That is, the Commission may find that a Campus Plan application is not inconsistent with the Comprehensive Plan even if the application presents actual or potential inconsistencies with individual objectives or elements of the Comprehensive Plan. Rather, the Commission must weigh and balance competing policy objectives and explain its analysis. As noted below, the Campus Plan is not inconsistent with the Comprehensive Plan and other adopted public policies, when reviewed as a whole.

1. *Future Land Use Map*: The Future Land Use Map (“FLUM”) includes the Campus in the Institutional Land Use Category. The Framework Element of the Comprehensive Plan, adopted in 2020, notes the following with regard to the Institutional Use Category:

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. 10-A DCMR §227.18. A Campus Plan and Campus Plan Approval for the Site and a new dormitory building is clearly consistent with and meets this standard.

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. *Generalized Policy Map:* The "Generalized Policy Map" ("GPM") designates the Campus as "Institutional Uses". The Comprehensive Plan states that:

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. Other institutional sites, including hospitals and religious orders, likewise may see new buildings or facilities added. Policies in the Land Use and the Educational Facilities Elements address the compatibility of such uses with surrounding neighborhoods. 10-A DCMR §225.22.

The Campus Plan will maintain and enhance the Seminary's religious and educational mission and presence in the neighborhood, City-wide and beyond that is entirely consistent with the Institutional Uses designation.

3. *Land Use Element:* The Land Use Element is the cornerstone of the Comprehensive 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. 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. 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. 317.4.

The Campus Plan is consistent with various policies and guidance from the Land Use Element of the Comprehensive 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 siting the new dorm adjacent to A.U.'s high rise dormitory at the far northeast corner of the campus. Wesley has also committed to preserving heritage and special trees on the property, and constructing a playground for public use 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, Z.C. Exhibits 16G, 19, 20A and 80.*

4. *Transportation Element:* The Proposed PUD is consistent with the policies of the Transportation Element of the Comprehensive 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.

5. *Housing Element:* The proposed Campus Plan is not inconsistent with the policies of the Housing Element of the Comprehensive 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*).
6. *Environmental Protection Element:* The proposed Campus Plan is not inconsistent with the policies of the Environmental Protection Element of the Comprehensive 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 proposed new dormitory will be certified LEED Gold (*E Policy 3.2.1*).
7. *Educational Facilities Element:* The Campus Plan is consistent with various policies and guidance from the Educational Facilities Element of the Comprehensive 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.

8. *Rock Creek West Area Element:* The Campus Plan is consistent with various policies and guidance from the Rock Creek West Area Element of the Comprehensive 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 Comprehensive 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 Comprehensive Plan and related public policies *as a whole*.

I. Commitment to Diversity, Equity, Inclusion and Social Engagement

Significantly, this Campus Plan and Wesley Seminary's educational and religious mission are founded upon and committed to supporting racial equity, resiliency and local community engagement and programs.

The Seminary embraces, lives, and professes its commitment to Diversity, Equity, and Inclusion.

The mission of Wesley Theological Seminary (“**Wesley**” or “**the Seminary**”) is to prepare persons for Christian ministry, to foster theological scholarship, and to provide leadership on issues facing the church and the world. Our aim is to nourish a critical understanding of Christian faith, cultivate disciplined spiritual lives, and promote a just and compassionate engagement in the mission of the church to the world.

Wesley is a community of persons in the church, accountable, as all Christian communities are, to the intention of God that all may be one. In recognition of God’s intention, this Commitment to Diversity, Equity, and Inclusion (“**DEI Commitment**”) recognizes **all** humans are made in the image and likeness of God and establishes Wesley as a community that intentionally seeks to include persons of multifarious differences as students, faculty, staff, administrators, and members of the Seminary’s Board of Governors (“**Board**”).

Wesley’s commitment to diversity, equity, and inclusion is to be lived out in our admission and support of students; in the hiring and promotion of faculty, staff, and administrators; in the **selection** of members to the Board; and through the work of Wesley’s Diversity, Equity, and Inclusion Committee (“**DEI Committee**”) and Diversity, Equity, and Inclusion Officer (“**DEI Officer**”) as supported by Wesley’s Board, Administration, faculty, staff, and students. (See Commitment to Diversity, Equity, and Inclusion, Z.C. Exhibit 3A).

At all levels, the Seminary is diverse, including students, faculty, administrators, staff, Board of Governors, and the Christians and persons of other faiths that it touches. The Seminary’s student body demonstrates its diversity by race, sex, age, religion, national origin and sexual orientation. 54% of students are women, 46% men, 33% Black, 31% White, 15% Asian, and 5% International. Its student range in age from the early twenties to seventy or older. More than 60% of the students are ages 30-59 with nearly 25% ages 40-49. Over 30 different denominations are represented from the United States and abroad. Wesley is a majority minority community substantially contributing to the diversity of the neighborhood and Ward 3.

Locally, the Seminary has deep and strong ties with the community. At least 200 alumni are District of Columbia residents who are deeply committed to the City and the lives of its residents through its churches and non-profit organizations.

The Seminary's commitment to our community and other local communities is the mission of its Community Engagement Institute under the leadership of Lorena M. Parrish. Ph.D., Associate Professor of Urban Ministries. The Institute's training and programs are broad and provide resources locally and beyond, including:

- Center for Public Theology
- Community Engagement Fellows Program
- Heal the Sick Program

J. The Proposed Buildings Are Within the Floor Area Limit for the Campus as a Whole (Sub-section 101.5)

When added to all existing buildings and structures on the Campus, the limited new development under this Campus Plan will not exceed the maximum permitted gross floor area prescribed for the Campus. If all proposed development is constructed, the gross area within the Campus Plan boundaries will total approximately 387,040 square feet. This results in an overall FAR of 1.014 significantly below the maximum permitted Campus FAR of 1.8.

K. Referral to the District of Columbia Agencies (Sub-section 101.13)

The Campus Plan application has previously been referred to the Office of Planning (OP), D.C. Department of Transportation (DDOT), and the Department of Energy and the Environment for their review and report. Wesley Seminary has met numerous times with OP.

The Seminary's traffic consultant, Gorove-Slade, is working directly with DDOT to establish the updated Traffic Demand Management Plan based on recent changes to the Campus Plan.

Discussions have been undertaken directly with DOEE.

