

Advisory Neighborhood Commission 3D

Government of the District of Columbia



May 7, 2025

Chairman Hood and Members of the Commission
Zoning Commission of the District of Columbia
441 4th Street NW
Washington, DC 20001

RE: Wesley Theological Seminary Campus Plan Case [#23-08(1)]

Dear Chairman Hood and Members of the Commission:

At its duly-noticed meeting of May 7, 2025, with a quorum (4) present, Advisory Neighborhood Commission 3D voted 5-1-0 to support Wesley Theological Seminary's Campus Plan.

As the Zoning Commission is well aware, this campus plan has been under review in one form or another for several years and neighbors and other concerned parties have been actively involved. Wesley has directly engaged in good faith with ANC3D which, when this project was first conceived, had Wesley Seminary within our borders. Now ANC3D is directly adjacent to the Campus and most of the affected neighbors are within the current ANC3D boundaries.

There is already a large case record with many comments from ANC3D, so we do not feel it is necessary to repeat all of our arguments in support of the overall project, but instead, we will primarily highlight the conditions Wesley has proposed in their filing that we consider particularly impactful or important.

Condition 16, 17, and 19 Green Open Space, Landscaping and Playground

Spring Valley is a neighborhood with large lots but very little public open green space which is important for a vibrant community living experience. Wesley is committing to preserving 205,000 square feet of open green space on the campus which provides a welcome oasis for our community. Wesley is generous with this space for community festivals, movie nights, and winter sledding. In addition, a small appropriately sized playground will be constructed and easily accessible from University Avenue. ANC3D sees this as a needed amenity.

Condition 20, 21- Off Site Inclusionary Zoning (IZ)

This has been a tricky issue since student housing is not typically subject to IZ requirements, but since this building will hold American University (AU) students as well as Wesley, it seems appropriate to include funds for IZ housing. Wesley's contributions to the revolving fund Local Initiatives Support Corporation (LISC) will likely provide for more affordable housing for Ward 3 residents than having IZ housing in the building. At a recent Community Liaison Committee (CLC) meeting, LISC gave a robust presentation on how the contribution from Wesley can be used within Ward 3 which historically does not build many affordable units. LISC can provide money to mission-driven developers to maintain and improve existing units as affordable and/or build new affordable units. They projected that the planned \$8 million contribution may benefit 10 projects over the next 10 years, and if each project has between 30 and 50 units that means this fund could be used to support 300-500 units of affordable housing within Ward 3. While a revolving fund of this sort is not a traditional way in which developers satisfy their IZ requirements, we find it very attractive that Wesley's contribution would continue "to keep

giving" over many years. In addition, the adding of student housing units on the Wesley site will likely open up units in nearby apartment buildings that currently are heavily rented by AU students. This revolving fund arrangement must have a mechanism in place to monitor the fund. The Office of Planning (OP) report recommends that a mechanism for monitoring be formed during further processing. We would like for ANC3D and 3E to receive reports when projects are funded or perhaps an annual report on how funds have been distributed.

Conditions 22-32 Transportation and Parking

ANC3D is in support of the traffic management and monitoring outlined in these conditions. This section also calls for new sidewalk construction where currently no sidewalks exist, and this new infrastructure will be a big enhancement to the area. Many of our residents are worried, based on past experiences, that parking and traffic pattern changes due to this development are going to create problems. We believe Conditions 22, 25-32 address these concerns appropriately.

Conditions 33-35 Construction Management

These conditions address our concerns about construction management. In particular, it will be important to have a point of contact on the job site so we can immediately address any issues that may arise.

Condition 39-41

These provisions provide for the continuation of the Community Liaison Committee (CLC), and we see this as vital to keeping dialogue open between Wesley and the community. While ANC meetings are also very important for keeping the neighborhood informed, these meetings are not ideal for full information sharing because there is so much other business that goes on during those meetings. The CLC, in contrast, can be devoted entirely to Wesley topics. Condition 41 specifically provides for review of Campus Plan performance issues identified by the CLC, and we appreciate this condition being included.

Brief Response to Objections

ANC3D has heard objections to this project from Spring Valley-Wesley Heights Citizens Association (SVWHCA) and Neighbors for a Livable Community (NLC) that include violations of the Zoning regulations, lack of affordable housing (addressed above), architecture not matching Wesley's campus, and worries about traffic and parking.

The ZC recently approved a text amendment that states,

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 clearly addresses the zoning regulations regarding this project. We have heard arguments that this is a "commercial" building, but it is a residential building. The SVWHCA-NLC has submitted testimony in opposition that cites Commissioner Peter May's statements from past hearings. In this testimony Commissioner May concedes that the Zoning Administrator opined this building as a "dormitory" because students will live here. Commissioner May refers to this project as a "commercial venture", not a "commercial building" as the opponent's state. Wesley has been forthcoming in their stated purpose of entering into this arrangement— the ground lease from this building will be used as a source of income to continue their mission. The Zoning Commission is within bounds to approve this arrangement should they choose to do so.

As far as the building's architecture is concerned, the new building will only be slightly visible to neighbors and passersby, and we leave it up to Wesley to decide what their campus looks like from within. The conditions set out in the Campus Plan adequately addresses traffic and parking issues.

ANC3D has heard from all residents who want to be heard. It is our conclusion that if this project is approved and the new dormitory is built it will have no objectionable impact on the residents of Spring Valley whom we represent.

Finally, we ask the Zoning Commission to expedite the Campus Plan along with the publishing of the text amendment. We have all worked for years on this project and look forward to its conclusion with the Zoning Commission.

Sincerely yours,



Bernie Horn, Chair