

NEIGHBORS FOR A LIVABLE COMMUNITY

Spring Valley – Wesley Heights

Citizens Association

Testimony By Blaine Carter and Thomas Smith

Z.C. Case No. 23-08(1): Wesley Theological Seminary Campus Plan

Comprehensive Transportation Review (CTR)

July 2, 2025

Chairman Hood and Commissioners:

Subtitle X, Section 101.2 establishes the standards for review of a campus plan which include that the uses are “not likely to become objectionable to neighboring property” due to traffic and parking. The Comprehensive Transportation Review (CTR) is a tool for data-driven decision making. This CTR serves as evidence that Wesley’s Campus Plan is objectionable to neighboring property because of traffic and parking; and consequently, the Campus Plan application fails to meet the standards for approval at this time under **Subtitle X, Section 101.2**.

The CTR filed in this case on June 12 was developed for a different Wesley Campus Plan case (**Z.C. Case No. 22-13**) that went undecided and was closed. This CTR is an incomplete analysis of the traffic and parking impacts associated with the Wesley Campus Plan; relies on old data; and is not timely. Consequently, the CTR’s analyses of existing traffic conditions, background conditions, and future conditions are not valid. Despite triggering DDOT’s threshold for mitigation, the CTR also fails to include any specific mitigation for two critical study intersections that Gorove Slade concludes operate at unacceptable levels of service.

There are seven major issues presented by the CTR.

(1) The CTR is limited to impacts associated with the proposed Landmark building.

The CTR states clearly on Page 11 that “the subject of the CTR is the new student housing building.” The CTR’s data and analysis focus almost exclusively on the traffic impacts associated with the residents of the proposed Landmark building. This CTR would seem to be more appropriate if this case was a Further Processing for the proposed Landmark building. The CTR is not an assessment of the traffic impacts of the Campus Plan as a whole as is typical in Campus Plan cases.

(2) The CTR relies on old data collected 5-22 years ago.

Limited new data was collected for this CTR in Fall 2021; but, the CTR states this data is not credible and “not representative of typical conditions.” Instead, the CTR relies on data collected more than five years ago in February 2020 for the 2021 American University Campus Plan and data collected 14 years ago in 2011 for the 2012 Wesley Campus Plan Update which, itself, relied on data collected 22 years ago in 2003. Industry best practices suggest that historical data is most reliable if extrapolated over no more than two years. And even then, it is recommended the extrapolated data be tested against what is referred to as “real world ground truth data.” In this case, the data is extrapolated over a period of 5-22 years.

(3) The multimodal trip generation data is limited to residents of the proposed Landmark building.

The CTR’s multimodal trip generation data – which shows how the campus is accessed by students, faculty, and staff – is based solely on trips made by residents of the proposed Landmark building using a trip generation model. The CTR includes no “real world” trip generation data for Wesley’s faculty, staff, or other students, including commuter students, who comprise 80 percent of the Wesley student body. Wesley’s 2012 Campus Plan Update noted that “commuter students

have the most significant impact on traffic generation and parking demand” on the Wesley Campus. Any analysis of transportation impacts tied to the Wesley Campus that does not include new data on Wesley’s commuter students is simply not credible.

(4) The CTR includes no analysis of Future Conditions, as required.

The CTR’s assessment of Future Conditions, another critical element of any traffic analysis, projects out only to 2024. 2024 is no longer the future – it’s not even the present.

5.) The CTR’s assessment of Background Conditions is outdated and no longer applicable.

The CTR also assesses Background Conditions – that is, how the Campus Plan when examined within the context of other new developments—might impact the transportation network and Future Conditions. This CTR did not include any other new developments because Gorove Slade determined that there were none when this CTR was completed in 2021. That is no longer the case.

(6) The CTR fails to offer mitigation for two critical failed study intersections, as required by DDOT policy.

The CTR states on Page 43 that two study intersections operate at unacceptable levels of service and under DDOT rules must be mitigated. The Massachusetts Avenue and Wesley Circle study intersection operates at an “E” Level of Service. This is the intersection off Massachusetts Avenue that many Spring Valley residents, especially those closest to Wesley, use for neighborhood ingress and egress. The report shows this intersection experiences high traffic volumes and longer than appropriate traffic queuing delays. Gorove Slade even recommends that DDOT conduct a safety audit of this intersection stemming from a review of crash data.