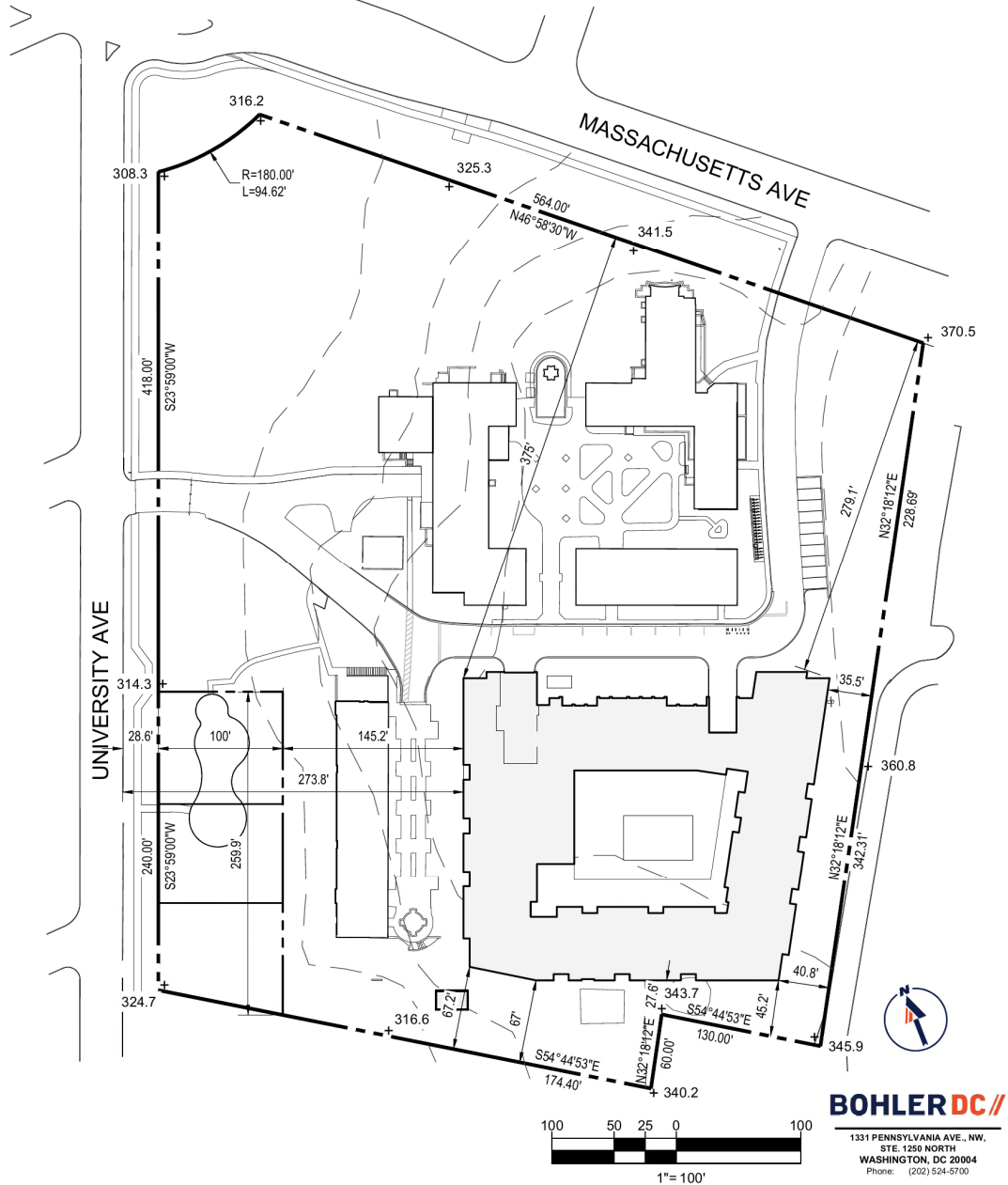
L. Request for Minor Variance Relief

The Zoning Regulations, under Subtitle X § 1000.3, authorizes the Zoning Commission to grant area variance relief as part of a campus plan application pursuant to the variance standards in Subtitle X § 1002.1. Specifically, Wesley is requesting an area variance for a minor deviation in the proposed height of the New Dormitory under the height restrictions in Subtitle F-§203.3 which provides:

An institutional building or structure may be erected to a height not exceeding ninety feet (90 ft.), not including the penthouse or rooftop structure, provided that the building or structure shall be removed from all lot lines of its lot a distance of not less than one foot (1 ft.) for each one foot (1 ft.) of height in excess of that authorized in the district in which it is located.

In the RA-1 Zone, the authorized height is 40 ft., subject to the provisions of §203.3. The height of the proposed New Dormitory is 74'-8". As a result, §203.3 requires the building to be setback 35'-0" from all lot lines. As shown on the Site Plan (Exhibit G), the New Dormitory is set back from the lot lines at least 35'-0" on the east along the north-south boundary with AU (35'-0"), on the north along Massachusetts Avenue (425'+/-) and to the west along University Avenue (300'). However, at the southern lot line the irregular "notch" in the property boundary with AU reduces the required setback to 27'-0" along only a limited portion of the lot line. Beyond the "notch" area, the setback substantially exceeds the minimum 35'-0" required. As a result, the Seminary is requesting an area variance from the height required by §203.3.

WESLEY SEMINARY CAMPUS PLAN
EXHIBIT E - SITE ZONING PLAN



The burden of proof for an area variance is well established. The Seminary must demonstrate that (1) the property is affected by an exceptional or extraordinary situation or condition, that (2) the strict application of the Zoning Regulations will result in a practical difficulty to the applicant, and that (3) the granting of the variance will not cause substantial

detriment to the public good nor substantially impair the intent purpose or integrity of the zone plan. As set forth below, the Seminary satisfies the three-part test for the requested variance relief.

Specifically, the Seminary is affected by several exceptional conditions that both individually and taken together dictate the location of the New Dormitory. The “notch” into the property creates an anomaly or unique configuration of the otherwise continuous straight southern lot line that extends to University Avenue. As a result, several practical difficulties result. The location of the New Dormitory is restricted by the existing improvements on the Campus, including the east-west driveway and walkways, the surrounding existing buildings (Library, Kresge Hall, and the 2014 Dorm), and Heritage Tree which prevents movement of the footprint to avoid the conflict created by the “notch”. Relocation of the New Dormitory in order to comply with the 35’-0” setback would encroach on the existing improvements, undermine the preservation of the Heritage Tree, and prevent the longstanding pedestrian and vehicular circulation on the Campus. These circumstances would be unduly burdensome, if not impossible, for the Seminary to achieve. Finally, the requested variance would be a substantial benefit to the public good, not a detriment, by locating the New Dormitory immediately adjacent to the existing and taller AU buildings and in the farthest corner of the Campus from the surrounding neighborhood on University Avenue and Massachusetts Avenue. This allowance for the isolated “notch” in the property line would not impair the purpose or intent of the RA-1 zone plan which provides for regulating height at this location.



Wesley's tranquil campus is inviting for many visitors.

