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September 3, 2025

BY IZIS

Mr. Anthony J. Hood, Chairman
D.C. Zoning Commission
One Judiciary Square
441 4th Street, N.W.
Second Floor
Washington, D.C. 20001

Re: Response to NLC-SVWHCA's Reply to Motion to Supplement Application
for Further Processing of a Campus Plan (Z.C. Case No. 23-08A)
Application of The Wesley Theological Seminary of the United Methodist Church
4500 Massachusetts Avenue, N.W.
Square 1600, Lots 6 (818 and 819), 7, 8 and 9.

Dear Chairman Hood and Members of the Commission:

The Wesley Theological Seminary ("Wesley") respectfully submits this brief response to the NLC-SVWHCA's August 29, 2025 Reply to the Wesley Motion to Supplement the Further Processing Application. First, the Motion filed by the Applicant was entirely appropriate and in proper legal form. The purpose of the Motion was to request the Commission's permission to accept the late filing of the attached parking and loading memorandum previously demanded by NLC-SVWHCA and in so doing permit the continued processing of Wesley's August 8, 2025 accepted Further Processing application, including the scheduled and noticed November 24, 2025 hearing date. Second, the parking and loading memorandum included with Wesley's Motion meets the criteria quoted by NLC. It addresses demand based on Gorove Slade's expert analysis of comparable scenarios as well as the proposed supply of parking included in the new university housing. Debate on the parking and loading issues raised by NLC-SVWHCA are better left for the contested case hearing process.

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Finally, Wesley notes for the record that both NLC-SVWHCA's August 22¹ and August 29, 2025 filings were not properly served on the Applicant, the affected ANC 3D and ANC 3E, and the Office Planning. This has been typical of their filings in this matter to date. With at least thirty year's experience appearing before the Commission, NLC-SVWHCA is aware that the Rules of Practice and Procedure and common courtesy require timely and proper service on the established parties.

Wesley looks forward to presenting this application to the Zoning Commission at the November 24, 2025 public hearing date.

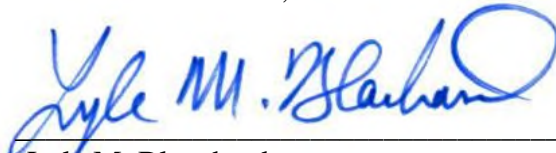
Thank you for continued assistance in this matter.

Very truly yours,

GREENSTEIN DELORME & LUCHS, P.C.



John Patrick Brown, Jr.



Lyle M. Blanchard

¹ By separate filing, Wesley will respond the numerous procedural objections raised by NLC-SVWHCA's August 22, 2025 filing.

CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2025, the foregoing Response to NLC-SVWHCA's Reply to Motion to Supplement Application was delivered via electronic mail to the following:

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