



MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Maxine Brown-Roberts, Development Review Specialist
Jennifer Steingasser, Deputy Director, Development, Design and Preservation

DATE: May 5, 2025

SUBJECT: **ZC 23-08(1)** - Hearing Report for the Wesley Theological Seminary of The United Methodist Church Campus Plan to Thrive in Place, 2025-2035 at 4500 Massachusetts Avenue, N.W.

I. BACKGROUND

Wesley Theological Seminary of The United Methodist Church (Wesley, the Seminary or Applicant) submitted an application for its second campus plan, Zoning Commission 22-13, on March 17, 2022. The principal component of the campus plan was the construction of a new dormitory that proposed to house Wesley students with a significant portion of the building proposed to house students from the neighboring American University (AU). The proposal would also accommodate students with immediate families.

To accommodate this unique request, Wesley filed, and the Zoning Commission (ZC) held public hearings on the requested campus plan but did not take action because the issue of housing for students other than Wesley students was not resolved. Wesley then filed a request for a Campus Plan and Planned Unit Development (PUD) combination which was also not approved because the Zoning Commission concluded the application did not meet the standards for approval of a PUD and Wesley did not demonstrate how they would meet the Inclusionary Zoning (IZ) requirements triggered by housing students other than Wesley's. The processing of the campus plan was paused and Wesley then followed up with a text amendment which the ZC approved as case ZC 24-09 to allow Wesley to house non-Wesley students from AU on the Wesley Campus and provide off-site IZ units. These applications are expounded on in Section V of this report.

II. RECOMMENDATION

On March 5, 2025, Wesley requested to resume processing of the revised Wesley Theological Seminary of The United Methodist Church Campus Plan to Thrive in Place, 2025-2035 (the Campus Plan), pursuant to Subtitle X § 101.

The Office of Planning (OP) **recommends APPROVAL** of the Wesley Theological Seminary of The United Methodist Church Campus Plan to Thrive in Place, 2025-2035, and the area variance relief from the setback requirement of Subtitle F § 203.3 pursuant to Subtitle X § 1000.3 and Subtitle X § 1002.1.

OP also recommends that:

1. The Applicant clarify if persons residing or working on the Wesley campus will have access to the American University shuttle to and from the Tenleytown Metro station.
2. The Applicant work with the Department of Energy and Environment (DOEE) on their recommendations and options to provide measures that could move the campus closer towards operational carbon-neutrality.
3. Amend proposed Condition #15 to add solar panels as one of the items to be incorporated into the building.
4. Amend proposed Condition # 49, by deleting items D, E, F, and G which are more appropriately addressed at the time of Further Processing.
5. At Further Processing, the Applicant provide more detailed and documented information on their investigation of alternative means of meeting their IZ set-aside requirements.
6. At Further Processing, the Applicant should provide a mechanism by which a government agency can monitor the IZ units production.

III. APPLICATION-IN-BRIEF

Proposal	Wesley Theological Seminary of The United Methodist Church Campus Plan to Thrive in Place 2025-2035
Location	4500 Massachusetts Avenue, N.W.
Legal	Square 1600, Lots 6 (A&T Lots 818, 819), 7, 8 and 9
ANC	Ward 3, ANC-3E
Zoning	RA-1
Site	381,787 SF (8.77 acres)

The intent of the proposed campus plan is to enhance Wesley’s ability to continue providing Master’s and Doctoral-level education for graduate-level students studying theology and related subjects. The primary source of the funds to achieve this would be revenue from a ground lease enabling a private company to construct a new 216-unit, 659-bed dormitory that would be occupied primarily by American University students and their immediate families.

Under the new plan, the campus would remain a compact cluster of buildings, relatively well-screened from adjacent residential areas and with a publicly accessible green periphery on three sides. Two existing dormitories, the “President’s House” and a surface parking lot would be demolished to make way for the new construction and a neighborhood park. The proposed new construction would be a seven-story dormitory with underground parking, and a neighborhood playground, all of which would be reviewed at Further Processing. The cap on student enrollment and faculty and staff would remain the same, while traffic circulation would remain essentially the same as under the existing plan. There would also be enhancements to landscaping and support facilities.

IV. SITE AND SURROUNDINGS DESCRIPTION

Wesley has two campuses, leased space near Mount Vernon Square area, and the subject property at 4500 Massachusetts Avenue, N.W. which is the area covered by the proposal. It is in the northwest

area of Washington, just north and west of the intersection of Massachusetts and Nebraska Avenues at Wesley Circle. The 8.77-acre site is essentially diamond-shaped and bounded by the arterial Massachusetts Avenue on the northeast, The American University's main campus on the southeast and southwest, and University Avenue on the northwest side.

AU's high-rise dormitories and playing fields are adjacent to the southeastern and southwestern sides of the campus. There are single-family houses to the northeast, across and well set-back from Massachusetts Avenue. The more proximate residential area is a single-family detached neighborhood on the campus' northwestern side, down-hill and across University Avenue from the campus' existing and proposed building.

The principal objective of the 10-year plan is to maintain and enhance the programs and facilities for Wesley students by generating revenue from the leasing of a portion of the campus for a new dormitory for rental primarily by non-Wesley students. The Applicant's [Pre-hearing Statement](#) (Exhibit 82) contains 49 Draft Conditions summarizing the proposals, limits and permissions for which permission is sought under the proposed campus plan and is supported by OP except for a few areas of recommended amendments.

V. PRIOR APPLICATIONS

Wesley submitted an application for its second campus plan, Zoning Commission 22-13, on March 17, 2022. The principal component of the campus plan was the construction of a new dormitory the dormitory that would be built and operated by a private, non-Wesley entity, that would be house:

- students enrolled at Wesley and their immediate families; and
- non-Wesley students and their immediate families enrolled at one specific educational institution – American University (AU).

The proposal had a Zoning Commission public hearing and was extensively discussed, but the issue of housing American University students on the campus was not resolved. It was recommended that Wesley file an application for a PUD to address the issue. Pursuant to Subtitle Z § 600.3(d) the Zoning Commission granted a 90-day waiver and directed Wesley to withdraw ZC 22-13 and authorized that a PUD and the campus plan be heard together under cases ZC 23-08 and ZC 23-08(1) respectively. The Commission deferred taking action on the campus plan to allow Wesley time to file a PUD to address the issue of a dormitory operation and use.

In PUD application, ZC 23-08, Wesley purported that they needed relief to permit the dormitory to house American University students in order for them to meet their mission and obligation of providing theological education and serving District residents. Under the PUD regulations, accommodating American students on the campus required Wesley to meet all the Inclusionary Zoning (IZ) requirements of the PUD. To address their unique situation, Wesley outlined a process by which it requests special exception relief from some of the IZ requirement while providing an alternate mechanism to provide IZ beds. However, after two public hearings, the ZC did not find that the proposal would be consistent with the Comprehensive Plan, in particular the IZ requirements. Wesley then requested to file a text amendment to consider providing their IZ requirements off-site. The PUD was later withdrawn and the campus plan processing was suspended during the processing of the text amendment.

Wesley filed ZC 24-09 on May 30, 2024, a text amendment to Subtitle C, § 1006.6(c) and Subtitle X § 101. After several public hearings and meetings, the application was amended and the Commission took Final Action to amend Subtitle X § 101 by adding a new Subtitle X § 101.5, allowing Wesley to house their and American University students, faculty, and staff and that they not be subject to the commercial use restrictions of Subtitle X § 101.3, if approved as part of a campus plan.

New Subtitle X § 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.

The text amendment also created a new Subtitle C, § 1006.10 which would allow Wesley to comply with their IZ requirements off-site, within Ward 3. The demonstration of how the IZ requirement would be met is to be addressed at the time of further processing for the new dormitory. The new Subtitle C, § 1006.10 states:

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 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- 2035 Campus Plan further processing to construct university housing on Wesley's campus.

Wesley has submitted a full analysis and plans stating that they would meet the IZ requirement requirements of the new Subtitle C, § 1006.10 by providing 80 million dollars to a revolving fund to facilitate the creation of IZ units. Wesley states that they have enlisted Local Initiatives Support Corporation (“LISC”) to administer the funds. At this time, OP believes that Wesley should provide more details on the evaluation of alternate ways of meeting its off-site IZ requirements and create a mechanism by which an evaluation of the program could be provided to a District agency. OP will also evaluate the proposal at the time of Further Processing for the new dormitory.

Wesley, in their draft conditions requested design flexibility relating to Exterior Materials and Color, Exterior Details, Sustainable Features and Signage (Condition # 49, D, E, F, and G). **OP believes the granting flexibility in these areas would be premature and should be at the time of Further Processing when the design details of the proposed new dormitory would be evaluated.**

Proposed Condition #15 should be amended to include “Solar” as in its submission it was presented that solar panels would be provided.

VI. 2006 CAMPUS PLAN AND SUBSEQUENT APPROVALS

The first campus plan for the Wesley Theological Seminary of the United Methodist Church-Campus Plan (ZC 05-40), was approved and became effective on January 16, 2006 for a period of ten years with an expiry date of December 31, 2015. The Plan proposed an ambitious and aspirational vision for the campus development plan. The Plan was approved a student and faculty cap of 715 student and 110 faculty staff. The plan included the addition of up to 72,500 square feet of space slated for residential, academic, chapel and support uses to be added to the existing campus. – parking spaces and other conditions.

Due to a prolonged economic downturn, declining enrollment and changes in theological education, the University reevaluated the feasibility of implementing the proposed development of the approved campus plan. To provide a realistic plan which could meet the University's needs, the University filed for a new campus plan (ZC 05-40A). The new campus plan maintained the student and faculty cap at 715 students and 110 faculty. However, changes included the renovation of the chapel instead of expanding it and renovating the library instead of the planned demolition and reconstruction. The only construction proposed by the new campus plan was for a new three-story residence hall with 76 beds and lower-level central plant facilities; the renovation of two existing residential buildings, an increase in surface parking, and other campus enhancements.

Subsequent to the approval of the ZC 05-40A, the 2006-2015 campus plan, the following modifications have been approved.

Case #/Expiration Date	Modification and Further Processing
ZC 05-40B Expiry date: December 31, 2019	AU undergraduate students are allowed to occupy Straughn Hall for the 2016- 2017 academic year, occupy vacant beds in Straughn Hall in subsequent years, and amend the campus plan expiry date.
ZC 05-40C Effective: August 18, 2017	Minor modification to permit an increase in the amount of housing to be leased to AU graduate students for a limited time period.
ZC 05-40D Effective: September 4, 2020	Approval of an increase in the number of AU students housed on the Wesley campus and extend the validity of the campus plan to December 31, 2020.
ZC 05-40D(1) Expiry date :December 31, 2021	Administrative Covid-19 Six-Month Time Extension for all Campus Plan orders.