The second failed study intersection, which operates at an “F” Level of Service is where Massachusetts Avenue intersects with the Wesley Main Entrance Driveway. This is only about 440 feet from the Massachusetts Avenue and Wesley Circle intersection – and about 200 feet from an existing pedestrian signal. Let me now turn this over to Blaine Carter.

As the CTR states, DDOT policy requires that Wesley develop a Transportation Demand Management Program (TDM) to mitigate these failed intersections. Wesley’s TDM proposal is standard boilerplate. The proposed TDM offers nothing targeted specifically to mitigate problems with these two intersections.

DDOT has required that Wesley develop a Performance Monitoring Program (PMP) to track progress in achieving its TDM goals. The PMP sets a baseline of trip goals for the campus, but it is based on the old and incomplete data used in the CTR; yet, its 101-trip threshold for what is considered acceptable exceeds the number of trips permitted in Wesley’s current Campus Plan. Wesley also proposes a survey to collect data on how all Wesley residents, faculty, staff, and commuter students access the campus. This is precisely the type of data that is collected for a Campus Plan. Without such data, it is not possible to develop a reliable TDM plan.

(7) Wesley’s proposed parking proposals are not supported by any parking utilization data.

Wesley’s parking proposal for this plan is another major problem. Wesley, which now has 174 surface parking spaces, started this process by proposing 391 parking spaces (**Z.C. Case No. 22-13**), increased it to 394 for the PUD case (**Z.C. Case No. 23-08**), and is now proposing 295 (**Z.C. Case No. 23-08(1)**). Wesley’s parking proposals have never been data-driven because the CTR

includes no parking utilization study, which is another common element of a Campus Plan CTR missing in this case.

The absence of any parking data means that over the course of the last four years, nobody has even bothered to count the number of cars parked in Wesley's lot despite the number juggling in Wesley's Campus Plan proposals. Where are the results of Wesley's semi-annual parking reports that were required as a condition of the current Campus Plan? If historic patterns are to be used, the 295 parking spaces will be woefully inadequate resulting in drivers choosing instead to park on nearby neighborhood streets.

Wesley is proposing that 187 of these 295 parking spaces will be used by the 659 residents of the proposed Landmark building and visitors to the Campus. Wesley staff, faculty, on-campus residents living in other Wesley housing, and Wesley's commuter students will share 108 spaces.

The latest real data for Wesley's parking use is included in the 2012 Wesley Campus Plan Update that included parking utilization data collected nearly 14 years ago in October 2011 for 174 parking spaces on the Wesley Campus. That report noted that parking demand at Wesley historically exceeded supply with 91 percent of commuter students preferring to drive alone to the campus. The parking data showed an average of 93 percent utilization of parking spaces from 10:30AM to 3:30 PM. When the parking lot was busiest, the data showed that University Avenue in the Spring Valley neighborhood was the preferred place for overflow parking.

Based on the CTR in this case, Wesley's Campus Plan creates objectionable conditions based on traffic and parking and fails to provide any specific proposals to mitigate these objectionable conditions.

This CTR was prepared at a time when the world was emerging from the throes of a pandemic. Wesley's Campus Plan cases have been postponed multiple times at Wesley's request because the application was not ready for final action. Nearly a year passed from when this case was held in abeyance to when Wesley requested in March 2025 that the Commission resume its review after Wesley submitted another revised Campus Plan proposal. There has been more than enough opportunity to collect "real world ground truth data" and prepare a revised CTR in a post-COVID environment.

Based on the CTR's data and analysis, Wesley's Campus Plan does not comply with the standards for approval outlined in **Subtitle X, Section 101.2**. We call on the Commission to require the applicant to do the work it should have done at least a year ago and submit a new CTR that may offer more insight into existing, future, and background conditions and allow for informed data-driven decision making in this case.

Thank you. This concludes our testimony.