

NEIGHBORS FOR A LIVABLE COMMUNITY

Spring Valley – Wesley Heights Citizens Association

STATEMENT IN OPPOSITION

BY BLAINE CARTER ON BEHALF OF NEIGHBORS FOR A LIVABLE COMMUNITY (NLC) AND THE SPRING VALLEY- WESLEY HEIGHTS CITIZENS ASSOCIATION (SVWHCA) Z.C CASE NO. 23-08A: WESLEY THEOLOGICAL SEMINARY CAMPUS PLAN FURTHER PROCESSING

NOVEMBER 24, 2025

Charman Hood and Commissioners:

When Wesley first brought this case before the Zoning Commission in March 2022, I never would have imagined testifying before you yet again – nearly four years later – about its plan to enter into a ground lease with a commercial developer, Landmark Properties, to house more than 600 American University (AU) students on the Wesley campus. In the words that Yogi Berra made famous – “it’s déjà vu all over again.”

Over the last four years, Wesley has cited a need to “thrive” as justification for giving Landmark Properties access to Wesley’s land to house AU students. This comes after several proceedings before the Commission from 2011-2019 in which Wesley said it needed to modify its 2005 Campus Plan because its financial condition was dire. In 2011, Wesley said modifications to its Campus Plan that were approved by the Commission would ensure its financial well-being for 50 years. The modifications included the construction in 2014 of a new 76-bed suite-type dormitory that Wesley said

“will be the last piece of construction on this site for a generation.” Just 11 years later, here we are again.

Chairman Hood, you are the only remaining Commissioner from that time, and you might recall that Neighbors for a Livable Community (NLC) and the Spring Valley-Wesley Heights Citizens Association (SVWHCA) appeared routinely before this Commission to support Wesley’s requests. In fact, there was even one hearing when we sparred with Commissioners and DDOT to encourage a relaxation of traffic monitoring requirements that would have cost money which Wesley – our neighbor – said it did not have.

Yet, in this case, our two organizations find ourselves – for the first time in our histories – in the disquieting position of opposing Wesley’s latest plan to secure its finances.

The case records over the last four years show that Wesley has advised the Commission that its enrollment has stabilized and is even growing and that its housing is fully subscribed. What data we were able to get from Wesley – albeit incomplete – suggested otherwise. As part of this Further Processing, we requested more data from Wesley and Wesley has provided it. That data leaves us surprised, if not alarmed. (See Attachment A.¹) This is the type of data that the Office of Planning (OP) should have collected as part of its overall analysis of this case.

Wesley was authorized in 2005 to provide 172 beds in three buildings to house its students on campus. Wesley has only been using two of the three buildings with a housing capacity of 117. Wesley now reports that only 45 beds are occupied on campus by Wesley students, families, and visitors, including only 24 beds in the 76-bed dorm that opened in 2014. The 2014 building will continue to operate as a residence hall under the Campus Plan approved in July, 2025 by the Zoning Commission.

¹ Attachment A, Pages 7-8.

This tells only part of the story. Wesley volunteered that – on average – only 50 students are on the campus each day Monday through Thursday with a high of 88 on Tuesday and a low of 25 on Wednesdays. This is averaged over a 4-day week because there are no classes on Friday, Saturday, or Sunday, according to Wesley.

Of the 248 Master's students enrolled at Wesley at the current time, 181 or 79 percent commute to the campus. Wesley notes that its doctoral students do not come to campus regularly and many never come to campus. Wesley advised that fewer students, faculty, and staff are required to come to campus because of remote classes and work.

So, no wonder the Wesley campus is so quiet and that it currently poses no objectionable conditions for neighboring property, as defined in the zoning regulations. We have some concerns about the Comprehensive Transportation Report (CTR) that was filed in this case; but after reviewing this new data from Wesley, it would be absurd to raise transportation concerns despite the high percentage of commuter students. Wesley's numbers indicate even its commuter students are not coming to the campus. The new data from Wesley goes beyond confirming our worst fears. Wesley's 8.6 acre campus, which has a 2026 assessed value of more than \$70.3 million – despite having buildings designated by the city as being vacant – is a campus in name only.