VII. EXISTING and PROPOSED CAMPUS PLAN

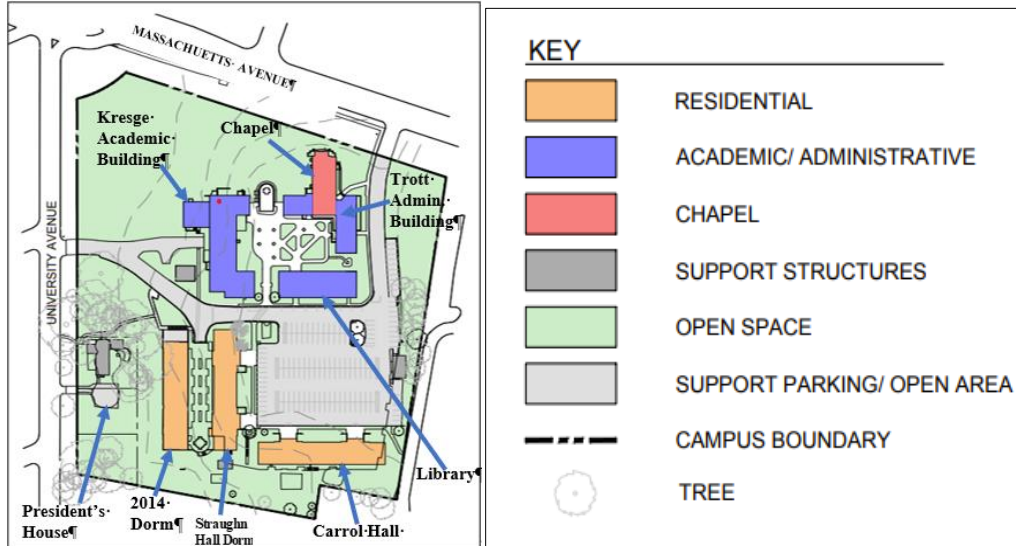
Existing Campus Plan

The current campus is within Square 1600 and consists of Lots 6 (A&T Lots 818 and 819), 7, 8 and 9. The campus has 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 buildings combine for a total of approximately 166,916 gross square feet of space. The topography of the campus rises up from both University Avenue and Massachusetts Avenue, towards the southeastern

portion of the site. The buildings, except for the President's House, are clustered on the higher elevation and thus are separated from the family homes across University Avenue ([Exhibit 76D](#)).

The built portions of existing campus comprises two back-to-back areas at the top of the hill and two buildings on the hill's slope. Towards Massachusetts Avenue is a quadrangle bordering a pedestrian courtyard. The quadrangle buildings are devoted to classroom, administrative, chapel and library uses and would all remain under the proposed plan. This area is landscaped and accessible only to pedestrians.

Figure 1 – Existing Campus Plan



To the west of the quadrangle, the three-story Carroll Hall and Straughn Hall dormitories form an inverted “L” bordering a 143-space surface parking lot. The back of the library also borders the parking lot.

On the slope of the hill facing University Avenue is the 2014 Dorm, located to the north of and behind Straughn Hall. This is the only building constructed under the existing campus plan and would remain under the proposed plan. While the 2014 Dorm starts from a lower elevation than Straughn Hall, its 4-story height brings it to approximately the same elevation as Straughn Hall. Further down the hill, towards University Avenue is the former President's House.

The campus has a total of 174 surface parking spaces; 143 spaces in the parking lot at the center of the campus and an additional 31 spaces along the interior roadways. Vehicular ingress and egress is provided to and from Massachusetts Avenue via a driveway while the driveway off University Avenue serves some delivery and service vehicles.

The buildings are set back at least 171 feet from University Avenue, which enables a significant landscaped buffer between the principal part of the campus and the single-household residences on the opposite side of University Avenue.

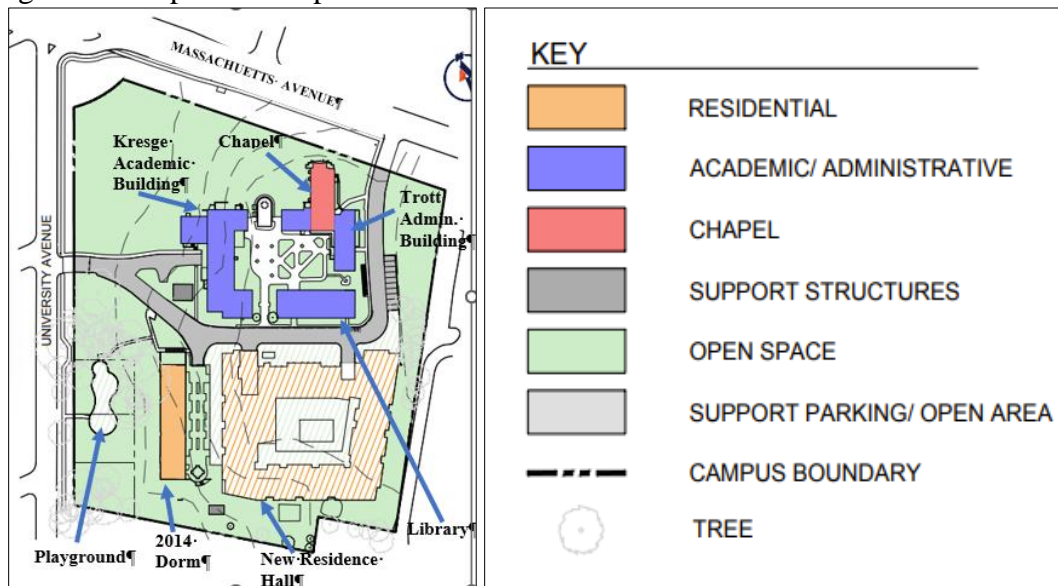
Proposed Campus Plan

The proposed campus plan seeks to ensure Wesley’s ability to continue providing Master’s and Doctorate education to theology students by developing revenue sources to:

- retain or enhance existing academic programs and enrollment;
- maintain the buildings that have been either recently constructed or renovated;
- provide for on-campus housing for Wesley students desiring it, as well as for their immediate families, if desired; and
- provide for the needs of American University students and Wesley faculty and staff.

To achieve the noted goals, Wesley proposes a number of physical changes to the campus plan, shown on Figure 2 below. The highlight of the campus plan would be the construction of a seven-story dormitory with an underground parking garage. The other change on the new campus plan would be the demolition of the former President’s House, along University Avenue, which would be replaced by a playground.

Figure 2 - Proposed Campus Plan



The table below shows the current and proposed changes to buildings on the campus:

Current and Proposed Development of Wesley Theological Seminary Campus					
Building	Use	Existing SF	Proposed SF	Existing Beds	Proposed Beds
Straughn Hall	Dormitory	29,866	To be demolished	~45	--
Carroll Hall	Dormitory	27,533	To be demolished	~ 45	--
Old President House	Storage	4,538	To be demolished	--	--
Library	Academic	16,630	16,630	--	--
Trott Hall / Chapel	Academic/ Religious	26,335	26,335	--	--
Kresge	Academic	32,819	32,819	--	--

Current and Proposed Development of Wesley Theological Seminary Campus					
2014 Dorm	Dormitory	29,195	29,195	76	76
Proposed New Dorm	Dormitory	--	282,061	--	659 (215 units)
Total Beds	--	--	--	166	735
Total SF	--	166,916	387,040	--	--
FAR (RA-1 permits 1.8)	--	0.44	1.014	--	--

Demolitions

Wesley proposes to demolish both Carroll Hall and Straughn Hall, which together houses 90 student beds. The demolition of these dormitories along with the adjacent 143 space parking lot would allow for the construction of the new dorm. Carroll Hall provides family-style units for married students and their families and would be captured in the new dormitory.

The Old President's House, located along University Avenue, is currently vacant and has not been used as a President's House for over 20 years. The building and associated paved parking area and University Avenue curb cut would be demolished and redeveloped with a community playground and enhanced green area along University Avenue.

New Dormitory

The proposed campus plan seeks to develop an enhanced revenue source in the form of a new student residence hall that would serve Wesley students, but that would be rented primarily by American University students. It is the intent of Wesley to lease (99 years) the land now occupied by Straughn and Carrol dormitories and the parking lot between them to Landmark Properties, a private company with experience in developing apartment-type student dormitories. Landmark would be responsible for demolishing the existing dorms and parking lot, construct and manage the dorm. The building would house the following:

Space	Approximately 282,061 square foot -
Height	74.6 feet high or 7 stories
Units	215 units or 659 beds
Unit types	Studio to five-bedrooms, co-living units
Parking	Two-level, below grade parking garage with 264 spaces. 105 of the spaces would be for Wesley's exclusive use and 31 on-street spaces.
Amenities	Study areas with group and individual spaces, a computer lounge, activity club room, and an outdoor interior courtyard.
Other	Loading, trash, maintenance facilities and storage.

Based on information provided by Wesley it appears that approximately 550 of the 659 beds in the new dorm would be rented to American University enrolled students and their immediate families.

In its original campus plan submission, Wesley had proposed a penthouse on the building. However, concerns were raised by neighbors along University Avenue that the building being on the upper portion of the property would be too tall and visible from their residences. Wesley has responded by eliminating the penthouse, as well as setting back the top levels of the building 27.5 to 32.5 feet from the University Avenue face of the building and the wall facing University Avenue would be windowless.

The new dormitory building would be LEED-Gold mid-rise residential standard and would have green roof and solar panels. Wesley has provided a significant amount of architectural details on the design and layout of the proposed dormitory which are more appropriate for review at the Further Processing stage of the campus plan review and so this report does not evaluate the design at this time. OP does not object to the proposal.

2014 Dormitory

The dormitory to the north of Straughan Hall was built in 2014 under the current campus plan and will remain. The current campus plan (ZC 05-40B) allows some American University graduate students to live in the building. Under the proposed plan it would be occupied only by Wesley students and their immediate families. In addition to the improvements in facilities, the University is proposing improvements to enhance the overall campus environment, open spaces, traffic and historic preservation.