VII. INCLUSIONARY ZONING

This Campus Plan raised for the first time, a question not previously contemplated by the Zoning Regulations, of if and/or how the IZ requirements could be imposed on student housing built on a university campus, but not exclusively for students on that campus. Under normal circumstances, Subtitle C, 1001.6 (c) provided a clear exemption from IZ for “[h]ousing developed by or on behalf of a local college or university exclusively for its students, faculty, or staff.” Clearly, on campus student housing was intended to be exempt from IZ, but never anticipated that students from two immediately adjacent schools would be housed on one of the campuses.

The Zoning Regulations and DHCD never envisioned a situation when a student dormitory located on a university campus would house students from more than one institution or that the Inclusionary Zoning (“IZ”) would be applicable to an on campus student housing project. In fact, DC Code does not allow college or university students to be eligible for IZ without a parent or guardian:

§ 6-1041.06. Ineligibility of Students

Notwithstanding § 2-1402.21, a person enrolled as full-time student in a college or university shall not be eligible to apply to rent or purchase an inclusionary unit unless the annual income of his or her parent or guardian would qualify under the eligibility standards established by the Mayor, or unless the student is a part of a household that otherwise qualifies for the inclusionary unit. Faced with this unique scenario, Wesley offered to meet the spirit of IZ compliance through a privately administered and DHCD supervised student only affordable housing plan for the proposed New Dormitory.

ANC 3E and others have raised concerns about the operation and need for on campus student affordable housing. Beyond these objections, ANC 3E has championed a solution which Wesley proposes to implement as part of this application. Specifically, ANC 3E has requested that Wesley provide support for the required quantity and affordability of IZ units at an off-site location within the boundaries of its Commission or more broadly in Ward 3.

Wesley remains committed to affordable housing in the District as part of its broader religious and educational mission and accepts ANC 3E’s challenge to provide and/or support fully compliant new IZ housing focused in this neighborhood. The estimated value of the IZ support to be provided by Wesley is \$8 million. As of this writing, Ward 3 has achieved only 10.1 percent of its target for new affordable housing units, and this proposal will be an important

contribution to the neighborhood and its diversity, equity, and inclusion. See DMPED 36,000 by 2025 Dashboard.

More broadly, the possibility of new IZ units is threatened by dramatically reduced resources, including the Mayor’s proposed substantial reduction in budget funding for the Housing Production Trust Fund and the current unavailability of other affordable housing funding and financing programs.

Text Amendment Solution (ZC 24-09)

At its May 9, 2024, public meeting, the Zoning Commission unanimously agreed that Wesley Theological Seminary’s (“Wesley”) proposal to construct a new dormitory to be occupied by both Wesley and AU students should move forward and that the Commission would consider a text amendment to accomplish that objective and address outstanding Commission, ANC, and neighborhood concerns related to Inclusionary Zoning.

On February 27, 2025, the Commission approved Final Action to amend the Zoning Regulations to establish a new provision Subtitle C, Section 1006.10. The Notice of Final Rulemaking has not been published, but below is the current draft of the final regulation. In taking Final Action the Commission clarified the amendment to provide that the minimum level of required IZ could be increased, but not decreased.

1006.10 Wesley Theological Seminary shall provide off-site IZ located in Ward 3 as an enforceable condition to its 2022-2032 Campus Plan further processing to construct university housing on Wesley’s campus, provided that the requirements of Subtitle C §§ 1006.1 - 1006.3(a)-(g), may be waived by the Zoning Commission for the off-site IZ. Depending on construction type, the off-site IZ provided shall be no less than Subtitle C §1003.1 or §1003.2 set-aside requirements, as applicable, and subject to the requirements of

Subtitle C §§ 1006.5 - 1006.9. Notwithstanding the foregoing, and for good cause shown, the Zoning Commission shall have broad discretion to determine that the off-site IZ requirement described in this provision can be satisfied by alternative means, including increasing [or decreasing] the set-aside requirements described herein and/or by requiring Wesley to make a financial contribution, deemed sufficient by the Zoning Commission, to an organization(s) that will facilitate the construction of new affordable housing reserved for households at or below 60% of median family income for rental units or at or below 80% of median family income for ownership units exclusively in Ward 3, provided that such alternative means is stated as an enforceable condition to the 2022-2032 Campus Plan further processing to construct university housing on Wesley's campus. (Emphasis added). [Highlighted language to be deleted in Final Version].

APPLICABLE IZ REQUIREMENTS

The New Dormitory will be Type 3 Construction which under Subtitle C, Sec. 1003.1 (a) requires a minimum of ten percent (10%) of the residential gross floor area be set aside for Inclusionary Zoning units. In calculating the required level of IZ, Wesley has not exempted any of the area for exclusively Wesley units in the new building 30,513 sf. Also, unlike other IZ projects with the affordable housing subsidized by authorizing up to 20% bonus density, Wesley has not requested or realized any bonus density. The table below provides an Inclusionary Zoning Analysis for the New Dormitory. As set forth, Wesley is proposing to provide the value of almost 11% which exceeds the minimum 10% required, without Wesley exemption or benefit of bonus density provided for all other IZ projects.

| New Dormitory – Inclusionary Zoning Analysis | |
|--|------------|
| Proposed Total Gross Floor Area | 282,061 sf |
| Net Residential Gross Floor Area | 224,359 sf |
| Required IZ Set-Aside @ 10% (Type 3 Construction) | 22,436 sf |
| Unrealized 20% IZ Bonus (Maximum) | 56,412 sf |
| Unrealized Wesley IZ Exemption (90/659 beds = 13.6%) | 30,513 sf |
| Estimated Value/Cost of 10% IZ @ \$325/sf | 7,291,700 |

Proposed \$8,000,000.00 IZ Off-site IZ Fund @ 325/sf = **24,615 sf (10.97%)**

1. Proposed Ward 3 Inclusionary Zoning Revolving Fund.

As acknowledged by the Zoning Commission during their deliberations on the Text Amendment, Wesley and Landmark are not an affordable housing developer and as such cannot directly develop the offsite affordable housing. In collaboration with ANC 3E, Wesley made its best efforts to identify a Ward 3 development project(s) that would be willing to provide the offsite IZ units.

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 to 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 or uncertain 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.

For all the stated reasons, Wesley has demonstrated "good cause shown" under §1006.10 that the off-site IZ requirements can properly be satisfied by alternative means, including making a financial contribution deemed sufficient by the Commission as part of the Campus Plan approval process.

Given these obstacles and upon the recommendation of DHCD and others, Wesley enlisted the assistance of Local Initiatives Support Corporation ("LISC") to explore alternative means of compliance. LISC is a nationwide affordable housing community development organization that has operated in DC for 42 years. 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.