Given how Wesley's land is being used, we now – more than ever – question the extraordinary relief the Commission has granted Wesley through the text amendment process. With that decision, the Commission gave a commercial developer discounted access to incredibly valuable land. There were other ways for Wesley to monetize its land while protecting the integrity of the zoning regulations and D.C. land use policies.

It will come as no surprise that NLC-SVWHCA opposes this Further Processing application.

Let me be clear in stating that we do not oppose new student housing on this campus. **We oppose Wesley building a 659-bed residence hall for AU students on the Wesley campus.** We oppose Wesley giving a developer – whose commercial business is student housing – access to institutional land in the District of Columbia that has an underlying residential zoning classification. Landmark will provide student housing that is not even targeted to the institution that owns the property and whose students have **no** need for a 659-bed residential facility. This Commission has tried to muddle this issue by treating both AU and Wesley as a single or combined institution because they are neighbors. They are separate institutions and separate property owners with separate Campus Plans that have fundamentally different educational missions. Treating them otherwise is contrary to the Zoning Regulations.

Following are our six reasons for opposition to this Further Processing application.

First, despite the text amendments adopted by the Commission specifically to move Wesley’s plan forward, the Landmark building, which is the primary element of this Further Processing application, still does not comply with ***Subtitle X, Section 101.4*** of the Zoning Regulations. ***Subtitle X, Section 101.4*** states that the campus plan process shall not create developments “unrelated to the educational mission of the applicant.”

The data provided by Wesley further amplifies what we have been saying for some time – and that the case record shows this Commission has never addressed: **there is nothing about the Landmark building that is related to Wesley’s educational mission.** No matter how Wesley may try to “spin” its proposal, it is nothing more than a financial transaction between Landmark and Wesley.

Second, in addition to not meeting Wesley’s educational mission, the Landmark building also does not comply with **Subtitle X, Section 101.2**, which cites “number of students” as an objectionable condition. The Landmark building will be located so as to become objectionable to neighboring

property because of the high number of AU students that Landmark will house on the Wesley Campus. This building will dominate the Wesley campus and dwarf the existing Wesley building infrastructure. It even will have a larger housing capacity than all but one of the 12 AU dorms on the AU Campus. Reflecting the trend for smaller residence halls on campus, most of the dorms on the AU Campus house only half the number of AU students planned to be housed in Landmark's building. **The Landmark building would be an anomaly even on the AU Campus.**

The low-density and low-rise Wesley Campus has served as an effective buffer between AU and the low density residential Spring Valley neighborhood. That will end with the Landmark building, which will dominate the hilltop overlooking the Spring Valley neighborhood.

Third, *Subtitle X, Section 101.2* cites noise as an objectionable condition. As part of this Further Processing, Wesley has not addressed noise issues stemming from students' use of the amenities in the center courtyard of the proposed building. Given the building's location – and based on history in working with AU on sound issues – we know that the building's location on top of the hill will contribute to sound traveling into the neighborhood. Wesley has offered no information in its application to assuage neighbors' concerns about noise. Complaints about noise from residents of an off-campus Landmark building in College Park for University of Maryland students only deepens concerns about noise.

Fourth, we have heard from many residents who worry that this project will be a financial failure or that Wesley will fail and have no choice but to leave its site despite whatever agreement they have with Landmark. They cite Wesley's history of failed long term planning. They also express concern that the Commission is making decisions on this project without having done any review of the terms of the Landmark-Wesley agreement or even asked to review an annual financial statement that most colleges and universities would provide routinely as part of an Annual Report.

Wesley has cited financial need to seek special treatment from this Commission, including a change in the zoning regulations that would apply only to the Wesley-Landmark project. Further Processing is the time when Wesley should be required to document this need and to document how its agreement with Landmark will achieve the desired outcome. Although Wesley has the burden of proof in this process, its application is silent on this issue.

Fifth, when Wesley rushed to file a Further Processing application only 8 days after the Commission voted to approve its Campus Plan, even a cursory review of the application demonstrated that Wesley had not yet resolved many of the issues that Wesley pledged to address during Further Processing. This includes Wesley's construction management, security, and Inclusionary Zoning (IZ) proposals.