Landscaping, Open space and Buffer

OP is supportive of the University's commitment to retain up to 53% of the campus undeveloped and landscaped. The existing landscaped buffer along Massachusetts Avenue and the over 200-foot-deep buffer at the corner of Massachusetts Avenue and University Avenue would be retained. Wesley has identified 76 special trees and 27 heritage trees on the campus all of which would be retained. With the proposed demolition of the two dormitories and the parking lot to make way for the new residence hall, some trees would be removed. Landscaping around the proposed residence hall, [Exhibit 82E](#), would be provided to screen the building and will be further assessed at the time of further processing.

The current 171-foot buffer along University Avenue would be altered by the demolition of the existing President's House in favor of a neighborhood playground. New plantings would be introduced along the driveway off University Avenue and around the new playground. The new plantings would complement the existing vegetation and would consist of a mix of shade trees, ornamental trees, evergreen trees, deciduous shrubs and evergreen shrubs. Plantings along the driveway would further enhance the entrance road and hide utility boxes. Significant additional plantings along University Avenue would be planted to create privacy and enclosed the playground and are shown on the landscaping plans at [Exhibit 82E](#) and [Exhibit 84](#).

The existing open space and landscaping enhancements would create a more substantial and durable buffer to the neighborhood, especially along University Avenue. The existing 2014 Residence Hall is located 171 feet from University Avenue and is approximately 205 feet for the residences across University Avenue. The new dormitory would be located even further from University Avenue, approximately 300 feet from of University Avenue and approximately 660 feet to be nearest residential properties along Sedgwick Street, N.W. to the north. The new dorm would be adjacent to AU dorms and playfields would be setback a minimum 35 feet from the AU boundary. The distance, other buildings and vegetation would provide some visual buffering of the new dormitory from existing neighborhood residences.

Community Amenities

Wesley currently gives the community open access to the campus and its extensively landscaped grounds and that would be maintained. They would also continue to hold services, talks, and small

concerts on the campus which are open to the public. Wesley has also offered to provide space and finance “Sledding Hill”, as a new neighborhood serving project on the campus.

As part of this campus plan, Wesley has offered a playground for community use on the three small lots fronting on University Avenue. The playground would be setback back approximately forty feet from University Avenue and would have an area of 3,800 square feet with a natural double shredded hardwood mulch safety surface. The playground would include benches and play equipment suitable for toddlers and young children and would be enclosed by a 48 inch tall, vinyl-coated, chain link fence. Access would be via an entry path from the sidewalk along University Avenue. The playground would be open only during daylight hours and therefore no lights would be provided. [Exhibit 84](#)

As a community amenity, Wesley has also committed to provide, at its expense, the following sidewalk and public space improvements along University Avenue:

- A sidewalk along the east side of University Avenue NW between Massachusetts Avenue and Rodman Street, subject to DDOT approval, with a lead walk 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 campus directing students to the gated connection to the American University campus.

Sustainability

The campus has been upgrading its infrastructure to improve its sustainable performance during the existing campus plan. The development of the new dormitory would allow for further improvements to campus sustainability with improvements to stormwater measures and enhanced open space throughout the campus, including preservation of heritage trees. The new dormitory would be built to LEED Gold Standards achieved through a combination of energy and water conservation methods in addition to approximately 2,800 square feet of solar panels and also green roofs. The campus is projected to have a GAR score of 0.6 which exceeds the 0.4 minimum. Wesley states that their desire to provide a net zero building is tempered by cost, space limitations and integration challenges.

The campus sustainability will be further assessed at the time of further processing. OP and Department of Energy and Environment (DOEE) encourages Wesley to continue to explore ways to move the environmental performance of the campus to closer to carbon-neutrality as part of longer-range sustainability goals. The campus plan was reviewed by the Department of Energy and Environment (DOEE) and their comments are at Attachment I.

Transportation, Circulation and Loading

The vehicular circulation system would remain essentially the same as under the current plan, but with additional restrictions on use of the University Avenue access point. While delivery and

maintenance vehicles would enter and exit from University Avenue and would be restricted from left turns upon exiting, the proposed plan would restrict all such access or exiting during morning and evening peak traffic hours. Other vehicles (such as private vehicles, ride-share, etc.) would enter and exit from Massachusetts Avenue, as under the current plan. Wesley states that loading requirements would be met and the operation of the loading facilities have been planned to minimize noise spillage into the nearby neighborhood.

In addition to the 295 parking spaces, and long and short term bicycle spaces on the campus, the use of public transportation is encouraged and the campus is well served by public transportation with the Tenleytown Metrorail station located approximately half-mile to the east of the campus. The Campus is also served by the N3, N4, N6, and N8 Metrobus routes along Massachusetts Avenue, and the N2 and M4 Metrobus routes along nearby Nebraska Avenue, NW. AU offers a shuttle bus service to the station. **However, Wesley should clarify if the AU Tenleytown Metro shuttle bus would be available for use by Wesley campus residents and employees.**

Below is a summary of Wesley's proposed transportation draft Conditions 22-32 to be provided:

- Fund and install a 19-dock Capital Bikeshare Station with 12 bikes at a location to be yet determined and fund one year of maintenance and operations costs for the station;
- Construct the pedestrian improvements including a sidewalks, ADA curb ramps, a cross walk, signage, and seek AU's approval for the reopening of the gated connection at the southeastern corner of the property that links AU and the Seminary and include wayfinding signage;
- Conduct an annual traffic monitoring survey.
- Assess the feasibility of installing a traffic signal at the Massachusetts Avenue entrance/exit which if needed would be supplied, designed, funded and installed by Wesley;
- Limit the use of the University Avenue driveway to entry by emergency and limited service and delivery vehicles through the use of physical enforcement measures; and
- Encourage Wesley students, on-campus residents, staff, faculty, and visitors to park on Campus with quarterly electronic communications and signage.

DDOT will provide a detailed analysis of recommendations for the traffic, parking, and circulation impacts as well as the TDM measures submitted with the campus plan. **OP is supportive of the measures to improve vehicular and pedestrian circulation around and through the campus and reduce parking demand and parking on neighborhood streets.**

VIII. CAMPUS PLAN REVIEW STANDARDS

Subtitle X § 101 of the Zoning Regulation outlines the standards for reviewing campus plans. The analysis of the campus plan elements and projects against these criteria are discussed below. Unless specified, the analysis refers to the entire campus and addresses specific impacts of certain project features.

101 CAMPUS PLANS

101.1 Education use by a college or university shall be permitted as a special exception subject to review and approval by the Zoning Commission under Subtitle X,

Chapter 9 after its determination that the use meets the applicable standards and conditions of this chapter.

101.2 The uses shall be located so that they are not likely to become objectionable to neighboring property because of noise, traffic, parking, number of students, or other objectionable conditions.

Noise

The major campus buildings are concentrated at the top of the hill in the southern section of the campus and is the farthest from the residential neighborhood and closest to the AU campus. The proposed new dormitory would be the farthest building from private houses, approximately 300 feet from University Avenue. Wesley states that loading facilities and operations systems would be designed internally to the new building and the campus to minimize noise. While the proposed new dormitory would have extensive communal facilities and amenities these would be located inside the building or inside a courtyard enclosed on all sides by the 75-foot building. These facilities should not result in a significant generation of noise outside of the building.

Wesley does not have many of the facilities or sponsor many of the activities that typically generate significant noise on other university campuses. There are no playing fields, amphitheaters, or field houses with their attendant lights, loudspeakers or scoreboards and Wesley does not sponsor athletic teams. The largest assembly hall is the chapel.

There is a possibility that noise may emanate from the proposed neighborhood playground Wesley would provide along its University Avenue frontage and across from residences on the opposite side of University Avenue. Sounds from the playground should be tempered by the extensive vegetation surrounding the playground and it would only be open during daylight hours.

Traffic and Parking

The Wesley campus is located along Massachusetts Avenue, a major arterial and University Avenue functions as a local two-way street with two travel lanes.

The campus is well served by public transit, including busses along Massachusetts Avenue and busses along nearby Nebraska Avenue that also serve the Tenleytown Metro station. It seems that the AU shuttle system, which connects with the Metro, also serves the Wesley campus, but OP has asked the applicant to clarify this. A Capital Bikeshare station is located on the campus and there are multiple stations on the AU campus or adjacent streets. With respect to pedestrians, the campus is self-contained and has an internal pedestrian circulation system.

In the existing campus plan, there are a total of 174 surface parking spaces, with 143 in a surface lot and 31 on internal campus streets. The proposed campus plan would increase the number of spaces to 264 spaces below the new dormitory, while retaining the existing 31 spaces along the roadways on the campus.

The review of the proposed Transportation Demand Management Plan elements are summarized in Section VII above, and DDOT will submit a separate report.

Number of Students, Faculty & Staff

Student enrollment at Wesley has fluctuated over the years and it is believed that 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 does not plan to expand the student enrollment cap of 715 established by the current Campus Plan. However, ZR16 amended the 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.

The number of 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) would be employed to manage and operate the New Dormitory, but excluding any student resident assistants/community ambassadors living in the student residential building.

Student Housing

The current and projected number of beds on the Wesley campus are as follows:

Dormitory	Existing 2025	Projected 2035
Straughn Hall	45	0 - demolished
Carroll Hall	45	0 - demolished
2014 Dorm	76	76
New Dormitory (219 apartment units)	0	659
Total	166	735

Of the existing beds on campus, 76 are currently permitted to be occupied by graduate students not enrolled at Wesley, provided no Wesley student is denied a bed to accommodate a non-Wesley student. While the existing campus plan contains an upper limit on the number of beds that can be rented to AU graduate students, the new plan does not propose a cap on the rental of beds to AU students or their immediate families. Under the proposed campus plan, Wesley proposes that any of the beds in the 659-bed dorm be occupied by students and immediate families from either Wesley or AU provided no Wesley student is denied a bed to accommodate an AU student or immediate family member. The 76 beds at the existing 2014 Dorm would be reserved for only Wesley students or their immediate families.

Under the proposed campus plan, the majority of Wesley's students are projected to not reside on campus while the majority of those residing on campus are projected to not be enrolled as Wesley students.

Other Objectionable Conditions

Lighting and Views

The campus would not have the type of high-intensity exterior lighting that often accompanies athletic facilities or performance venues. Light spillage should be limited to sources such as the interior lighting of dormitory and academic buildings and security lighting. The primary generators would likely be the existing 2014 Dorm and the New Dorm. However, on the New Dorm, Wesley eliminated the penthouse, setback the upper floors of the building and oriented the units in the upper floors so that no windows would be on the façade facing University Avenue to minimize visible light from the residents across University Avenue. Final plans for the design of the proposed new building would be considered under Further Processing.