2. Operation of Ward 3 Inclusionary Zoning Revolving Fund

LISC is a Community Development Financial Institution, certified by the US Treasury Department, with over 40 years operating in the DC market. To date, LISC DC has invested \$557 million in the District, leading to the preservation or creation of over 15,000 affordable homes. LISC has experience managing revolving loan funds, similar to the proposed Ward 3 Revolving Loan Fund. LISC DC is a fund manager of the DC Preservation Fund, a \$50 million revolving loan fund, managed on behalf of DC Department of Housing and Community Development (DHCD). To date, LISC has preserved over 1,200 of units of affordable housing through this fund.

The purpose of the Ward 3 fund will be to: *Serve as a vehicle to offer flexible, low-cost capital to promote the production and preservation of affordable housing in Ward 3. Through blending Ward 3 funds with LISC capital, the Fund will add catalytic investment into Ward 3 affordable housing.*

The Ward 3 Revolving Loan fund will operate with the following structure.

1. Execution of Ward 3 Grant Agreement between Wesley and LISC
 - a. The Grant Agreement will outline stipulations of the funding, including resident affordability requirements and geographic requirements (ensuring projects are located within Ward 3).
2. Receipt of Funds
 - a. Wesley will wire or transfer the Revolving Loan Fund capital to LISC and LISC will hold in a designated account, only to be drawn for specifically qualified projects. LISC manages a myriad of distinct capital sources across its national footprint.
3. Sourcing Projects
 - a. LISC has longstanding partnerships with mission-driven developers throughout the District, including affordable developers within Ward 3. We are currently engaged in 4 projects that are challenged to secure low-cost capital to make the affordable projects sustainable over time.
 - b. While we anticipate news of these funds will spread quickly within the affordable development world, we will also share information in local convenings such as through our work with [The Coalition](#) and [The Housing Association of Nonprofit Developers](#), through promoting availability of these funds on LISC's website, and preparing and disseminating term sheets.
 - c. Given the dearth of affordable development in Ward 3, we are confident this tool will be highly sought.
4. Vetting and Underwriting Projects
 - a. Each loan will undergo LISC's rigorous underwriting process to ensure alignment with LISC's mission, feasibility, compliance with the Fund's goals, as well as the long term financial and strategic viability of the project.
 - b. Among the main criteria that would be required, as applicable, include securing corporate and personal guarantees, securing a lien on the property, reviewing borrower financial statements, credit reports and Real Estate Owned (REO), analyzing borrower's experience and composition

of the team, as well as analyzing the timing, financial and logistical hurdles to ensure the project is able to come to fruition.

- c. Each loan will be assessed through LISC's Credit review process and Credit Committee, where the loan will undergo another analysis to ensure project viability. Should the Committee approve the loan, we will begin the closing process.

5. Closing

- a. LISC legal or outside counsel will close the loans, in conjunction with LISC program officer who completed the underwriting and LISC loan closer.
- b. During project closing, counsel will incorporate long term affordability covenants, as tied to use of Ward 3 Revolving Loan Fund. Each project will have a covenant that meets or exceeds the specified affordability guidelines and term of enforcement.

6. Repayment

- a. As loans which have incorporated Ward 3 capital are repaid to LISC, LISC will replenish the Ward 3 Revolving Loan Fund with said capital, in order for capital to be revolved into future affordable Ward 3 projects.

7. Annual Report out of Projects

- a. On an annual basis, LISC will report out Ward 3 Loan Fund metrics in order to share project successes. LISC will report on Ward 3 Loan Fund capital expended to date, amount remaining, and amount revolved back. The report will list each project financed, including affordability tiers of each property, and the number of homes created or preserved as a result of this financing.

VIII. SATISFACTION OF REQUIREMENT FOR ZONING COMMISSION REVIEW THROUGH A RACIAL EQUITY LENS

Comprehensive Plan

As set forth below, the proposed Campus Plan is not inconsistent with the Comprehensive Plan, as recently adopted by the D.C. Council pursuant to D.C. Law L23-0217 (Comprehensive Plan Amendment Act of 2017) and D.C. Law 24-0020 (Comprehensive Plan Amendment Act of

2020), including the Generalized Policy Map (“GPM”) and Future Land Use Map (“FLUM”) (D.C. Resolution R24-0292), collectively referred to herein as the “Comp Plan”.

Racial Equity Lens

1. Introduction and 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.

1.1. 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.

1.2. 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, faculty and staff. |
| 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**.

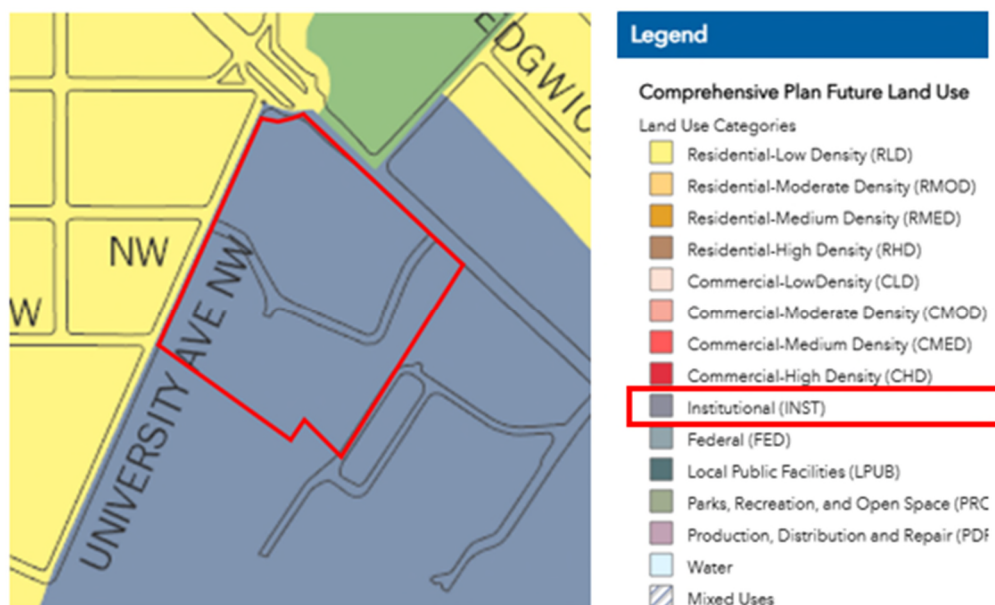


FIGURE 1: FUTURE LAND USE MAP

The Framework Element describes this designation as follows:

