

NEIGHBORS FOR A LIVABLE COMMUNITY

Spring Valley – Wesley Heights Citizens Association

July 21, 2025

Mr. Anthony J. Hood, Chairman
D.C. Zoning Commission
441 4th Street NW, 2nd Floor
Washington, D.C. 20001

RE: Zoning Commission Case No. 23-08(1) – Reply To Wesley Theological Seminary Comments On Comprehensive Transportation Review (CTR) Trip Generation and Performance Monitoring and Reporting Requirements

Dear Chairman Hood and Members of the Commission:

Neighbors for a Livable Community (NLC) and the Spring Valley-Wesley Heights Citizens Association (SVWHCA) submit this filing in response to comments filed on July 18, 2025 by Wesley Theological Seminary in the above-referenced case. Wesley's July 18 filing asserts the following: (a) Total trip generation for the Wesley Campus will remain historically low under the proposed Campus Plan; and (b) Wesley was not required to file traffic and parking monitoring reports required as part of the current Campus Plan (*Z.C. Order No. 05-40A*). Neither assertion is accurate.

- 1. The Comprehensive Transportation Review (CTR) filed in this case states unequivocally that Wesley's Campus Plan trip generation totals are based on data that is "not representative of typical conditions" and, consequently, cannot be judged as being credible.**

During the July 2 hearing on the Comprehensive Transportation Review (CTR), Mr. Daniel Solomon, Gorove Slade's expert witness, acknowledged that the objective of the CTR "is to understand

the differences for adding the new residence hall.” As Mr. Solomon noted, the subject of the CTR was **NOT** Wesley’s Campus Plan as a whole, but focused only on the proposed new student housing building. Mr. Solomon’s comments were consistent with the language used in the CTR, itself.¹

Although the CTR provides trip generation and mode splits for the proposed student residential building, it does **not** contain this data for the campus as a whole as is routinely expected of a CTR in a Campus Plan case. Under cross examination, Mr. Solomon was unable to provide the missing data at the hearing. In its July 18 filing, Wesley claims to provide trip generation data for the campus as a whole, but the filing does not include the critical mode split data which would demonstrate the mode of travel used to access the campus and guide the development of a Transportation Demand Management (TDM) proposal.

The July 18 filing states that the source for the trip generation number was data collected for this study in 2021. The CTR, itself, states unequivocally that this data was “not representative of typical conditions due to the ongoing COVID-19 emergency.”² The CTR, itself, dismisses the 2021 data collection effort as lacking credibility and states it relied instead on old data collected as part of previous campus plan cases dating back to the 2012 Wesley Campus Plan.³

Despite Gorove Slade’s concern that this questionable 2021 data would produce atypical lower numbers “not representative of typical conditions,” the trip generation data now being offered by Wesley actually shows that the number of trips to the Campus under the proposed Campus Plan will increase by 18.5 percent. **That is, the trip generation numbers exceed the trips reported in Wesley’s**

¹ “The purpose of this CTR is to evaluate whether the project (e.g. a new student housing building) will generate a detrimental impact to the transportation network surrounding the site.” Wesley Campus Plan – Comprehensive Transportation Review (CTR), April 29, 2022, Page 1.

² Comprehensive Transportation Review (CTR), April 29, 2022, Page 21.

³ The CTR for the 2012 Wesley Campus Plan relied on data collected by Gorove Slade for the 2006 Wesley Campus Plan.

2012 Campus Plan (Z.C. Order No. 05-40A) by 18.5 percent. (See Appendix A.)⁴ In fact, the 2012 Campus Plan mandates Wesley not exceed that trip total for the life of the current Campus Plan.

Why would Wesley rely on data that its own experts claim is discredited to suggest that total trip generation will remain historically low under the proposed Campus Plan when in fact the data shows higher trip generation totals?

During the July 2 hearing on the CTR, Wesley's expert witness responded to a series of critical questions on trip generation and performance monitoring as shown in the following table:

Cross Examination Question From NLC/SVWHCA	Gorove Slade Expert Response
Why does the CTR state its focus is only the proposed Landmark building, but not the Campus Plan as a whole?	"I can't speak to that."
Given the history of parking issues on the Wesley Campus, why is there no parking utilization data?	"I can't speak to that."
Were you aware that the 2012 CTR stated commuter students had the greatest impact on trip generation?	"I can't speak to that."
What is the basis for the 101 peak trips in the proposed TDM's traffic monitoring plan?	"I can't speak to that."
Were you aware of the monitoring requirements mandated in the 2012 Campus Plan?	"I don't know."
Why was the CTR not updated with new present-day data given the limitations on collecting data in 2021?	"I can't speak to that."