As indicted in the photos in the case file, the campus is relatively visible from the north during winter months and is relatively well screened during months when there is foliage on the trees. The plans indicate the Wesley would plant more trees and considerably more vegetation, which should help to screen even the taller new construction in warm-weather months.

101.3 Any commercial use customarily incidental to a university use in an R, RF, or RA zone, or as an adjunct use to a university building, shall be subject to the following conditions:

(a) There shall be a demonstrated and necessary relationship between the use and the university functions; .

101.4 The campus plan process shall not serve as a process to create general commercial activities or developments unrelated to the educational mission of the applicant or that would be inconsistent with the Comprehensive Plan.

Throughout the campus plan process and its predecessor application, ZC 22-13, there was a debate as to whether the proposed dormitory use is a permitted use directly related to Wesley’s educational mission under Subtitle X, § 101.4 or a commercial use restricted under Subtitle X, § 101.3.

In ZC 24-09, the Commission affirmed that this is an unique situation in which Wesley is housing AU students on its campus in order to meet its educational mission. To accommodate Wesley’s unique situation the Commission approved a text amendment which created a new Subtitle X § 101.5¹ that states:

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.

This new Subtitle X, § 101.5 would make Subtitle X, §§ 101.3 and 101.4 not applicable to Wesley. Wesley does not propose any new development on the campus that would not be in support of its educational mission.

101.5 The maximum height and the maximum total floor of all buildings and structures on the campus shall be as set forth in the following table:

TABLE X § 101.5: MAXIMUM HEIGHT AND TOTAL FLOOR AREA RATIO

¹ At the time of this report, the Final Order for ZC 24-09 which would create a new Subtitle X § 101.5 and renumber the later subsections has not been published.

OF ALL BUI OF ALL BUILDINGS AND STRUCTURES		
Zone	Maximum Height Feet	Maximum Floor Area Ratio
R and RF	50	1.8
RA-1	50	1.8
RA-2	60	1.8
RA-3, RA-4 and RA-5	90	3.5

The Regulations limit height in the RA-1 zone to 50 feet, but Subtitle F § 203.7 allows for institutional buildings to have a height of up to 90 feet

- 207.6 In any of the RA-1, RA-2, or R-3 zones, an institutional building or structure may be erected to a height not exceeding ninety feet (90 ft.) with no limit on number of stories, not including a 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 zone in which it is located.*

The proposed dorm would have a height of 74.66 feet and so would meet the requirement. Further, the building is required to be setback from each property line a foot for every foot of height beyond 50 feet resulting in a building setback a minimum of 35 feet. Wesley has requested relief from this requirement for a small portion of the building which only has a setback of 27 feet. The requested relief is addressed in Section IX of this report.

The proposed 1.014 FAR level of total development under the proposed campus plan is within the 1.8 maximum.

- 101.6 Because of permissive increases as applicable to normal bulk requirements in the low-density zones regulated by this title, to address this standard it is the intent of this subsection to prevent unreasonable campus expansion into improved low-density zones.*

The campus plan retains the campus boundaries that have existed since 1958. There would be no expansion into a low-density residential zone.

- 101.7 In calculating floor area ratio (FAR), the land area shall not include public streets and alleys, but may include interior private streets and alleys within the campus boundaries.*

There are no public streets or alleys within the campus' boundaries.

- 101.8 As a prerequisite to requesting a further processing for each college or university use, the applicant shall have submitted to the Zoning Commission for its approval a plan for developing the campus as a whole, showing the location, height, and bulk, where appropriate, of all present and proposed improvements including, but not limited to, the following:*

- (a) Buildings and parking and loading facilities;*
- (b) Screening, signs, streets, and public utility facilities;*
- (c) Athletic and other recreational facilities; and*

(d) A description of all activities conducted or to be conducted on the campus, and of the capacity of all present and proposed campus development.

The proposed campus plan provides an inventory of all campus buildings and shows the location of parking facilities, the use of all buildings and the capacity of all existing and new developments. The existing campus plan, the buildings to be demolished and the proposed dormitory are shown on the table in the preceding Section VII of this report.

101.9 The further processing of specific buildings, structures, and uses within an approved campus plan shall . . .

This is not applicable at this time, as further processing for the proposed new buildings is not part of this application.

101.10 Within a reasonable distance of the college or university campus, and subject to compliance with Subtitle X § 101.2, the Zoning Commission may also permit the interim use of land or improved property with any use that the Zoning Commission may determine is a proper college or university function. The land need not be included in the campus plan. When a major new building that has been proposed in a campus plan is instead moved off-campus, the previously designated site shall not be designated for, or devoted to, a different major new building unless the Zoning Commission has approved an amendment to the campus plan applicable to the site; provided, that for this purpose a major new building is defined as one specifically identified in the campus plan.

No new temporary uses are proposed to be located off site at this time.

101.11 In reviewing and deciding a campus plan application or new building construction pursuant to a campus plan, the Zoning Commission shall consider, to the extent they are relevant, the policies of the District Elements of the Comprehensive Plan.

Generally, the proposed campus plan is not inconsistent with the Comprehensive Plan. The relevant policies of the Comprehensive Plan Citywide Elements and the Rock Creek West Area Elements are addressed in Section X of this report.

101.12 Is an integral part of the application requesting approval of new building construction pursuant to a campus plan, the college or university shall certify and document that the proposed building or amendment is within the FAR limit for the campus as a whole, based upon the computation included in the most recently approved campus plan and the FARs of any other buildings constructed or demolished since the campus plan was approved.

The maximum density proposed in this campus plan is 1.014 FAR, which is less than the 1.8 FAR permitted in the Regulations.

101.13 Pursuant to Subtitle Z § 405.1, as soon as the application is accepted, the Office of Zoning shall refer the application to the Office of Planning, the Department of Transportation, and the Department of Energy and Environment for review and written reports.

DDOT will submit a separate report. Comments from the DOEE are attached at Attachment I.

101.14 Approval of a campus plan shall be based on the determination by the Zoning Commission that the application will be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps, and will not tend to affect adversely the use of neighboring property, in accordance with the Zoning Regulations and Zoning Maps, subject to the special conditions specified in this section.

The proposed campus plan would meet the intent of the campus plan regulations as outlined at Subtitle X § 100.2. The new facilities would be for the long term. The campus plan is designed to minimize the impacts of noise and traffic on the adjacent residential uses and would be well buffered from the neighborhood. Wesley, through the community liaison committee would continue to meet with the ANC, community organizations and neighbors to provide information, allow input and transparency and get feedback on campus activities. This campus plan should not become objectionable to the surrounding neighborhood.

101.15 Small deviations from plans approved under further processing . . .

This is not applicable at this time.

101.16 A further processing of a campus building shall not be filed simultaneously with a full campus plan application. However, an amendment to an approved campus plan may be considered simultaneously with the further processing if determined necessary by the Zoning Commission.

Further Processing is not requested at this time.

The 8-foot reduction in the setback requirement on this small portion of the property would not be detrimental to the public good as it is adjacent to a portion of the AU property that is undeveloped and the reduced setback should not affect the light and air to any buildings on AU or any other residential use in the neighborhood.

No Substantial Impairment to the intent, purpose, and integrity of the zone

The intent of the RA-1 zone as it relates to non-residential use is stated at Subtitle F 101.2:

- (d) *Allow limited non-residential uses that are compatible with adjoining residential uses;*
- (e) *Encourage compatibility between the location of new buildings or construction and the existing neighborhood; and*

The purpose of the RA-1 zone as it related to institutional uses is stated at Subtitle F 101.3:

- (b) *Permit the construction of those institutional and semi-public buildings that would be compatible with adjoining residential uses and that are excluded from the more restrictive residential zones.*

The proposed reduction in the setback of a small portion of the dormitory would meet the intent and purpose of the RA-1 zone as the building would be compatible in height to the dormitories on the adjacent AU campus and would be located a significant distance from the residences across University Avenue and Massachusetts Avenue.

OP therefore recommends approval of the requested variance.

X. PLANNING CONTEXT

A. Comprehensive Plan Maps

Generalized Future Land Use Map (FLUM)



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. 227.18

The FLUM designation is Institutional use, similar to the American University's designation to the south and the east. Low density residential is to the northwest and northeast. The institutional use would be a campus of higher learning and the proposed additions would continue to be university uses in addition to community amenities.

Generalized Policy Map (GPM)



Institutional Uses: Much of the land identified as institutional on them a 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 building so facilities added. Policies in the Land Use and the Educational Facilities Elements address the compatibility of such uses with surrounding neighborhoods.

The Generalized Policy Map designation is for Institutional Uses. The proposed campus plan and the new dormitory would be entirely within the boundaries of Wesley’s existing institutional campus.

B. The Campus Plan in Relation to the Comprehensive Plan, As Viewed Through a Racial Equity Lens

The Comprehensive Plan recognizes that advancing equity requires a multifaceted policy approach and that many areas of policy must be brought to bear on the challenge:

Equitable development is a participatory approach for meeting the needs of underserved communities through policies, programs and/or practices that reduce and ultimately eliminate disparities while fostering places that are healthy and vibrant. Equitable development holistically considers land-use, transportation, housing, environmental, and cultural conditions, and creates access to education, services, health care, technology, workforce development, and employment opportunities. As the District grows and changes, it must do so in a way that encourages choice, not displacement, and builds the capacity of vulnerable, marginalized, and low-income communities to fully and substantively participate in decision-making processes and share in the benefits of the growth, while not unduly bearing its negative impacts. 213.7

The Implementation Element calls for “the Zoning Commission to evaluate all actions through a racial equity lens as part of its Comprehensive Plan consistency analysis”^{2501.8}. Achieving equity and more specifically racial equity requires a broad range of policies and tools, some of which fall under the zoning authorities granted to the Zoning Commission and some of which do not. Zoning Commission actions are land use focused, but the broader equity goal includes public policies, budget investments, civic improvements and social services which are beyond the scope of the Zoning Commission.

The direction to consider equity “as part of its Comprehensive Plan consistency analysis” indicates that the equity analysis is intended to be based on the policies of the Comprehensive Plan and part of the Commission’s consideration of whether a proposed zoning action is “not inconsistent” with

the Comprehensive Plan, rather than a separate determination about a zoning action's equitable impact.