Despite our opposition to this Further Processing, we took the initiative to reach out to Wesley in late September to discuss construction management and security. This was not the first time we reached out to Wesley throughout this multi-year process; but Wesley has not seemed too interested in engaging directly over the last four years with NLC and SVWHCA given our opposition to its proposal.

Based on experience with AU and Wesley on new construction projects over many years, we know that how construction management and security are addressed will have significant day-to-day impacts for the neighboring residents.

Although disruption and inconvenience is inevitable in any new construction, our goal is to help manage neighbors' expectations and minimize the disruption and inconvenience to the maximum extent possible. We are happy to support the detailed construction management plan proposed by Wesley for this project and we encourage the Commission to include it as part of the Order in this case. We appreciate Wesley's willingness to engage with us and to incorporate many of the suggestions we made, especially in the last week. We believe the result is a plan that is good for Wesley and the neighbors.

We cannot, however, support the security plan that Wesley is proposing as part of this proceeding. The security plan submitted by Wesley focuses mostly on the new Landmark building and is intended to ensure the safety of the building's residents within the building. It is not a campus-wide security plan that addresses the changing nature of Wesley as a graduate-level seminary to a campus in which Wesley is used by a developer to house more than 600 undergraduates from another institution. It also does not address the safety challenges on a campus at a time when the world's problems are played out on university property. That requires a security plan that is forward-looking and campus-wide. The plan submitted by Wesley on October 24 in this case is incomplete and does not meet the challenge. It is not good for the neighbors and it is not good for Wesley or the students who will occupy the campus.

Although Wesley and our two groups have come close, we are not yet in agreement with Wesley's security plan that is now before this Commission. We pledge tonight to continue to work with Wesley prior to your deliberations in this case in hopes of reaching a better outcome for the neighbors and Wesley; and we hope that you will encourage Wesley to work with us on this issue prior to this case being decided.

Our sixth and final reason for opposition: we want to join with ANC 3E and the Committee of 100 in expressing our concern with Wesley's inadequate IZ proposal.

The \$8 million IZ offer by Wesley is insufficient. It is our understanding that the \$8 million contribution is based only on Landmark's hard construction costs, not the overall project costs. The IZ contribution should reflect the total project costs. In addition to hard costs, the IZ contribution should be based on land costs; design costs; soft costs, such as permitting, legal, survey, and Title costs; and financing costs.

Although we did not agree with its decision, the Commission delayed consideration of the IZ proposal in this case to Further Processing. That means Wesley has had more than enough time to

develop a consensus-driven IZ proposal. Wesley indicated in September it would convene a meeting of the CLC specifically to discuss IZ. That meeting was never held. We now realize this was probably the result of opposition to Wesley's initial IZ proposal from the Department of Housing and Community Development (DHCD). Wesley did not share that information with us. Most of us knew nothing about DHCD's view of Wesley's IZ proposal until the ANC 3E meeting on November 13. It was not until Wesley submitted its slides for its presentation in the record last Friday that it provided any information to the neighbors on its revised IZ proposal. What details we know come from the Office of Planning (OP) report for this hearing. DHCD's new proposal justifies a more thorough review of both Wesley's and DHCD's plans. We encourage the Commission to consider convening an additional hearing in this case specifically limited to IZ.

We want to publicly express our appreciation for ANC 3E's efforts on the IZ issue, especially given that the residents impacted by this case fall in a different ANC because of the last round of ANC gerrymandering that has cost several Ward 3 neighborhoods, including ours, meaningful representation at the ANC level.

Finally, Wesley's Further Processing application refers to the Standard at College Park, which was built, owned, and managed by Landmark. We have learned that this building is the subject of many online complaints from its residents, including concerns about noise stemming from excessive partying Thursday-Saturday, poor maintenance, poor construction, including thin walls that allow noise to travel from unit to unit – just to name a few. These complaints raise concerns about the quality of the product that Landmark will provide at the site – an issue that has not been addressed by Wesley in its Further Processing application.

Let me conclude this testimony by saying that we come to this hearing tonight **more** concerned and **more** chagrined by Wesley's long term prospects for viability in our neighborhood – and,

consequently, the viability of the Landmark building. Our goal over the last three years has not been to win a case; but rather to share the views of neighbors with you on a project in their neighborhood. Long after this case is decided, you will not be impacted by the decision you make; but neighbors will.