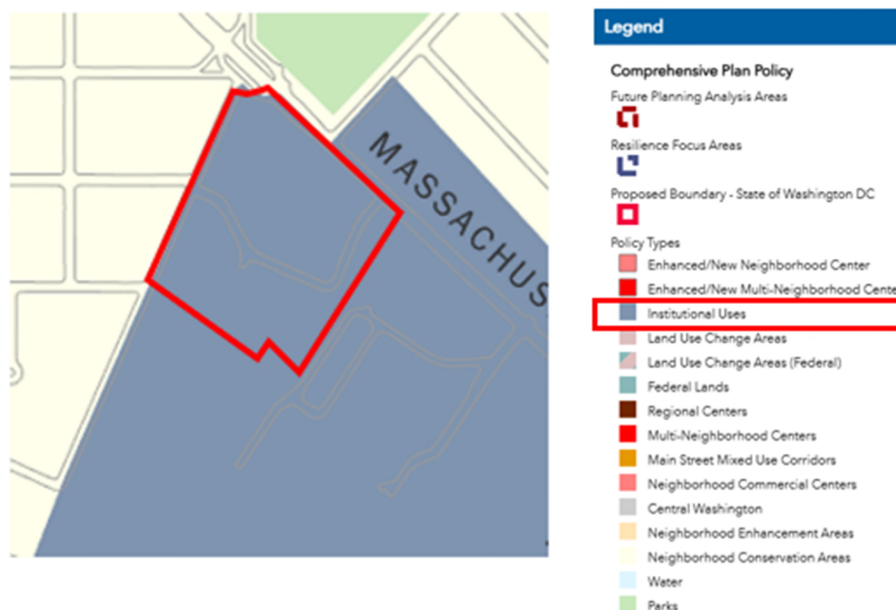
- **Institutional**: This designation includes land and facilities occupied and used by colleges and universities, large private schools, hospitals, religious organizations, and similar institutions. While included in this category, smaller institutional uses such as churches are generally not mapped, 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 siting the new dorm adjacent to A.U.'s high rise dormitory at the far northeast corner of the

campus. Wesley has also committed to preserving heritage and special trees on the property, and constructing a playground for public use 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 _____.

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 meet LEED Gold standards (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

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.>

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.

2.3.5. 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

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

3

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

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

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.
1. April 2022 - City Ridge, a large Inclusionary Zoning (IZ) project began to deliver affordable units.
 2. 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%.
 3. 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.

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

4. 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

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

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

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 twenty 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, Spring Valley Neighborhood Association and other interested parties and individuals. This process has been candid and 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, including forty-five meetings (CLC-19; ANC 3D-22; ANC 3E-4).

| Date | Meetings / Presentations |
|-------------------|--|
| July 30, 2019 | CLC Meeting |
| April 1, 2020 | CLC Meeting |
| December 1, 2020 | Meeting with Troy Kravitz, ANC 3D02, Elizabeth Pemmerl, ANC 3D03-Elect |
| January 14, 2021 | CLC Meeting |
| February 3, 2021 | ANC 3D Meeting |
| February 18, 2021 | CLC Meeting |
| September 9, 2021 | CLC Meeting |
| October 21, 2020 | CLC Meeting |
| November 3, 2021 | ANC 3D Meeting |
| December 8, 2021 | ANC 3D Meeting |
| February 16, 2021 | CLC Meeting |

| | |
|--------------------|--------------------------------------|
| March 2, 2022 | ANC 3D Meeting |
| March 9, 2022 | CLC Meeting |
| March 30, 2022 | CLC Meeting |
| April 6, 2022 | ANC 3D Meeting |
| April 21, 2022 | ANC 3E Meeting |
| May 9, 2022 | CLC Meeting |
| May 12, 2022 | CLC Meeting – Transportation Focused |
| May 12, 2022 | CLC Meeting |
| May 24, 2022 | CLC Meeting |
| June 1, 2022 | ANC 3D Meeting |
| September 7, 2022 | ANC 3D Meeting |
| November 2, 2022 | ANC 3D Meeting |
| January 31, 2023 | PUD 101 Introduction by OAG, ANC 3D |
| February 8, 2023 | CLC Meeting |
| March 22, 2023 | CLC Meeting |
| April 4, 2023 | ANC 3D Meeting |
| May 3, 2023 | ANC 3D Meeting |
| May 15, 2023 | CLC Meeting |
| July 5, 2023 | ANC 3D Meeting |
| July 25, 2023 | ANC 3E Meeting |
| August 8, 2023 | CLC Meeting |
| August 14, 2023 | ANC 3D Meeting |
| September 6, 2023 | ANC 3D Meeting |
| February 7, 2024 | ANC 3D Meeting |
| March 4, 2024 | CLC Meeting |
| March 6, 2024 | ANC 3D Meeting |
| April 3, 2024 | ANC 3D Meeting |
| April 11, 2024 | ANC 3E Meeting |
| May 1, 2024 | ANC 3D Meeting |
| July 10, 2024 | ANC 3D Meeting |
| September 23, 2024 | ANC 3E Meeting |
| January 8, 2025 | ANC 3D Meeting |
| February 20, 2025 | CLC Meeting |
| April 2, 2025 | ANC 3D Meeting |
| May 7, 2025 | ANC 3D (scheduled) |
| May 8, 2025 | ANC 3E (scheduled) |

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 supporting affordable housing within Ward 3 with the ANCs.

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. More recently, the top level of the proposed dormitory has been eliminated.

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 90-100 student beds, with a new dormitory that will offer approximately 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 supported 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 205,000 square feet (4.7 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 12, 2025, a total of 19 Community Liaison Meetings and 26 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 approximately 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 19 Community Liaison Meetings and 26 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.

IX. HEARING PRESENTATION AND WITNESSES

A. Applicant's Presentation:

Estimated Time Required for Presentation of the Applicant's Case (11-Z DCMR §401.1(g)). The Applicant estimates it will require one (1) hour to present its case.

B. Witnesses:

1. Rev. David McAllister-Wilson, President, Wesley Theological Seminary
2. Rev. Dr. W. Antoni Sinkfield Assoc. Dean of Community Life and Campus Operations

3. Eric Leath, Director Development, Landmark Properties
4. Ramon Jacobson, Executive Director
Bryan Franklin, Deputy Director, Wesley MTS '21
Melanie Stern, Senior Lending Program Officer
Local Initiatives Support Corporation, DC
5. Patrick McAnaney, Development Director, DC

C. Expert Witnesses:

6. Brandice Elliott, AICP
Director of Planning Services
Holland & Knight, LLP
Scope of Testimony: Permitted Uses under Campus Plan, Comprehensive Plan,
Racial Equity
7. Jack Owen Boarman, AIA, NCARB, CID
Partner-in-Charge, BKV Group, Architects
Scope of Testimony: Proposed Design of New Dormitory
8. Stephen Karcha, Certified CM, LEED AP, GRP
Vice President of Project and Construction Management
Scope of Testimony: Existing and
Proposed Campus Development, Playground, Construction Management
9. William Zeid, PE
Senior Associate and Project Manager
Gorove Slave Transportation Planners and Engineers
Scope of Testimony: Transportation Evaluation and Planning, TDM, Future
Monitoring.