The scope of evaluation of "all actions through a racial equity lens" varies depending on the type of zoning action before the Commission and what aspects of the outcome the Zoning Commission can control. Equity is conveyed throughout the Comprehensive Plan, particularly in the context of zoning, where certain priorities stand out. These include affordable housing, displacement, and access to opportunity.

A campus plan is a land use plan and its approval is required when institutional use is proposed in residential zones. On balance this proposed campus plan is not inconsistent with the Comprehensive Plan as analyzed through a racial equity lens. The site was essentially undeveloped when purchased by the Seminary in the middle of the last century. At that time its most recent use had been as an experimental station and testing ground for the U.S. Army. The development of the vacant land for seminary use occurred in 1958-59 and did not involve any displacement of residents.

The proposed campus plan would provide housing to Wesley and AU students and their immediate families. It would also provide employment opportunities to District residents, although not necessarily those currently residing in Rock Creek West.

Approximately 34% of the Seminary's students are Black. 18% of the administration, 25% of the faculty, and 7% of other staff are Black – the second largest racial or ethnic group in the Rock Creek West planning area. To the extent that current and project Wesley and AU students and their immediate families are or would reside in the District, the proposed expansion of graduate student housing could help to free up residential units in the broader neighborhood.

This should help to marginally relieve demand on the District's housing supply. While this may have some positive impact on housing affordability for members of racial and ethnic minority groups, given the demographic profile of the Rock Creek West Planning Area, and the composition of the Wesley student body, faculty and other employees, white people are likely to benefit more than any other racial or ethnic group.

However, the revenues Wesley would gain from the new dormitory are projected to stabilize the university's financial future. Given the careers led by Seminary graduates and the outreach the Wesley engages in within the District, the retention of the seminary may also contribute to racial equity. While some of the student body pursue academic careers, most are trained for careers in service to others. In addition to becoming pastors at congregations such as Shiloh Baptist and Metropolitan Baptist, Ebenezer A.M.E., Foundry Methodist and others, seminary graduates serve as leaders in a range of non-profit organizations. The seminary actively engages its graduates in virtual and in-person training to advance community engagement skills and provides real time assistance to events promoting racial and social justice. It also runs an internship program placing Wesley and other theological students as interns in churches throughout the District.

RACIAL EQUITY TOOL PART 1 – COMPREHENSIVE PLAN GUIDANCE

Equity is conveyed throughout the Comprehensive Plan, particularly in the context of zoning, where the provision of affordable housing, avoiding displacement of existing residents, and creating access to opportunity is a priority. The Commission's Racial Equity Tool outlines information to assist in its evaluation of zoning actions through a racial equity lens. The required information is provided below in relation to the campus plan.

The clearest impact of the proposed campus plan when viewed through a racial equity lens is the relative lack of any impact. The proposed campus plan would clearly not result in physical displacement of residents as the site does not currently include residential use. The most positive impact may be the continuation of Wesley's seminary as a viable institution. The racially diverse composition of its graduates, student body and employees has been noted elsewhere in this report. The density gained in increased dormitory/residential use on the site has provided Wesley with an opportunity to provide affordable housing off-site but within Ward 3, affordable housing for Wesley and AU students, and could potentially free up other rental housing for non-student populations.

Below are Comprehensive Plan policies, including ones related to racial equity, that would potentially be advanced by approval of the zoning action:

CITYWIDE ELEMENTS

Chapter 3, Land Use Element

Policy LU-2.2.4: Neighborhood Beautification

Neighborhood Beautification Encourage projects that improve the visual quality of neighborhoods, including landscaping and tree planting, facade improvement, anti-litter campaigns, graffiti removal, murals, improvement or removal of abandoned buildings, street and sidewalk repair, park improvements, and public realm enhancements and activations. 311.5

Policy LU-2.3.5: Institutional Uses

Recognize the importance of institutional uses, such as private schools, childcare facilities, hospitals, churches, and similar uses, to the economy, character, history, livability, and future of Washington, DC and its residents. Ensure that when such uses are permitted in residential neighborhoods, their design and operation is sensitive to neighborhood issues and neighbors' quality of life. Encourage institutions and neighborhoods to work proactively to address issues, such as transportation and parking, hours of operation, outside use of facilities, and facility expansion. 312.7

Policy LU-3.3.1: Transportation Impacts of Institutional Uses

Support ongoing efforts by institutions to mitigate their traffic and parking impacts by promoting ridesharing, carpooling, public transportation, shuttle service and bicycling; providing on-site parking; and undertaking other transportation demand management measures. 317.7

Policy LU-3.3.3: Nonprofits, Private Schools and Service Organizations

Plan, design, and manage large nonprofits, service organizations, private schools, seminaries, colleges and universities, and other institutional uses that occupy large sites within residential areas in a way that minimizes objectionable impacts on adjacent communities. Expansion of these areas should not be permitted if the quality of life in adjacent residential areas is significantly adversely impacted. 317.9

The campus plan includes measures to minimize potentially objectionable impacts on the adjacent community. Foremost is the enhanced landscape buffering along the campus perimeter, clustering

new housing as far away from the residential neighborhood as possible, and provide a neighborhood-oriented playground adjacent to University Avenue.

During this and other proceedings related to the campus plan, Wesley has worked proactively with the neighboring residential community and the ANC particularly around the issue of Wesley's housing a significant number of AU students in the proposed dormitory. Wesley has responded by reducing the height initially proposed for the new dormitory and providing additional setbacks for its upper stories to minimize any potential light-spillage issues.

The Land Use element encourages universities to provide alternative transportation options to mitigate traffic and parking impacts. The proposed measures are included in the transportation study to be reviewed by DDOT and evaluated in its report. The proposed campus plan would be not inconsistent with the Land Use Elements.

Chapter 4, Transportation Element

Policy T-1.1.8: Minimize Off-Street Parking

An increase in vehicle parking has been shown to add vehicle trips to the transportation network. In light of this, excessive off-street vehicle parking should be discouraged. 403.14

Policy T-5.2.2: Charging Infrastructure

Encourage early deployment of EV charging stations at no charge in appropriate, publicly accessible locations across the District to serve existing neighborhoods. Consider the integration of EV charging stations in new and existing residential and commercial developments. Consideration should also be given to locations where EV charging stations can be retrofitted into parking garages. As EVs become more popular, there will be increased demand for on-street charging stations, which will need to be balanced with other curbside needs and uses. 430.4

The proposed campus plan is not inconsistent with the Transportation Element of the Comprehensive Plan. The plan's transportation improvements promote bicycle, pedestrian, and, seemingly, shuttle bus usage. The plan enhances pedestrian pathways and adds long-term and short-term bicycle parking on camps and would provide will provide six to eight 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.

Wesley would provide adequate parking on campus. The plan proposes to increase on-campus parking, although providing it at a decreased student-bed to parking-space ratio than it does now. Simultaneously, by de-bundling parking from dorm-room rental, by prohibiting student, faculty and employee parking on residential streets, and by encouraging the use of mass transportation and other alternatives to private vehicles, traffic impacts on the adjacent neighborhood should be minimized.

Chapter 5, Housing Element

Policy H-1.3.5: Student Housing

Require colleges and universities to address the housing needs of their students and promote the use of such housing by their students. 505.12

The proposed dormitory, serving students and their families, would have a variety of unit sizes to accommodate one to five beds. The building would also have family sized units to accommodate students with their immediate families. The proposed dormitory would serve the need of both Wesley and AU students.

Chapter 6, Environmental Protection Element

Policy E-2.1.2 Trees Requirements in New Developments

Use planning, zoning, and building regulations to promote tree retention and planting, as well as the removal and replacement of dying trees when new development occurs. Tree planting and landscaping required as a condition of permit approval should include provisions for ongoing maintenance. 605.6

Policy E-3.2.1: Support for Green Building

Encourage the use of green building methods in new construction and rehabilitation projects and develop green building methods for operation and maintenance activities. 614.2

The proposed campus plan would not be inconsistent with the Environmental Protection Element of the Comprehensive Plan. The school's well-maintained and wooded environment is a defining feature of the campus' character with 53% of the campus remaining as open space. Additional trees and other vegetation would be planted under the new plan. Additionally, what is now a surface parking lot would be replaced by a new building that would be LEED Gold mid-rise residential. The new building would also include solar panels and a green roof. Other environmental elements encouraged by DOEE on the new dormitory could be incorporated and would be evaluated at the time of further processing.

The proposed building would not generate any emissions not typical to residential facilities or small offices. The proposed development on the property would be required to demonstrate compliance with the Green Building Act, meet current DOEE standards, and provide stormwater management to current requirements.

When viewed through a racial equity lens, the proposed campus plan is likely to have a neutral impact from an environmental standpoint. OP is not aware of the existing campus' having any negative environmental justice impacts and, with the planned certification at LEED Gold, the new building is not likely to have new negative impacts.

Chapter 7, Economic Development Element

Policy ED-1.1.1: Core Industries

Continue to support and grow the District's core industries, particularly the federal government; professional, scientific and technical services; religious, grantmaking, civic professional, and similar organizations; postsecondary education; accommodation and food services; health care and social assistance; and administrative support services. 703.12

Policy ED-2.4.1: Institutional Growth

Support growth in the higher education and health care sectors. Recognize the potential of these institutions to provide employment and income opportunities for District residents, and to enhance the District's array of cultural amenities and health care options. 710.4

The revenues developed under the proposed campus plan would allow Wesley to remain open and continue providing employment and other opportunities to District residents. The revenues from new dormitory would help to keep Wesley financially solvent and able to continue its educational and outreach programs. The proposed campus plan is therefore not inconsistent with the Economic Development Element of the Comprehensive Plan.

Chapter 8, Parks, Recreation and Open Space Element

Policy PROS-4.2.1: Institutional Open Space

Encourage local institutions—such as private and parochial schools, colleges and universities, seminaries, hospitals, and churches and cemeteries—to allow the cooperative use of their open space lands for the benefit of District residents. Explore funding and insurance mechanisms that would incentivize and preserve local institutions that choose to provide cooperative use. Ensure that cooperative uses recognize and respect institution missions and operations. 818.3

With a new playground accessible to the nearby neighborhood and the preservation of 53% of the campus as green, open space, the campus plan would be not inconsistent with this element.