Thank you very much for this opportunity – yet again – to share these views with you.

ATTACHMENT A

**OCTOBER 20, 2025 WRITTEN RESPONSE
FROM WESLEY THEOLOGICAL SEMINARY
TO QUESTIONS FROM NEIGHBORS FOR
A LIVABLE COMMUNITY (NLC)/
SPRING VALLEY-WESLEY HEIGHTS
CITIZENS ASSOCIATION**

Wesley Responses

Following the recent CLC meeting and the filing of the new Comprehensive Transportation Review with the Zoning Commission and DDOT, Wesley received this list of follow up questions from several neighbors. Wesley is pleased to respond to these questions below which can be discussed further at the upcoming in person CLC meeting on Tuesday, October 21 at 6:30pm.

Gorove/Slade will be available to respond to any follow-up questions.

1. Did DDOT require the new CTR and parking study?

The updated CTR and associated parking study were requested by DDOT as part of Wesley Theological Seminary's Further Processing application.

2. Based on the CTR (Figure 4), Wesley does not intend for pedestrians to access the campus from the University Avenue driveway or the green space along University Avenue. Is this correct?

The purpose of this graphic is to demonstrate the anticipated primary circulation and access for vehicles, service/delivery trucks, pedestrians, and bicyclists. As there are existing sidewalks on Massachusetts Avenue that can safely and accessibly support pedestrian traffic to/from WTS, primary access to the new residential building is shown primarily from Massachusetts Avenue. However, pedestrian access is not currently prohibited in any way from University Avenue, and a sidewalk has been proposed as part of WTS's TDM plan on the east side of University Avenue to further support pedestrian access from University Avenue. This will be clarified in Figure 4.

3. Can you clarify the use of the WTS driveway. Pages 4 and 12 appear to be contradictory with Page 4 indicating unlimited use during non-peak periods and Page 12 suggesting University Avenue is closed for all traffic except delivery and emergency vehicles.

The intent is for the driveway on University Avenue to be closed at all times, except for service/delivery and emergency vehicles that are permitted to use the driveway. This will be clarified on page 4 of the CTR.

- a. Based on the CTR, there are no limits on the use of the University Avenue driveway for exiting the campus during non-peak hours. Is this correct? Our understanding was that the driveway would only be accessed by food service and emergency vehicles.

See response to Comment 3 above.

- b. If Wesley is only closing University Avenue during peak periods, what time are the peak periods? (At one point, the CTR makes reference to the peak PM period as being from 6 PM – 10 PM.)

See response to Comment 3 above.

4. What steps are being made to prevent any traffic during non-peak periods from turning left into the neighborhood or going straight to Sedgwick Street? Given the plans for new construction, are you prepared to install a “pork chop” at the University Avenue driveway to force vehicles to turn right toward Wesley Circle? (If the road is closed, as suggested on Page 4, we acknowledge a “pork chop” probably would not be necessary.)

See response to Comment 3 above. As the only vehicles using this driveway will be service/delivery and emergency vehicles, and since two-way access is permitted for food service deliveries through this driveway, a pork-chop is not recommended at this location.

5. Can you clarify the number of below grade parking spaces in the new building? Pages 1 and 13 say 264, but Pages 3 and 12 state 295.

Upon redevelopment, 31 surface parking spaces will be maintained, and an additional 264 parking spaces will be provided within the new below-grade garage. This yields a total of 295 parking spaces across the campus, 264 of which are located within the garage. This will be revised on page 12.

6. The CTR indicated on P. 13 that Wesley will have access to 108 parking spaces on campus. Will Wesley students faculty, staff living in the new Landmark housing be included in these 108 spaces or will they be expected to comprise part of the other 187 spaces available in the new building?

187 parking spaces will be available to all people residing in the building. 108 parking spaces will be available for WTS general use. This will be clarified in the CTR.

7. The CTR notes on Page 13 that the parking spaces in the new residential building are expected to function as “long-term vehicle storage,” thus minimizing the number of vehicle trips. What is the data source justifying this conclusion that students will not use their vehicles and the only need is for long term storage? But, would this same standard hold for faculty and staff residing in the building? Wouldn’t it be more likely that they would make more vehicle trips than students? And if not, what is Gorove Slade’s rationale? Even if they were to use their vehicle more often, would the number of trips be consequential? And, if the trips would not be consequential, what would be the rationale for that conclusion?