For each of the proposed expert witnesses a current resume or CV has been previously filed in this case. (Z.C. Exhibit 16J). Each of these witnesses have previously been accepted as an expert witness in their respective disciplines by the Zoning Commission and/or Board of Zoning Adjustment.

X. APPLICANT'S DRAFT CONDITIONS

The Seminary developed the following draft proposed Conditions to be imposed in conjunction with the new Campus Plan application. The proposed conditions were the subject of ongoing review by the Office of Planning and DDOT and continuing community engagement with ANC 3D and 3E, the Community Liaison Committee, and other interested parties.

In consideration of the record and the Findings of Fact and Conclusions of Law herein, the Zoning Commission concludes that the Applicant has satisfied its burden of proof and therefore **APPROVES** the campus plan application, subject to the following guidelines, conditions, and standards:

1. Approval of the Campus Plan shall be valid for ten (10) years beginning with the effective date of this Order.
2. The Campus boundaries shall include Lots 6 (818 and 819), 7, 8 and 9 in Square 1600 with a land area of 381,878 square feet (8.77 acres).

Enrollment and Employee Population:

3. Wesley student enrollment headcount during the life of the Campus Plan shall be subject to the following Academic Year (September through August) limit of 1,000 full and part-time degree and non-degree students attending classes on campus, including Master of Divinity (M.Div.), Master of Theological Studies (M.T.S.), Master of Arts (M.A.), Doctor of Ministry ((D.Min.) degree students attending two-week sessions on campus during off-semester periods, and for Course of Study non-degree students attending weekend (Friday Night-Saturday) or two-week summer on campus programs. All students in degree and non-degree programs that participate entirely off-campus or by remote or virtual classes are not subject to this enrollment cap.
4. The number of Seminary employees (headcount) over the life of the Campus Plan shall not exceed 100 employees (including all full and part-time), excluding non-Wesley employees managing and operating the New Dormitory. Not more than 12 employees (full and part-time) will be employed to manage and operate the New Dormitory, but excluding any student resident assistants/community ambassadors living in the student residential building.

Campus Development:

5. The total build out of the campus facilities (including existing buildings) shall not exceed 387,040 square feet of gross floor area or 1.014 FAR during the term of the Campus Plan. Based on the 1.8 FAR permitted for university campuses located in the RA-1 zone pursuant

to Subtitle X, Section 101.5, unused gross floor area of approximately 300,740 square feet shall remain undeveloped.

6. Vehicular parking spaces on the campus including below grade and surface spaces shall not exceed 295 spaces. Approximately 264 spaces will be located below grade in the New Dormitory and 31 surface parking spaces will be located elsewhere on the campus in accordance with Exhibit ____.
7. The Applicant shall provide a maximum of 735 total beds on the campus to include not more than 659 beds in the New Dormitory and 76 student beds in the existing 2014 Dorm.
8. The Applicant will implement a campus-wide security and monitoring system in accordance with Exhibit _____. The Seminary will also designate and publicize a Community Point of Contact (telephone hotline and electronic mail) to be available 24/7 to respond to security, illegal parking, and other potential adverse impacts on neighboring properties.

The New Dormitory:

9. The New Dormitory will house only enrolled Wesley and American University students, Wesley and AU faculty and staff (and their immediate families if any), resident management personnel and student resident assistants/ambassadors. "Immediate families" include spouses or domestic partners, and dependent children under the age of 18 living in the same unit as the enrolled Wesley and American University students, faculty or staff.
10. The New Dormitory will have a maximum height of 74 feet, 8 inches. It will have a maximum total gross floor area of 282,061 square feet. Two levels of underground parking (approximately 264 spaces) and internal loading and trash facilities will be provided. Use of the underground parking spaces shall be restricted to Wesley faculty and staff and residents and staff of the New Dormitory. A portion of the underground parking will be utilized for Wesley maintenance facilities and storage.
11. **For the life of the Project**, the New Dormitory will include an access security system and security cameras will be installed on the campus as generally shown in Exhibit ____.
12. Resident leases for the New Dormitory will include a code of conduct and resident management staff and student resident assistants /ambassadors will monitor compliance. Leases will also include a parking addendum which prohibits residents from parking offsite on restricted residential streets and applying for a Residential Parking Permit. Enforcement will include a system of warnings and lease nonrenewal or expulsion in accordance with D.C. laws.
13. The New Dormitory will include approximately 216 units configured in studio, one, two, three, four and five bedroom units with not more than 659 beds. Each unit will contain a kitchenette and larger units will be designed as co-living units with separately leased bedrooms and common kitchen and living areas.

14. AU students, faculty and staff residing in the New Dormitory will have access to all Seminary facilities, including the library and dining facilities.
15. The Applicant shall provide the environmental and sustainable benefits for the Campus in accordance with this condition:
 - A. **The Applicant shall submit with its building permit application for the New Dormitory** a checklist evidencing that the New Dormitory has been designed to achieve the equivalent of LEED Gold under LEED v.4 for Homes and Multifamily Midrise.
 - B. **Prior to the issuance of the final residential Certificate of Occupancy for the New Dormitory**, the Applicant shall demonstrate to the Zoning Administrator that it has incorporated the following into the design of the Project:
 1. Green roofs;
 2. Stormwater management;
 3. Limited rooftop mechanical equipment; and
 4. Dark Sky compliance.

Green Open Space, Landscaping and Playground:

16. The Applicant will maintain and **prior to the final residential Certificate of Occupancy for the New Dormitory** install the new Campus Plan landscaping in the existing Green Open Space Buffer Zone on University Avenue and Massachusetts Avenue in substantial accordance with Exhibit _____. Designated green open space of approximately 205,000 square feet of land area is to be preserved and not available for future development.
17. **Prior to the issuance of the final residential Certificate of Occupancy for the New Dormitory**, the Applicant will build a small community playground to be set back from University Avenue as shown in Exhibit _____. The playground will measure approximately 40 feet by 95 feet and have an area of approximately 3,800 square feet with a natural double shredded hardwood mulch safety surface surrounded by a 48 inch tall vinyl-coated chain link perimeter fence. It will include benches and play equipment suitable for toddlers and young children. The playground will have a public point of entry adjacent to University Avenue, N.W. by means of an accessible sidewalk. It will be fenced and open to the public only during daylight hours. The final design of the playground will be substantially in accordance with Exhibit _____.
18. The Applicant will implement the Landscape Plan in substantial accordance with Exhibit _____.
19. The Seminary will work with its Community Liaison Committee to review and make best efforts to achieve consensus on final plant and tree selections within the ranges included in

the Landscape Plan to create an effective and aesthetically pleasing interface between the Campus and the surrounding neighborhood.