Chapter 12, Educational Facilities Element

Policy EDU-3.2.2: Corporate Citizenship

Support continued corporate citizenship among Washington, DC's large institutions, including its colleges, universities, hospitals, private schools, and nonprofits. This should include a continued commitment to high quality architecture and design on local campuses, expanded use of green building methods and low impact development, and the adaptive reuse and preservation of historic buildings. 1213.3

Policy EDU-3.2.4: Universities as Community Partners

Encourage universities to expand service-oriented partnerships that connect students with local communities and that can strengthen town-gown relationships. 1213.5

Policy EDU-3.3.3: Universities as Large Land Owners and Campus Plan Requirements

Continue to require campus plans for colleges and universities located in residential and mixed-use zone districts. These plans should be prepared by the institutions themselves, subject to District review and approval, and should address issues raised by the surrounding communities. Each campus plan should include provisions that respect neighbors and neighboring property and ensure that potentially objectionable impacts such as noise, traffic, number of students, or other similar conditions are addressed. 1214.8

Policy EDU-3.3.4: Student Housing

Encourage the provision of on-campus student housing in order to reduce college and university impacts on the housing stock, especially the affordable housing stock, in adjacent neighborhoods. Consider measures to address the demand for student housing generated by non-District institutions with local branches. 1214.9

Policy EDU-3.3.5: Transportation Impacts of Colleges and Universities

Support ongoing efforts by colleges and universities to mitigate their traffic and parking impacts by promoting ridesharing, carpooling, shuttle service, bicycling, scooters, skateboarding, and other transportation demand management measures. The provision of adequate on-site parking for institutional uses also should be encouraged. 1214.10

The campus plan is not inconsistent with the Education Element of the Comprehensive Plan. The campus is an open campus, readily accessible to neighbors. The plan proposes expanding this access with a neighborhood-oriented playground in addition to other programs which the community is invited to participate in on campus. Wesley also sponsors an internship program that brings students to work at various non-profit and community organizations throughout the District and seminary students and graduates assist the mission of many churches in the District.

The new campus plan proposal could help to decrease the rental pressures that students place on private housing stock by developing dormitory space not only for Wesley students and their families, but also for American University students and their immediate families. These students and their families would otherwise be seeking market rate housing.

While the seminary does not have a secondary campus, it does rent space in the Mount Vernon Square area to facilitate student involvement with various non-profit and governmental organizations in central Washington.

As discussed in the transportation element section, Wesley intends to improve the pedestrian, bicycle, and shuttle transportation on campus.

Rock Creek West Area Element

Policy RCW-1.1.8: Managing Institutional Land Uses

Institutional land uses in the Rock Creek West Planning Area should be harmonious with surrounding uses, and potential adverse effects on neighboring properties should be minimized when institutions seek expansion. Redevelopment of institutional land should be compatible with the physical character of the community, the changing nature of the District, and not inconsistent with provisions of the Comprehensive Plan and the underlying zoning rules and regulations. Densities and intensities of any future development on such sites should reflect input from the local community, accommodating student housing on campuses and future infrastructure needs. 2308.9

Policy RCW-1.1.9: Conserving Common Open Space

Conserve the large areas of green space and interior open spaces that are common in and around the community's institutional uses and its older apartment buildings. Where these

open spaces are recognized to contribute to the integrity of the site or structure, consideration should be given to reconcile infill with these open spaces. 2308.10

This campus plan is proposing only one new building over the previously approved plan and its modifications. The proposed construction should be harmonious with the nearby neighborhood and the adjacent American University. While the proposed building would be at three stories taller than other buildings on campus, it would be set back from the nearby neighborhood by at least 300 feet and would be less tall than the nearby American University dormitories. As shown in illustrations in the case file, the combination of the existing four-story 2014 dormitory to the north and the additional landscaping should help to reduce the visual impact of the proposed dormitory when viewed from the neighborhood to the north, particularly during warmer-weather months.

Wesley has also worked with the community and incorporated their input into the shaping of the proposed building and the landscaping. In further processing, the applicant would continue working with the neighborhood to refine the design and materials of the new dormitory to ensure the building is congruent with the buildings that would remain on campus and the added landscaping.

The proposed campus plan would increase the number of beds on campus by approximately four-fold and would double the number of parking spaces. The potential impact should be mitigated by the following:

- There would be no increase in enrollment on the campus. The increase would be in the number of beds on campus with the preponderance of beds being rented to AU students and their families. Most of pedestrian circulations would be between the Wesley campus and the AU campus to the south rather than to the residential neighborhoods to the north or east.
- With the increase in the number of parking spaces being proportionately less than the increase in beds; with the prohibition on residential parking permits for those living or working on campus; with the additional restrictions on delivery movements; and with general vehicular traffic being restricted to the Massachusetts Avenue access point, the transportation analysis indicates that the impact of the additional population on campus and additional vehicular storage should not be excessive.

This campus plan is not inconsistent with the Rock Creek West Area Element.

Racial Equity Tool Part 2 – Applicant/Petitioner Community Outreach and Engagement

Wesley has been engaging with the community since its initial campus plan in 2005. The engagement for the currently proposed campus plan effectively began in 2019, in preparation for that campus plan proposal. Involved groups have included ANCs 3D and 3E, a Community Liaison Committee established under the campus plan process and neighborhood civic groups such as the Spring Valley-Wesley Heights Citizens Association, Spring Valley Neighborhood Association, other interested parties and individuals. Wesley lists 45 such meetings in Exhibit 82, Section 3.3 and the changes to plans that resulted from them.

The previous campus plan, PUD and map amendment proposals, were not without opposition. The concerns have been about the scale of the proposed dormitory, prior absence of coordination between Wesley and AU on a dormitory on the Wesley campus that would house significantly more students from AU than from Wesley and the provision of IZ units. There has also been substantial

support for Wesley to remain at the present location and become a financially viable and thriving university.

Racial Equity Tool Part 3 – Rock Creek West Planning Area Data

Part 3 of the Racial Equity Tool asks for disaggregated data to assist the Commission in its evaluation of zoning actions through a racial equity lens for the planning area. The data source is the 2012-2016 and 2019-2023 American Community Survey 5 Year Estimates, available via the OP State Data Center ([ACS DATA](#)). Part 3 also asks if the planning area is on track to meet affordable housing goals, and whether the data shows any “intersectionality of factors such as race, ethnicity, age, income, gender, or sexual orientation within the area of the zoning action and how might the zoning action impact the intersection of those factors”.

Population by Race or Ethnicity

The site is in the Rock Creek West Planning Area (RCW). Table 1 below indicates that the area is not experiencing population growth. In 2012-2016, the Planning Area had a population of 91,389 or 13.9% percent of the District-wide total. In the 2019-2023 period, the population decreased to 86,400 and 12.8% percent of the Districtwide total – a 1.1% decrease of the Districtwide total.

However, while the population has declined somewhat in the last 5 years, the area has become somewhat more racially and ethnically diverse. For the Planning Area population in 2019-2023, the population identifying as White decreased by 8.4% and Hispanic by 0.3% from 2012-2016. Meanwhile, the population identifying as Black increased by 1.5% and Asian by 0.3%. As with some other planning areas, the largest percent increase, 5.7%, was of persons identified as having Two or More Races. Nevertheless, White-identifying residents continue to comprise nearly three-quarters of the Planning Area’s population.

Table 1: Race or Ethnicity Districtwide and in the Rock Creek West Planning Area (2012-2016 and 2019-2023)

Race or Ethnicity	District-wide 2012-16	District-wide Percent	RCW 2012-16	RCW Percent	District-wide 2019-23	District-wide Percent	RCW 2019-23	RCW Percent
Population	659,009	100%	91,389	13.9%	672,079	100%	86,400	12.8%
White alone	266,035	40.4%	73,607	80.5%	262,549	39.1%	62,327	72.1%
Black alone	318,598	48.3%	6745	7.4%	290,772	43.3%	7,722	8.9%
American Indian and Alaskan Native alone	2,174	0.3%	293	0.3%	2,044	0.3%	212	0.2%
Asian alone	24,036	3.6%	5,479	6%	27,465	4.1%	5,481	6.3%
Native Hawaiian and Other Pacific Islander alone	271	0.04%	0	0%	378	0.01%	9	0%

Some other race alone	29,650	4.5%	1,552	1.7%	32,338	4.8%	2,227	2.6%
Two or more races	18,245	2.8%	3,622	4%	56,533	8.4%	8,421	9.7%
Hispanic	69,106	10.5%	9,250	10.1%	77,760	11.6%	8,439	9.8%

Median Income

The Rock Creek West planning area has a higher median income than the District as a whole, as evidenced by data from both the 2012-2016 and 2019-2023 survey periods. The planning area median income, however, increased at nearly the same rate as the citywide median, but these gains were not distributed evenly across racial groups.

The 2012-2016, ACS data identify the median household income as \$118,411 for the Planning Area, which was 62% greater than the median Districtwide household income of \$72,935 (Table 2). There was a significant increase of approximately \$34,000 in the Districtwide median household income for the period 2019-2023. The Planning Area's increase of approximately \$34,000 was generally the same as the District-wide's but, in percentage terms, the increase was greater than the District-wide average. This may be expected, given the planning area's high-income base and high-level of educational attainment.

The information on the table also show that Black or African American have the lowest median income in the District as well as in the Planning Area. In fact, between the time periods Blacks or African Americans and Some Other Race experienced a reduction in median income. In the 2012-2016 time period, the difference between the median income of Black or African American and Whites Districtwide was approximately \$52,000. This difference significantly increases in the 2019-2023 period to an approximately \$100,000 difference. The median income in the Planning Area for the 2019-2023 saw a similar difference in the median income for Blacks or African Americans vs Whites of approximately \$100,000.

Table 2: Median Income Districtwide and in the Mid-City Area (2012-2016 and 2019-2023)

Median Household Income	Districtwide 2012-2016	Districtwide 2019-2023	RCW 2012-2016	RCW 2019-2023
Total Median	\$72,935	\$106,287	\$118,411	\$152,529
Asian Alone	\$91,453	\$121,619	\$91,732	\$121,202
Black or African American	\$40,560	\$60,466	\$76,527	\$74,363
Hispanic or Latino	\$60,848	\$106,435	\$89,692	\$120,638
American Indian and Alaskan Native	\$51,306	\$63,617	\$47,168	n/a
Native Hawaiian and Other Pacific Islander	n/a	n/a	n/a	n/a
Some Other Race	\$48,047	\$74,754	\$100,817	\$85,465
Two or More Races	\$83,243	\$116,869	\$82,692	\$153,640
White	\$119,564	\$166,774	\$128,941	\$174,547

General Characteristics

Between 2012-2016, the unemployment rate in the Planning Area was at 3.5%, which was lower than the District at 8.7% (Table 3). Although the rate of the District fell in 2019-2023 to 6.5%

that of the Planning Area’s increased to 4.1%, but remained well below that of the District as a whole.