As stated in the CTR, the housing is intended for WTS and AU students, faculty, and staff only. Unlike typical commuters, individuals living on or in close proximity to the campus where they work or take classes will not need to drive to their place of work or to class. Rather, these “commuter” trips are likely walking or biking trips and are intended to be captured internally within the adjoining campuses. This said, the CTR still conservatively assumes that 20% of trips during peak hours will be done in a personal vehicle, and that trip patterns would follow that of a typical residential building. Outside of peak commuter periods, the campus is well supported by multimodal infrastructure that makes a car-lite lifestyle possible for both students and staff.

8. Is the purpose of the parking study’s examination of on-street parking occupancy to suggest that Wesley students should be able to park in the neighborhood? (If the on-street parking occupancy is as low as Gorove/Slade suggests, does that not indicate that the AU Good

Neighbor Parking policy and implementation has worked – and if these efforts have worked, why should Wesley students, faculty, and staff be permitted to park on neighborhood streets when AU students, faculty, and staff are not permitted by AU to do so?

The purpose of the study was to determine and document the existing occupancy of both WTS's onsite parking supply and the parking on the adjacent streets, as requested by DDOT. There is no intent to suggest that WTS students, faculty, or staff park on-street. The data from the parking study indicated that the 108 spaces on campus that are reserved for WTS use on campus will be sufficient to cover the existing and anticipated demand.

9. Gorove/Slade reported there are 564-603 on-street parking spaces available in the study area. Do they have a breakdown by street? And how did they make this determination? Was it by block and, if so, did they allow for driveway curb cuts or alley-way curb cuts in the study area.

A breakdown by street will be added to Technical Appendix B. The supply was determined by measuring each block face and subtracting areas where parking would be prohibited in accordance with DDOT guidelines, such as within 25 feet of an intersection or crosswalk, within the limits of curb cuts, in front of fire hydrants, or within areas that are otherwise signed as NO PARKING. From there, the usable length was divided by 22 feet, which is DDOT's standard length and accounts for both the length of a standard vehicle plus a small buffer between vehicles, to determine the number of vehicles that could feasibly park along a block face.

10. Will Wesley students, faculty, and staff residing in the building or using the parking facilities at the new building be charged the same as the AU students, faculty, and staff residing in the building? Will Wesley be paying the parking fees for its faculty and staff who will be commuting to campus? (We note that Page 14 states that free parking, validation, and discounted rates will not be offered. Our intent in asking this question is to ensure that there are no disincentives for Wesley commuters and all on-campus residents to use the on-campus parking facilities.)

All residents of the building will be charged the same amount for parking. Wesley commuting students, faculty and staff parking on campus will not be charged for parking.

11. Page 14 indicates that TDM reports will only go to goDCgo. Will you agree to provide these reports to the ANCs, the neighborhood associations, and the CLC? Yes.

Yes. The Performance Monitoring Reports will be shared with goDCgo and all other stakeholders.

12. Will you agree to make the new sidewalks along University Avenue permeable to limit the impact of stormwater run-off on the neighborhood?

Yes, subject to DDOT standards and approval.

13. We note that the multimodal trip generation data for the new residential building has changed from the CTR submitted in Z.C. Case No. 24-08(1); the total number of trips has been reduced across all modes. What is the explanation for this?

The trips associated with the development were calculated using the 12th Edition of the ITE Trip Generation Manual and ITE Land Use Code (LUC) 226 (Off-Campus Student Apartment, Mid-Rise, Adjacent to Campus). This differs from the previously approved CMP CTR, which used the 11th Edition of the ITE Trip Generation Manual and ITE Land Use Code 225 (Off-Campus Student Apartment, Low-Rise, Adjacent to Campus). The 12th Edition of the ITE Trip Generation Manual was published in August 2025, and per DDOT standards, the latest version of the manual was used. Furthermore, as the proposed residential building has seven (7) floors, this is considered a “mid-rise” building per ITE’s standards, and LUC 226 is the applicable land use. The trip generation estimates reflect the updated data as provided in the latest ITE Trip Generation Manual and the appropriate Land Use Code and associated trip generation rates.