The expert's response to these and other related questions was either "I don't know" or "I can't speak to that" or blame was put on the District Department of Transportation (DDOT) and even the applicant. **In short, Wesley's expert witness was unable to provide much expert testimony on the issues that are fundamental to the credibility of the CTR in this case.**

The 18.5 percent increase in trip generation reported in the July 18 filing is particularly significant. Wesley's previous 2012 CTR demonstrated that the number of trips to the Campus had been

⁴ Appendix A is a chart prepared as part of the CTR for Wesley's current Campus Plan (*Z.C. Case No. 05-40A*) by O.R. George & Associates comparing trip generation data for the current 2012 Wesley Campus Plan to the 2005 Wesley Campus Plan (*Z.C. Case No. 05-40*). The 2012 CTR showed that Wesley generated 53 morning peak hour trips and 71 afternoon peak hour trips. That data also showed that the highest number of trips to and from the campus was generated between 1 – 3 PM.

declining since 2004. Wesley's new increased trip generation totals cited in Wesley's July 18 filing demonstrate this pattern has been reversed and that trips to the Campus are increasing. This also indicates the TDM measures put in place by Wesley as part of its 2012 Campus Plan, which were considered at the time to be robust, were simply ineffective. Wesley's decision to ignore parking and traffic monitoring and reporting requirements in *Z.C. Order No. 05-40A* and *Z.C. Order No. 05-40B* contributed to the increase in trip generation data in that any increase discovered as part of performance monitoring would have triggered additional TDM measures under the terms of the 2012 Campus Plan.

Although Wesley's proposed TDM plan in this case may seem robust on paper, the new trip generation numbers provided in the July 18 filing – coupled with the data holes in the CTR, especially the absence of any mode split data – should invite – at a minimum – added scrutiny of the proposed TDM plan.

As the CTR states, Gorove Slade relied mostly on old data from the 2012 Wesley Campus Plan for trip generation data entering and exiting the Wesley Campus.⁵ When Mr. Solomon was asked under cross examination about the CTR for the 2012 Wesley Campus Plan, including the “historic” trip generation data, he responded with “I don’t know” and “I can’t speak to that.”

The trip generation numbers provided by Wesley in its July 18 filing raise even more questions about the credibility of relying on a 2022 CTR in a 2025 Campus Plan case. The CTR is incomplete because the data and analysis is limited to the proposed new student residence hall and already outdated. For example, Mr. Solomon testified under cross examination that an assessment of future conditions should be targeted for 2-3 years in the future; yet, the future conditions analyzed in the 2022 CTR are already 2 years in the past.

⁵ Comprehensive Transportation Review (CTR), April 29, 2022, Page 21.

Wesley's July 18 filing of trip generation data further affirms our view that the CTR is an incomplete analysis of the traffic and parking impacts associated with the Wesley Campus Plan; relies on outdated data; and is not timely. As the July 2 hearing demonstrated, Mr. Solomon had no knowledge of the previous traffic study data and conclusions that were used as the basis for developing the CTR in this case.

As we stated in our July 2 testimony, industry best practices suggest that historical data is most reliable if extrapolated over no more than two years. In the CTR in this case, the data is extrapolated over a period of 5-22 years. The Institute of Transportation Engineers (ITE) also warns that post-pandemic traffic shifts mean historical data can be unreliable unless corrected. It is recommended the extrapolated data be tested against "real world ground truth data."

We believe the CTR should be updated either by (a) including an expert analysis of present-day data collection efforts focused specifically on trip generation and mode splits; or alternatively (b) that the data used in the CTR be validated with "real world ground truth data" collection consistent with industry standards.

As Chairman Hood noted at the July 2 hearing, the Commission must depend on experts on highly technical issues. Although it might have been appropriate in 2020 for the experts to rely on old data because of the challenges of collecting data during a COVID emergency, that emergency has long passed. As Chairman Hood also noted at the hearing, a lot of things have changed since COVID, as the ITE guidance on the use of historical data confirms. In this case, the experts have failed the public and the Commission by not proactively updating the CTR as this Campus Plan case has evolved over the last three years consistent with industry standards. This may help explain why Wesley sought to avoid any scrutiny of the CTR by failing to file it until mandated by the Commission.

The Commission should insist that the CTR be updated prior to making any decision in this Campus Plan case.

2. Contrary to Wesley's assertion, Wesley has not complied with the parking and traffic monitoring and reporting requirements of its current Campus Plan.

Wesley's July 18 filing misleads the Commission into thinking that Wesley has not been required to comply with parking and traffic performance monitoring and reporting requirements mandated as part of its 2012 Campus Plan (*Z.C. Order No. 05-40A*). Wesley continues to operate under that Campus Plan Order. *Z.C. Order No 05-40A* includes two conditions requiring Wesley to conduct and complete traffic and parking performance monitoring reports.

The rigorous performance monitoring requirements in the 2012 Campus Plan reflected DDOT's view that Wesley – despite having an enrollment that pales to its neighbor American University – contributes a disproportionate amount of traffic to the network for its small size. This reflects Wesley's status as primarily a commuter school – an issue that the CTR in this case completely ignores.

Condition 10(G) requires Wesley to provide **semi-annual** monitoring reports on its parking utilization. *Condition 10(J)* requires the applicant to perform a traffic monitoring survey annually for the first two years of the Campus Plan and then every other year for the duration of the term of the Campus Plan. If the trip generation exceeded 53 trips in the morning peak hour or 71 trips for the afternoon peak hour, Wesley was required to initiate additional TDM measures.