The housing cost burden in the Planning Area was approximately 7.5 percentage points lower than that of the District during both the 2012-2016 and 2019-2023 time periods. The poverty rate of the Planning Area 2012-2016 was lower than the District as a whole by approximately half but in the 2019-2023 period the poverty rate in the District and the Planning Area both fell making poverty level Districtwide and in the Planning Area both below 10%.

Table 3: General Characteristics of the Rock Creek West and District (2012-2016 and 2019-2023)

Characteristic	Districtwide (2012-2016)	RCW (2012-2016)	Districtwide (2019-2023)	RCW (2019-2023)
Unemployment Rate	8.7%	3.5%	6.5%	4.1%
Cost Burdened Households	38.6%	31.1%	34%	27.7%
Below Poverty Rate	17.9%	9%	14.5%	7.0%

Median Age and Vulnerable Populations

The Rock Creek West planning area’s median age decreased slightly between the two study periods. In the 2012-2016 time period, the median age of residents in Rock Creek West was slightly older. However, it was slightly younger in the 2019-2023 time period. When race is considered, the data shows that the Black residents and American Indian and Alaskan Native were older than most of the other groups during the two periods. Over the two time period, the number of total percentage of vulnerable residents, those 65 years and older and those under 18 years stayed pretty constant although those within the Planning Area showed some slight increases in all categories although their percentages were lower than those District-wide.

Table 4: Median Age (2012-2016 and 2019-2023)

Median Age	District 2012-2016	District 2019-2023	RCW 2012-2016	RCW 2019-2023
Total Population	37.7	35.5	38.2	34.0
Asian Alone	36.5	35.6	37.8	34.7
Black or African American	33.4	38.1	39.1	39.9
Hispanic or Latino	28.4	32.2	33.7	32.0
American Indian and Alaskan Native	32.2	41.1	35.4	40.8
Native Hawaiian and Other Pacific Islander	30.8	n/a	n/a	n/a
Some Other Race	28.0	28.8	31.9	30.4
Two or More Races	19.8	30.8	31.1	31.0
White Alone	40.4	35.3	39.6	33.4

Table 5: Age/Vulnerable Populations in the District and the Planning Area

Vulnerable Population	District 2012-2016	District 2019-2023	RCW 2012-2016	RCW 2019-2023
Persons 65 and Older	34.2%	32.3%	20.8%	22.0%
Persons Under 18	4.5%	4.5%	1.7%	2.0%
Percent Disable	11.3%	11.0%	5.7%	7.5%

Housing Tenure

More residents in Rock Creek West own their home than in the District as a whole –53.7% compared to 41.1% in 2019-2023. However, the homeownership rate in the planning area decreased slightly over the two survey periods, while there was a small increased District-wide. The homeownership rate among White households had a slight decrease between the time periods, as opposed to citywide, where White ownership decreased by approximately 1%. Black homeownership decreased in the planning area, although somewhat less than the citywide trend. There was an increase in renter occupancy for blacks and a decrease for Whites. The Asian population has the largest increase in percentage of homeownership in the 2019 to 2023 period of 15%. Many other racial groups also experienced a slight decrease in homeownership and an increase in rentals. Some groups experienced a decrease in homeownership as well as in rentals which may indicate that persons are leaving the planning area or have changed their racial identity.

Table 6- Owner Occupied and Rental Households Districtwide and in the Planning Area

Owners/ Renters		Districtwide 2012-2016	District wide 2019-2023	RCW 2012-2016	RCW 2019-2023
Total	Owner Households	40.7%	41.1%	55.1%	53.7%
	Renter Households	59.3%	58.9%	48.2%	46.3%
Asian Alone	Owner Households	43.1%	41.4%	33.0%	48.2%
	Renter Households	56.9%	58.6%	67.0%	51.7%
Black or African American	Owner Households	46.6%	34.8%	29.3%	27.5%
	Renter Households	53.4%	65.1%	70.7%	72.6%
Hispanic or Latino	Owner Households	30.9%	36.4%	51.8%	43.6%
	Renter Households	69.1%	63.6%	48.2%	56.2%
American Indian and Alaskan Native	Owner Households	32.8%	19.6%	50.8%	40.7%
	Renter Households	67.2%	80.3%	49.2%	59.3%
Native Hawaiian and Other Pacific Islander	Owner Households	9.1%	31.8%	0%	0.0%
	Renter Households	90.9%	68.2%	0%	0.0%
Some Other Race	Owner Households	17.5%	28.7%	37.3%	29.9%
	Renter Households				

Owners/ Renters		Districtwide 2012-2016	District wide 2019-2023	RCW 2012-2016	RCW 2019-2023
	Renter Households	82.5%	71.3%	62.7%	70.1%
Two or More Races	Owner Households	32.7%	41.3%	33.8%	47.0%
	Renter Households	67.3%	58.7%	66.2%	53.0%
White Alone	Owner Households	47.8%	48.0%	59.9%	58.8%
	Renter Households	52.2%	52.6%	41.2%	57.6%

The rising cost of housing in the District limits the ability to provide housing for a variety of household types, including family, senior housing, rental and ownership housing, and housing for all income levels. Given the land use characteristics of the District, only a small amount of the total land area (28.1 percent) is dedicated to residential use (205.3). Scarcity of land increases the cost of new housing, limits the availability of housing, and intensifies housing cost burdens, particularly for lower- and middle-income households. The Comprehensive Plan states that “*residents of color are a majority of lower-income households in the District and, therefore, face a disproportionate share of the problems caused by housing insecurity and displacement*” (206.4).

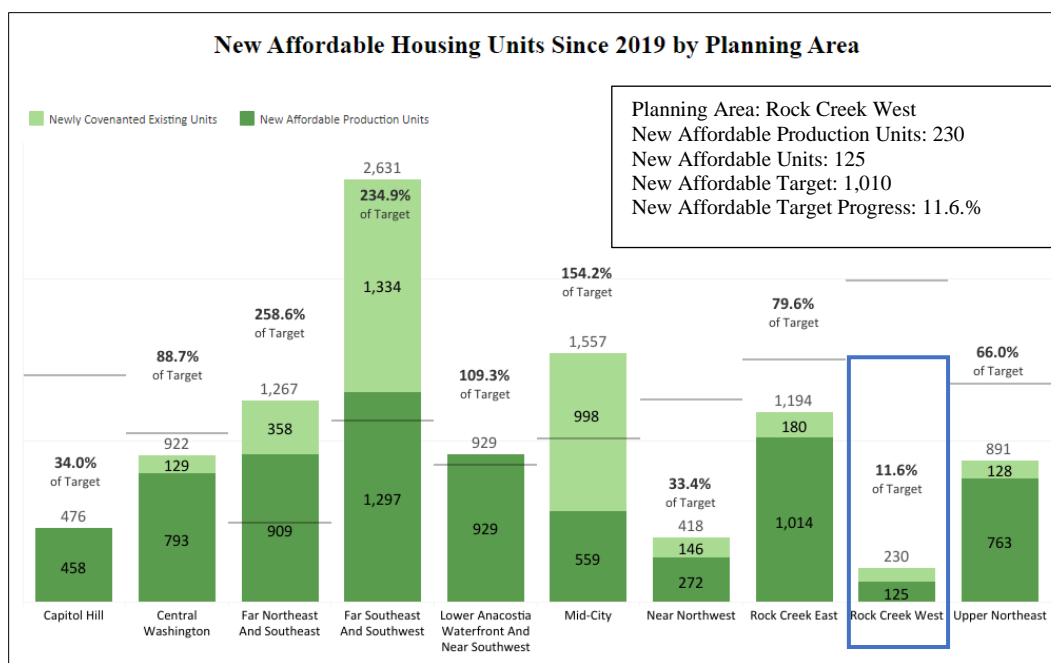
The Comprehensive Plan recognizes that without increased housing the imbalance between supply and demand will drive up housing prices in a way that creates challenges for many residents, particularly low-income residents. The proposed dormitory could free-up off-campus rental units for non-student renters. The Comprehensive Plan further recognizes the importance of inclusionary zoning requirements in providing affordable housing opportunities for households of varying income levels.

Although the proposed new dormitory would not be receiving any additional density over that allowed in the RA-1 zone for institutional uses, Wesley is providing for off-site affordable units within Ward 3. ZC 24-09 outlines the options by which Wesley can provide the affordable units.

Applying the lens of racial equity to zoning actions would target support to communities of color. The Comprehensive Plan states that “*residents of color are a majority of lower income households in the District and therefore face a disproportionate share of problems caused by housing insecurity and displacement*. (206.4).

Progress Toward Meeting the Mayor’s 2025 Housing Equity Goals

Part 3 also asks if the planning area is on track to meet affordable housing goals. The Mayor’s housing goals include the production of 12,000 new affordable units citywide for households earning below 80% of Median Family Income (MFI). The Deputy Mayor for Planning and Economic Development (DMPED) provides regular updates ([DMPED 36,000 by 2025 Dashboard](#)) on how each planning area is progressing in meeting their portion of the affordable housing target. The most recent update (December 2024) indicates that the Rock Creek West planning area is, by far, more distant from achieving its goal than any other planning area. It is possible that the proposed changes to the student housing capacity on the Wesley campus may at least help the planning area to not slip farther behind compared to other planning areas.



Past Racial Discrimination

Racial covenants in neighborhoods near the Wesley campus persisted into the 1960's. OP does not have data showing any discrimination at this site. Wesley has been active in racial and social justice outreach programs and in educating graduates who minister to minority communities. The Seminary's students and staff are more racially diverse than the nearby residential areas. Currently, approximately 34% of Wesley's students identify as Black as do 18% of the administration, 25% of the faculty, and 7% of other staff.

Racial Equity Tool Part 4 – Zoning Commission Evaluation Factors

According to the Racial Equity Tool, the Commission will use the following criteria, themes and questions, along with data provided in its evaluation of a zoning action's consistency with the Comprehensive Plan, as viewed through a racial equity lens. As demonstrated above, the proposed campus plan would advance many of the policies related to racial equity in the provision of housing, job creation, and the advancement of arts and culture.