Off-Site Inclusionary Zoning:

20. The Applicant shall establish and fund a Ward 3 Inclusionary Zoning Revolving Fund (“Ward 3 Fund”) to be administered by Local Initiatives Support Corporation (“LISC”) to provide the equivalent or greater level of Inclusionary Zoning than would be applicable to the New Dormitory in accordance with Subtitle C, §1006.10 as established by Z.C. Case No. 24-09.
21. Prior to the issuance of the final Certificate of Occupancy for the New Dormitory, the Applicant will fund the Ward 3 Fund with a payment of \$8 million dollars (\$8,000,000.00) to LISC. The Applicant will provide documentation for the LISC payment to the Zoning Administrator and ANC 3D and ANC 3E.

Transportation and Parking:

22. The Applicant shall implement, over the life of the Campus Plan, a Transportation Demand Management Plan, contained in Exhibit ____ to reduce and manage traffic and parking. Residing on the Campus will not qualify anyone for Residential Permit Parking decals from the District of Columbia. The TDM Plan will include periodic performance monitoring requirements. In the first monitoring report following the opening of the New Dormitory, the Applicant will conduct a traffic signal warrant analysis for the driveway to Massachusetts Avenue NW. If DDOT’s Traffic Engineering and Safety Division (TESD) determines a traffic signal or pedestrian beacon is warranted, the Applicant will design, fund, and install it.
23. **Prior to the issuance of the final residential Certificate of Occupancy for the New Dormitory**, the Applicant shall fund and install a 19-dock Capital Bikeshare Station with 12 bikes at a location to be determined in consultation with DDOT and fund one year of maintenance and operations costs for the Bikeshare station.
24. **Prior to the issuance of the final Certificate of Occupancy for the New Dormitory**, the Applicant will construct the following pedestrian improvements subject to any required public space and DC Department of Transportation (“DCDOT”) approvals:
 - A sidewalk along the east side of University Avenue NW between Massachusetts Avenue and Rodman Street with a leadwalk into campus along at least one side of the site driveway;
 - Install signage, a crosswalk, and ADA curb ramps on the south leg of University Avenue at the Rodman Street intersection;
 - Install signage, a crosswalk, and ADA curb ramps on the east leg of the campus driveway at the University Avenue and Sedgwick Street intersection or construct the crossing as a continuous sidewalk; and

- The Applicant, will undertake an effort to seek AU's approval for the reopening of the gated connection at the southeastern corner of the property that links AU and the Seminary. The Seminary will attempt to coordinate with AU on the installation of wayfinding signage on the campus directing students to the gated connection to the AU campus upon receiving AU's approval for the opening of the connection.
25. After occupancy of the New Dormitory, the Seminary will perform a traffic monitoring survey in accordance with the performance monitoring plan in Exhibit ____ annually for the first two (2) years and report the results to DDOT, ANC 3D, ANC 3E and the Community Liaison Committee. If warranted by the traffic survey, the Seminary will implement additional TDM measures and University Avenue access restrictions in consultation with DDOT, ANC 3D, ANC 3E, and the CLC. Annual traffic monitoring will be extended by DDOT until such time as the TDM and traffic mitigation goals have been met for two consecutive years.
 26. Vehicles will be able to enter and leave the Seminary through the Massachusetts Avenue entrance/exit. Vehicles exiting the Campus to Massachusetts Avenue will be Right Turn only. The Seminary will request DDOT to assess the feasibility, including potential traffic impacts of installing a traffic signal at the Massachusetts Avenue entrance/exit or allow left turn for exiting vehicles on a limited basis. Any studies or changes to access, including installation of traffic signal equipment, will be supplied, designed, funded and installed by the Applicant not DDOT.
 27. The Applicant agrees to limit use of the University Avenue driveway for entry by emergency and limited service and delivery vehicles (e.g., trash and food service deliveries to refectory) required to access the campus from this location.
 28. Use of University Avenue for exiting vehicles will be prohibited, except in emergencies or for limited service or delivery vehicles and appropriate physical enforcement measures will be implemented.
 29. The Applicant will encourage all Wesley students, on-campus residents, staff, faculty, and visitors to park on Campus with quarterly electronic communications and signage.
 30. If either ANC 3D or ANC 3E notify the Applicant that Wesley students or on-campus residents are parking on nearby restricted residential streets, the Applicant will undertake a continuing enforcement program until such time as the Applicant reaches agreement with the complaining ANC that the problem has been reasonably mitigated.
 31. The Applicant will undertake measures as needed to address additional parking demand including, the possibility of altering class schedules, as outlined in the Transportation Demand Management (TDM) Plan.
 32. The New Dormitory will include a designated on-campus ride-sharing pick-up and drop-off area generally located in front of the proposed dormitory, and on-campus rental bike and scooter parking area generally located near the future Capital Bikeshare Station as shown in Exhibit _____.

Construction Management:

33. All construction vehicles shall access the campus through the Massachusetts Avenue entrance. If exceptional conditions mandate use of University Avenue by construction vehicles (e.g., construction crane) to access the construction site, the only access will be from the existing exit to University Avenue with right turn only for exiting vehicles. No new access to the construction site will be created from University Avenue, except for the limited purpose and duration for the demolition of the Old President's House and planned restoration and landscaping of that area and installation of Community Playground.
34. The Applicant will develop with the participation of the community a construction management plan that: a.) designates a Seminary Point of Contact for construction activity issues; b.) establishes a 24-hour construction contractor point of contact; c.) notifies ANC's 3D and 3E and the Community Liaison Committee of a pre-construction community meeting to coordinate construction activities at least 90 days before construction; d.) provides for construction worker and construction vehicle parking at locations other than neighborhood streets; e.) minimizes on-street truck idling in compliance with all applicable regulations; f.) ensures trucks are brushed and loads are covered prior to leaving the construction site; and g.) ensures compliance with on-site environmental regulations for maintaining the construction site. The Applicant will be responsible for implementing the Construction Management Plan and serve as the primary point of contact for the community.
35. The Applicant will establish a neighborhood construction management committee 90 days prior to construction to discuss ongoing issues during the construction phase of the project and address remediation issues tied to any damage to neighbors' property during construction. Representatives appointed to the committee will include individuals from ANC 3D, ANC 3E, and the Community Liaison Committee.

Environmental Issues:

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

38. Throughout the term of the Campus Plan, the Applicant shall work directly with residents and the Community Liaison Committee to provide information to ensure that the construction does not have unanticipated stormwater impacts on residents' property and shall address any impacts should they occur. Residents will be consulted on a quarterly basis to ensure that unanticipated stormwater impacts are addressed.

