

NEIGHBORS FOR A LIVABLE COMMUNITY

Spring Valley – Wesley Heights Citizens Association

November 23, 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. 23-08A – Wesley Theological Seminary Campus
Plan Further Processing, New University Housing – Response To November 21
Filing By Wesley Theological Seminary on NLC/SVWHCA Motion Requesting
Landmark Be A Co-Applicant In The Case**

Dear Chairman Hood and Members of the Commission:

Neighbors for a Livable Community (NLC) and the Spring Valley-Wesley Heights Citizens Association submit this brief response to Wesley's opposition (**Exhibit 26**) to our November 20, 2025 motion (**Exhibit 24**) requesting that Landmark Properties be included as a co-applicant in the above-referenced case.

In making this motion, NLC and SVWHCA are well aware that Wesley will remain the property owner of its Campus under a ground lease with Landmark Properties. Wesley, however, ignores that its ground lease arrangement makes Landmark the owner of the proposed university housing. The District of Columbia requires the recordation of the ground lease when it is 30 years or greater and Landmark will be subject to recordation, transfer, and other taxes. Wesley has acknowledged in the record of this case that Landmark will be the sole owner, builder, and manager of the proposed university housing. Wesley may be the landlord; but Landmark, as the ground lease holder for a 99-year ground lease, has long term rights to use the land. In this case, Landmark will control use of the proposed new university housing and will be responsible for building expenses, including maintenance for the building and the land it occupies.

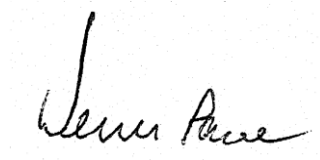
Consequently, Landmark should be considered a co-applicant in this case according to the requirement of **Subtitle Z, Section 302.4** which states the application should include the name, address, and signature of **each owner of property** included in the area to be developed. In short, Landmark is a property owner in this case. NLC and SVWHCA feel strongly that they should be a co-applicant in this case so that all questions can be answered by the responsible party for the new Landmark-owned building.

In its response, Wesley also cavalierly dismisses past practice of the Commission in Campus Plan cases as demonstrated in **Z.C. Case No. 16-18A**, the Georgetown University-Medstar Further Processing for the Medstar Georgetown University Hospital. This case also involved a ground lease on university property as part of a Campus Plan Further Processing.

Although arguing the motion is “untimely,” Wesley acknowledges that NLC and SVWHCA raised this issue to the Commission as far back as September 12, 2025 (**Exhibit 12**). NLC and SVWHCA were not designated a party in the case at that time. Now that NLC and SVWHCA have been designated a joint party, the motion provides a mechanism for the Commission to address the issue we first raised in September consistent with the procedures of the zoning process.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis Paul", is written over a light gray rectangular background.

Dennis Paul, President
Neighbors for A Livable Community

S/William F. Krebs
DC Bar No. 960534
Interim President and Counsel
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Certificate of Service

We hereby certify that on November 23, 2025 copies of the attached were delivered via e-mail to the following:

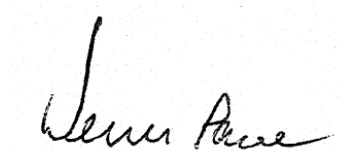
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