The table below addresses themes/questions based on Comprehensive Plan policies related to racial equity, that are anticipated to have positive or negative impacts and/or outcomes as a result of the campus plan.

Table 7

Factor	Question	OP Response
Direct Displacement	Will the zoning action result in displacement of tenants or residents?	The campus plan would not result in displacements of residents, per se. The site is an educational campus. There are no permanent residents.
Indirect Displacement	What examples of indirect displacement might result from the zoning action?	OP does not anticipate indirect displacement as a result of this zoning action.
Housing	Will the action result in changes to: <ul style="list-style-type: none"> ▪ Market Rate Housing ▪ Affordable Housing ▪ Replacement Housing 	The campus plan would allow the provision of 735 beds of which 659 would be in the New Dormitory on the Wesley campus. The provision of more student beds may have a marginally positive impact on the affordability of housing in Rock Creek West by freeing up market rate units now rented by students who may relocate to the Wesley campus. In addition, Wesley's contribution to be assigned to facilitate the provision of affordable housing should help to provide additional affordable housing in the Rock Creek West Planning Area and Ward 3.
Physical	Will the action result in changes to the physical environment such as: <ul style="list-style-type: none"> ▪ Public Space Improvements ▪ Infrastructure Improvements ▪ Arts and Culture ▪ Environmental Changes ▪ Streetscape Improvements 	The proposed campus plan would result in improvements to the transportation infrastructure along Massachusetts and University Avenues and add recreational opportunities through the construction of a new neighborhood-oriented playground on the campus.
Access to Opportunities	Is there a change in access to opportunity? <ul style="list-style-type: none"> ▪ Job Training/Creation ▪ Healthcare ▪ Addition of Retail/Access to New Services 	The zoning action would lead to a temporary increase in construction jobs and a permanent increase in jobs to supply and manage the new dormitory.
Community	How did community outreach and engagement inform/change the zoning action? <ul style="list-style-type: none"> ▪ (e.g., did the architectural plans change, or were other substantive changes made to the zoning action in response to community input/priorities etc.?) 	The transportation management plan was amended to restrict traffic entering and exiting from the residentially bordered University Avenue. Residential parking permits were prohibited for all Wesley students and for AU students and immediate family members residing in the proposed dormitory. The designs for the upper stories of that dorm were set-back farther from the residential neighborhood and their layout was changed to avoid light spillage towards the neighborhood. The community-accessible playground was added and the previously proposed retail space in the Consolidated PUD was eliminated. The Applicant states that the ratio of beds to parking spaces in the dormitory was reduced and that the Seminary agreed to keep the existing cap on student, faculty/staff enrollment.

XI. COMMENTS OF OTHER DISTRICT AGENCIES

The application was referred to various agencies and the responses are as follows.

1. Department of Housing and Community Development (DHCD) – No Comment
2. Department of the Environment (DDOE) – See Attachment 1.
3. Fire and Emergency Services (FEMS) – at the time of the original campus plan review, FEMS verbally stated that they had no concerns with the development plan and a full analysis would be done as part of the permitting process.
4. The Department of Transportation (DDOT) is submitting a report under separate cover.

XII. ANC COMMENTS

The campus is within the boundaries of ANC 3E and is across from ANC 3D. Although there are several filings from both ANC's in the record, at the time of the filing of this report there are no recommendations addressing the instant campus plan.

XIII. COMMUNITY COMMENTS

At the time of this report, there are no community comments in relation to Wesley's March 5, 2025 application to resume the processing of the campus plan. However, there are comments relating to prior filings.

XIV. SUMMARY OF PLANNING CONTEXT ANALYSIS AND RECOMMENDATION

As demonstrated above, on balance the proposed campus plan would not be inconsistent with the recommendations of the FLUM for institutional use and with the Policy Map's designation of the surrounding area for neighborhood conservation. Additionally, the campus plan would be not inconsistent with many of the policies and actions of the Citywide Elements and the specific recommendations for the Rock Creek West Area Element. The proposal also meets the Campus Plan requirements and is not likely to become objectionable to neighboring properties.

OP therefore recommends that the Zoning Commission **approve** the Wesley Theological Seminary Campus Plan to Thrive in Place 2023-2033 with the following conditions and those recommended by DDOT.

ATTACHMENTS:

Attachment I –DOEE Comments

APPENDIX I: DOEE STAFF COMMENTS TO OP

DOEE Development Review Comments

ZC 23-08(1): Wesley Theological Seminary Campus Plan (2025-2035)

DOEE applauds the applicant's commitment to achieve LEED Gold certification for the proposed new building and especially appreciates that the applicant will certify the new dormitory with the LEED Multifamily Midrise rating system, which is best suited for this building type and includes features that will benefit future tenants. DOEE encourages the applicant to pursue environmental benefits beyond the LEED rating system and to set overarching sustainability goals for the campus. DOEE can assist the applicant with setting goals that align with those of other colleges and universities and the District as a whole.

DOEE commends the applicant for achieving a 0.6 GAR, which exceeds the minimum 0.4 GAR required for the zone. Stormwater management on this site is more environmentally beneficial given the project's location within the municipal separated storm sewer system (MS4). The applicant should also be aware that its location within the non-tidal MS4 requires all Major Land Disturbing activity to meet detention requirements for the 2-year storm event.

The following recommendations are intended to assist the applicant with incorporating strategies that will improve campus sustainability and minimize the applicant's impact on the environment. Many of these strategies can be financed with no upfront cost through [DC PACE](#). The [DC Green Bank](#) and the [DC Sustainable Energy Utility](#) (DCSEU) also offer innovative financial products and technical assistance to help projects gain access to capital. To learn about project-specific financing options, contact Crystal McDonald at cmcdonald1@dcseu.com or complete DCSEU's [Custom Rebate Form](#).

Please reach out to kate.tanabe@dc.gov for questions or more information.

Net-Zero Energy

Clean Energy DC, the District's detailed plan to reduce greenhouse gas emissions, calls for net-zero energy (NZE) building codes by 2026. DOEE encourages the applicant to explore net-zero energy construction/certification ahead of this planned code requirement. An NZE building is a highly energy-efficient building that generates enough on-site and procures acceptable off-site renewable energy to meet or exceed the annual energy consumption of its operations. NZE buildings can benefit both owners and tenants through significantly lower operating costs, improved occupant comfort and improved indoor air quality. Under the [2017 District of Columbia Energy Conservation Code](#), projects can use Appendix Z as an alternative compliance pathway, which provides a working definition and guidance for NZE.

DOEE has published a Net-Zero Energy Project Guide, a Multifamily Guide, and an Integrated Design Charrette Toolkit to assist project teams with planning, designing, constructing and operating NZE buildings. These and other resources can be found at doee.dc.gov/service/greenbuilding.

The following recommendations break down the energy performance, electrification, and renewable energy elements of a net-zero energy building.

Energy Performance

DOEE encourages the applicant to continue prioritizing energy efficiency as the design is finalized. Maximizing energy efficiency at the time of construction will more cost effectively assist in meeting [Building Energy Performance Standards](#) (BEPS) in the future. The BEPS program was established in Title III of the Clean Energy DC Omnibus Act of 2018. The Act states that starting in 2021, owners of buildings over 50,000 square feet that are below a specific energy performance threshold will be required to improve their energy efficiency over the next 5 years. Projects below the performance threshold will be able to choose between a performance pathway, which requires that they document a 20% reduction in energy usage over the 5-year compliance period, or a prescriptive list of required energy efficiency measures. The next BEPS will be established in 2028 and the compliance threshold will increase with each cycle. New projects are encouraged to maximize energy efficiency during the initial design and construction to meet BEPS upon completion.

Electrification

In line with the District's goal of carbon neutrality and the objectives of the [Sustainable DC 2.0](#) and [Clean Energy DC](#) plans to reduce greenhouse gas emissions, DOEE encourages the applicant to design the new building to be fully electric (i.e., eliminate the on-site combustion of fossil fuels). DOEE also encourages the applicant to develop a phase-out plan for the combustion equipment in existing campus buildings.

DOEE and DOB are evaluating options to include building electrification requirements in future code updates. Building electrification involves powering all building appliances and systems (e.g., domestic hot water, heating equipment, cooking equipment) with electricity rather than fossil fuels (e.g., natural gas or fuel oil). Efficient electric systems reduce indoor air pollution caused by combustion equipment and can save on operating costs, especially when coupled with solar energy. All-electric buildings can also save on construction costs by avoiding the need to install gas piping. It's easier and more cost-effective for new construction to be designed with electric systems than it is to retrofit buildings later, so DOEE strongly encourages projects to evaluate electric options as part of their initial energy modeling exercises. For more information about building electrification in the District, visit [this resource page](#) created by the Building Innovation Hub.

Renewable Energy

DOEE applauds the applicant for committing to integrating solar panels into a green roof on the new building. DOEE encourages the applicant to maximize the roof space covered by these features or consider additional campus areas that may be appropriate for solar panels. These strategies can be combined without diminishing a project's GAR or stormwater requirement compliance. DOEE has issued guidance on how to successfully incorporate solar into green roofs on pages 41 & 42 of the [2020 Stormwater Management Guidebook](#).

Deconstruction, Reuse, and Embodied Carbon Reduction

DOEE encourages the applicant to conduct a simple life-cycle analysis (LCA) to measure and reduce the impacts from the proposed building's structural and envelope design. An LCA is an effective tool to measure the embodied carbon, or global warming potential (GWP), of a building and its materials. An LCA can inform decisions about the selection and quantity of materials used,

and can assist with dematerialization (i.e., reducing the amount of a given material). Dematerialization reduces environmental harm and saves money.

Embodied carbon is the sum of all greenhouse gas emissions resulting from the construction of buildings, including materials and construction activities. It is estimated that 23% of the world's GHG emissions result from construction. Most of these embodied emissions are associated with the production and use of concrete and steel, common structural elements. The energy savings of a high-performance building can take decades to offset the impacts of the building's construction.

Wherever possible, DOEE encourages the reuse of existing buildings and materials because the demolition of these buildings and construction of entirely new buildings is very carbon intensive. Given that this project involves razing the multiple existing structures on-site, DOEE encourages the applicant to explore options for deconstruction and reuse or salvage of materials from the existing structure. Destruction is the process of carefully and intentionally dismantling a building rather than demolishing it. While this process is more time consuming than demolition, reusing salvaged materials can reduce construction costs, and the sale of salvaged or recyclable materials can generate additional revenue.