Other Issues:

39. The Seminary shall maintain a Community Liaison Committee that meets at least three times annually and includes neighborhood resident representatives of ANC 3D, ANC 3E, the Spring Valley-Wesley Heights Citizens Association, Neighbors For A Livable Community, Spring Valley Neighborhood Association, and individual residents of Spring Valley living within 200 feet of the Seminary's property line at University Avenue. Other interested residents and neighborhood groups are invited to participate in the CLC's public meetings.
40. The Applicant shall make available (weekday evenings from 6:00 – 11:00 p.m.) for use by community groups without charge one or more meeting rooms on the campus designed to accommodate groups of various sizes including not more than 100 people and equipped to facilitate attendance both in person and by video conferencing, including a screen projector, guest Wi-Fi, but subject to the applicable IT security restrictions and available video conferencing resources. Such a meeting room shall be made available on a priority basis to any community group that requests the use of such room at least 21 days before the proposed meeting date if that room is not previously booked by another community group. If a community group requests a room with less than 21 days' notice or for a meeting on a weekend, the Applicant shall make the room available if it has not been previously booked by either another group or the Applicant. At the time use of a meeting room is reserved, the available HVAC, facilities and IT resources will be confirmed. When not so requested by a community group, any such meeting room may be used by the Applicant for other purposes. Persons attending these meetings will be provided with free parking in the surface parking lot. "Community group" is defined as any organized private civic or governmental group with members residing in the neighborhoods represented by ANC 3D and ANC 3E at the time of this order. Applicant reserves the right to exclude political and/or controversial groups in its reasonable discretion in keeping with its religious and educational mission. Unaccompanied minors are not permitted at any time.
41. At least twice annually, after final approval and beginning prior to occupancy of any new building, the Seminary will attend ANC 3D and ANC 3E meetings to review Campus Plan performance issues identified in collaboration with the CLC.
42. The Seminary will install screening for the three exhaust pipes on the 2014 Dorm and monitor and correct any excessive noise exceeding applicable standards in a residential zone.
43. The Seminary will not sell or lease any part of the Spring Valley Campus (excluding any units in the New Dormitory) to American University for university use during the term of this Campus Plan. Any proposed sale or lease of any part of the Campus (excluding units

in the New Dormitory) to AU will constitute a Modification with Hearing under Subtitle Z, §703 requiring a public hearing before the Zoning Commission.

44. The Applicant will file any proposed change in any of the conditions of this Campus Plan as a Modification with Hearing requiring a hearing pursuant to Subtitle Z, §704, unless ANC 3D and ANC 3E both agree that such modification can be filed as a Minor Modification or a Modification Without Hearing.
45. The Seminary agrees to continue to make best efforts to engage with American University on issues of potential collaboration which affect the operation of the Seminary's Campus Plan, and which also affect the impact of the application on the neighborhood.
46. The Applicant shall be responsible for the construction of the University Avenue sidewalk and ADA-compliant pedestrian ramps recommended in the District Department of Transportation's (DDOT's) report on this application.
47. The Applicant is required to comply fully with the provisions of the Human Rights Act of 1977, D.C. Law 2-38, as amended, and this Order is conditioned upon full compliance with those provisions. In accordance with the D.C. Human Rights Act of 1977, as amended, D.C. Official Code §2-1401.01 et seq., ("Act") the District of Columbia does not discriminate on the basis of actual or perceived: race, color, religion, national origin, sex, age, marital status, personal appearance, sexual orientation, gender identity or expression, familial status, family responsibilities, matriculation, political affiliation, genetic information, disability, source of income, or place of residence or business. Sexual harassment is a form of sex discrimination that is also prohibited by the Act. In addition, harassment based on any of the above protected categories is also prohibited by the Act. Discrimination in violation of the Act will not be tolerated. Violators will be subject to disciplinary action.
48. The Applicant shall file with the Zoning Administrator a letter identifying how it is in compliance with the conditions of this Order at such time as the Zoning Administrator requests and shall simultaneously file that letter with the Office of Zoning.
49. The Applicant shall have Campus Plan design flexibility in the following areas:
 - A. Number of Beds in the New Dormitory. To reduce the number of beds in the New Dormitory up to minus ten percent (10%).
 - B. Parking Configuration. To make refinements to the approved parking configuration, including layout, number of parking spaces plus or minus 10%, and/or other elements, and to vary the allocation of Wesley and Landmark parking spaces.
 - C. Interior Components. To vary the location and design of all interior components, including amenities, partitions, structural slabs, doors, hallways, columns,

stairways, mechanical rooms, elevators, escalators, kitchens and toilet rooms, provided that the variations do not change the exterior configuration of the building.

- D. Exterior Materials and Color. To vary the final selection of the exterior materials within the color ranges and material types as proposed on Sheet ____ of the Approved Plans (titled, “Material Palette”). In the event the Applicant desires to change the exterior materials, type or color beyond the parameters of the Material Palette, the Applicant shall file an application for a Modification of Consequence for the Commission’s approval of the change of exterior materials.
- E. Exterior Details. To make minor refinements to the locations and dimensions of exterior details that do not substantially alter the exterior design shown on the Approved Plans. Examples of exterior details would include, but are not limited to, doorways, canopies, railing, skylights, and window locations, and brick patterns or sizes.
- F. Sustainable Features. To vary the approved sustainable features of the New Dormitory, provided the total number of LEED points achievable for the project does not decrease below the minimum required for LEED Gold under LEED v.4 for Homes and Multi-Family Mid-Rise Residential for the New Dormitory.
- G. Signage. To vary the font, message, logo, location, and color of the proposed signage, provided that the maximum overall dimensions and signage materials do not change from those shown on the Approved Plans.

XI. CONCLUSION

The Campus Plan to Thrive in Place (Years 2025 through 2035) is the result of a careful analysis of Wesley Seminary’s long- and short-term needs to achieve its “Ministry 2044” vision and ongoing strategic planning in light of changing circumstances and needs and more limited resources. The Campus Plan is most notable for its stable enrollment, increased on-campus housing, increased off-street parking, and more limited expansion of the Campus density than allowed, which maintains the existing relationship and harmony with the adjacent residential neighborhood. Long before the filing of this application, Wesley has involved its neighbors in this process through correspondence, meetings and access to Campus Plan documents on its website. The Seminary will continue this collaborative process with its neighbors as this application moves forward.

CERTIFICATE OF SERVICE

I hereby certify that on April 11, 2025, the Wesley Theological Seminary Pre-Hearing Statement was filed in IZIS and delivered via electronic mail to the following:

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