There is no record of Wesley ever complying with these requirements at any time during this Campus Plan cycle.

As Wesley stated in its July 18 filing, the Commission agreed in 2016 to suspend **some** performance monitoring requirements **under specific conditions** (*Z.C. Order No 05-40B*). *Z.C. Order*

No. 05-40B made no changes in the performance monitoring requirements outlined in *Condition 10(G)* – the parking utilization monitoring requirement. The absence of any parking utilization data in the CTR suggests that Wesley continues to fail to comply with this performance monitoring requirement.

Condition 10(J), the traffic monitoring requirement, was suspended **IF AND ONLY IF** Wesley's enrollment – based on a headcount – fell below 505. A headcount would consist of all students enrolled at Wesley, including its Masters, Doctoral, and Non-Degree students. Wesley's own filing in this case (*Exhibit No. 82*) shows that Wesley's headcount has not fallen below 505 at any time during the term of the current Campus Plan.⁶ This means that Wesley has been required to conduct and file traffic monitoring reports throughout the life of the current Campus Plan.⁷

Wesley tries to mislead the Commission into thinking that the performance monitoring suspension was a blanket suspension and based solely on its Masters enrollment. By failing to note the actual conditions of the suspension, Wesley seems to be trying to rewrite the Commission's Zoning Order 9 years after it was approved to cover up its failure to comply with the reporting requirements.

Had Wesley complied with this requirement, this data would have been available for review and analysis as part of the CTR for the Campus Plan that is the subject of this case. Wesley's failure to comply with this requirement is both significant and regrettable. This performance monitoring data would have painted a more accurate picture of the traffic and parking impacts associated with the Campus Plan rather than the CTR that is being used in this case.

The Commission may be wise to recognize the limits acknowledged by the expert witness who testified in this case on July 2. In short, there are too many questions that the experts are unable or unwilling to answer. The Commission cannot point to the analysis in this deeply-flawed CTR to

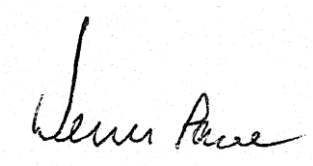
⁶ Z.C. Case No. 23-08(1), Exhibit No. 82, Wesley Theological Seminary – 2011 to 2025 Enrollment History, Page 18.

⁷ If Wesley's non-degree students are excluded from the headcount totals, Wesley's enrollment of degreed students exceeded the 505 threshold through 2018 and required Wesley to file traffic monitoring reports.

conclude that the Campus Plan as proposed meets the standards of ***Subtitle X, Section 101.2*** that the proposal will not pose objectionable impacts on neighboring property based on parking and traffic. We encourage the Commission to require Wesley to update the 2022 CTR prior to taking any further action in this case.

This should have been and easily could have been done prior to Wesley requesting a resumption of this case. Although Wesley is likely to complain about a months-long delay, Wesley only has itself to blame.

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis Paul", is positioned above the typed name.

Dennis Paul, President
Neighbors for A Livable Community

S/William F. Krebs
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Interim President and Counsel
Spring Valley-Wesley Heights Citizens
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Counsel, Neighbors for a Livable
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Appendix A

Trip Generation Data For 2012 Wesley Campus Plan

And 2005 Wesley Campus Plan

Z.C. Case No. 05-40B

Development Scenarios

Typically, all studies should include the following scenarios:

- Existing conditions
- Future conditions, at the anticipated build-out year of the development, without the construction of the development (Background Conditions)
- Future conditions, at the anticipated build-out year of the development, with the construction of the development (Total Future Conditions)
- Forecast year

If the proposed development will be in stages, with significant trip generation for each stage, individual phases will need to be examined individually.

Proposed Scope:

- Existing conditions (as per above)
- Future conditions – qualitative assessment only, considering the negative growth trends in trip generation and strong TDM measures proposed
- Forecast year – qualitative assessment only

Note: Land use elements and campus population are to remain virtually unchanged over the planning horizon. (See table on Page 1 and traffic trends 2004-2011 in the table below.)

WTS VEHICLE TRIP GENERATION COMPARISONS – 2004 vs. 2011 DATA (WEEKDAY)

Study Timeframes	AM Peak Hour			PM Peak Hour		
	IN	OUT	TOTAL	IN	OUT	TOTAL
December 2004 (Gorove Slade)	71	20	91	54	77	131
October 2011 (ORGA)	46	7	53	29	42	71
Net Change in %	(35%)	(65%)	(42%)	(47%)	(45%)	(46%)

CERTIFICATE OF SERVICE

We hereby certify that the foregoing document was delivered via electronic mail on July 21, 2025 to the following:

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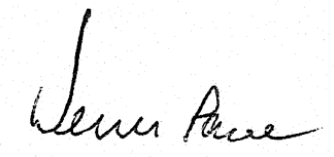
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