14. Page 44 suggests the Level of Service has improved significantly at two locations that had failing levels of service in the CTR filed in Z.C. Case No 24-08(1): the Mass Avenue and Wesley Circle intersection and the Mass Ave and WTS Driveway. Gorove/Slade offers no explanation. But, this seems to reflect a stunning reduction in the Daily Driveway Volumes (Table 4, Page 28). We realize the data from Z.C. Case No. 24-08(1) came from old studies; but is this improvement a reflection of Wesley’s declining enrollment and a reduced human footprint?

No. Enrollment is increasing gradually, but fewer students, faculty and staff are required to come to campus as often with remote classes and work.

15. Page 51 notes that sidewalks along the south side of Mass. Avenue meet the width requirement of a lower intensity land use, but not its “applicable land use.” What is the “applicable land use” that Gorove/Slade is referencing in this statement?

Per DC zoning, the WTS property is considered a “high density residential or light commercial” land use type. In order to meet DDOT’s width requirements for streets bordering “high density residential or light commercial” land uses, the sidewalk unobstructed clear width should be 8 feet, the curb walk should be 1 foot, and the tree zone should be a minimum of 4 feet, yielding a total minimum sidewalk width of 13 feet (as shown in Table 12 in the CTR). While the overall width from the face of curb to the back of sidewalk appears to be 13 feet, the unobstructed clear width measures closer to 6 feet, which is less than the 8-foot required width. Thus, the existing sidewalk on the south side of Massachusetts Avenue is shown in Figure 27 as not meeting standards. The sidewalk would meet standards for a “low to moderate density residential” land use type.

16. Figure 27, Page 54 shows that most of the Spring Valley neighborhood within the CTR study area had no sidewalks. The CTR emphasizes that there is adequate sidewalk infrastructure on Mass. Avenue. Doesn’t the CTR demonstrate that Wesley pedestrians should be encouraged/incented to use Mass. Avenue rather than Spring Valley neighborhood streets where there is inadequate sidewalk infrastructure?

As demonstrated in Figure 27, there are no sidewalks on many of the streets west of the WTS campus. As part of the TDM plan that was agreed to as part of the 2022-2032 Campus Plan, WTS has agreed to fund and construct the following pedestrian improvements which would make access from the west side of campus safe and accessible:

A sidewalk along the east side of University Avenue NW between Massachusetts Avenue and Rodman Street, subject to DDOT approval, with a leadwalk into campus along at least one side of the site driveway;

1. Install signage, crosswalk and ADA curb ramps on the south leg of University Avenue at the Rodman Street intersection, subject to DDOT approval; and
2. 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.

This new infrastructure will provide safe and accessible access for all pedestrians along the east side of University Avenue, which is a public street, and will fill in an existing gap in connectivity between the sidewalk that runs along the south side of Rodman Street and Massachusetts Avenue. These improvements are not intended to exclusively serve WTS or to necessarily “encourage/incentivize” access to the campus from the west, but to provide much needed connectivity from the Spring Valley neighborhood to Massachusetts Avenue.

17. Is the CTR recommending on Page 63 that shared use path for bicyclists and pedestrians be created along Mass Avenue at Wesley Circle? This is the same area that Figure 27 shows is only 6 feet wide and does not conform to anything but “low to moderate density residential” use (Table 12, Page 51). The recommendation seems to conflict with the data collected for the CTR by Gorove/Slade.

The summary on page 63 misidentified the intersection, which was intended to be Massachusetts Avenue and Ward Circle, not Wesley Circle. This summary will be updated accordingly to discuss the protected bike lanes mentioned in the Safety Analysis section of the CTR.

18. How do non-delivery vehicles access and turn around in the drop-off zone?

Non-delivery vehicles will be required to turn around on campus and exit via the driveway on Massachusetts Avenue.

19. What allowances will be made for vehicle movement during move-in and move-out of the housing?

Move-ins and move-outs will be coordinated by WTS, and all activities will be accommodated on campus. Specifically, at the start and end of term, moving activities will be staggered throughout the day, and students will be assigned an enforced timeslot to reduce internal congestion. As all residential units within the building are furnished, move-in and move-out activities will not consist of large trucks but will occur primarily via personal vehicles.

20. During construction and prior to occupancy, where will Wesley students, on-campus resident, faculty, and staff park their vehicles?

Wesley is investigating nearby off-site parking locations and whether transportation to and from campus will be required.

21. Of the 215 dwelling units, what is the breakdown by bed number? (That is, how many 1-bed units; 2-bed units, 3-bed units, 4-bed units etc.)

The Plans have been revised to provide for 185 units with a total of 659 beds, with a unit mix breakdown.

- Studio: 7
- 1BR: 14
- 2BR: 34
- 3BR: 0
- 4BR: 80
- 5BR: 50

22. Will the 90 beds reserved for Wesley students be in any particular configuration of the building?

No. There will be no Wesley designated units.

23. Will Wesley's students not living in the new Landmark building have access to the building amenities?

Yes.

24. Will Wesley be submitting final drawings for the playground? Who will have access. How will they have access? Did you assess parking impacts? Who will be liable for any injuries at the playground?

The current playground plans are subject to neighborhood input before construction. Access will be from a path from the campus or a path for University Avenue.

It depends on the circumstances of any injuries, but the playground will be covered by Wesley's insurance coverage.

Finally, there are several items in the CLC PowerPoint and the CTR that raise additional questions. In discussing Wesley's proposed parking facilities, the CTR notes on Page 14 that school enrollment is "about 80 percent of the cap" when the parking utilization study was conducted on September 23. If the cap is based on Wesley's 715-student cap set in Z.C. Case No. 05-40A, this would mean that Wesley's enrollment is 572 students. If the cap is based on the 1,000-student cap set in Z.C. Case No. 24-08(1), this would mean Wesley's current enrollment is 800 students. Either way, these numbers seem inconsistent with the data presented in the CTR and Wesley's October 7 CLC PowerPoint concerning the current number of students on campus.

Additional information on how enrollment is calculated to be answered by WTS.

Page 28 of the CTR suggests very low traffic throughout the day. Page 3 of the October 7 PowerPoint shows a daily breakdown of students on campus that averages out to 50 students per day over a 4-day week – with a high of 88 on Tuesday and a low of 25 on Wednesday. Wesley is expected to use 90 beds in the new Landmark building, according to Page 13 of the CTR.

We think it is important for all of us to be clear on the numbers – although we recognize the Landmark building is not intended exclusively to house Wesley students, but to provide a means for Wesley to thrive. Therefore, we ask the following additional related questions:

Wesley has provided an updated Fall 2025 enrollment and employment history for degree and non-degree programs.

1. What is the enrollment of Masters students for Fall 2025?
248
2. What is the enrollment of Doctoral students for Fall 2025?
177
3. Are there other students that do not fit these categories and how many are enrolled in programs for Fall 2025? And would come to the campus?
D. Min and Course of Study students do not come to campus regularly and many never come to campus.
4. How many Masters students currently commute to the campus – that is, how many do not live in Wesley facilities on the Wesley campus?
181 Master’s students not living on campus live within commuting distance.
5. How many students are currently residing on the Wesley Campus?
Carroll Hall: 30 spaces occupied (4 families, 7 couples, 20 singles), including 9 AU students. 2-1 bedroom and 1–3-bedroom units are used for Wesley short-term visitors.
2014 Dorm: 30 spaces occupied (all singles), including 6 AU students. 8 beds became available after the beginning of the semester as a result of student attrition, campus relocations and withdrawals from housing and additional beds being returned to service after repairs. These units will provide short-term and hybrid week housing for the rest of the semester.
6. What is the total number of beds that are now occupied by Wesley students and their families on the Wesley campus?
See No. 5
7. Does Wesley realistically expect to utilize 90 beds in the new Landmark building?

Yes. The new and flexible housing will help attract and retain students and be competitive with other seminaries.

8. If Wesley is unable to fill the 90 beds in the Landmark building, is there an agreement with Landmark that would allow those unused Wesley beds to be used by AU students, faculty, or staff?

Beds not used by Wesley will be filled by Landmark. Wesley also has the ability to take more than 90 beds as needed.