Government of the District of Columbia
Department of Transportation

d. Planning and Sustainability Division

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Meredith Soniat
Acting Associate Director MS

DATE: November 14, 2025

SUBJECT: ZC Case No. 23-08A –Wesley Theological Seminary Campus Plan Further Processing

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PROJECT SUMMARY

Wesley Theological Seminary of the United Methodist Church (the "Applicant") seeks approval of a Further Processing of its approved Campus Plan for the construction of the new university housing and related campus improvements. The current Wesley Theological Seminary (WTS) Campus Plan was approved by the Zoning Commission (ZC) in 2025 through ZC Case No. 23-08(1) for the period of 2022-2032.

The project will demolish existing student housing (comprising 90 beds), administration buildings, and a surface parking lot (displacing 143 existing spaces) and replace these facilities with a new dormitory with approximately 659 beds (in 185 units) and 264 underground parking spaces. The new dormitory will primarily house WTS and American University (AU) students.

SUMMARY OF DDOT REVIEW

The District Department of Transportation (DDOT) is committed to achieving an exceptional quality of life by encouraging sustainable travel practices, safer streets, and outstanding access to goods and services. To achieve this vision, DDOT works through the zoning process to ensure that impacts from new developments are manageable within and take advantage of the District's multi-modal transportation network and, as necessary, propose mitigations that are commensurate with the action. After an extensive review of the case materials submitted by the Applicant, DDOT finds:

- The proposal results in a net increase in intensity on campus by 569 dormitory beds and 121 parking spaces;
- The campus is missing sidewalk, curb ramps, crosswalks, and leadwalk along the east side of University Avenue NW. To improve pedestrian connectivity and access to the campus the Applicant has committed installing these missing pedestrian facilities and wayfinding signage;

- The October 24, 2025, Comprehensive Transportation Review (CTR) study (collectively, Exhibits 17A1, 17A2, and 17A3) indicated that none of the study intersections met DDOT's delay-related threshold for mitigation;
- The CTR also included an on-street parking analysis for the surrounding residential neighborhood that indicated the on-street parking occupancy rate does not exceed 29% in the study area; and
- The CTR did not recommend modifications to the existing TDM Plan and Performance Monitoring Plan (PMP) included in the WTS Campus Plan approved in 2025 through ZC Case No. 23-08(1) for the period of 2022-2032.

RECOMMENDATION

DDOT has no objection to the approval of this Further Processing application on the condition that the 19-dock Capital Bikeshare station and scooter corral noted in the TDM Plan for the approved 2022-2032 WTS Campus Plan be installed in conjunction with this project, prior to issuance of a certificate of occupancy.

CONTINUED COORDINATION

Given the complexity and size of the Campus Plan, the Applicant is expected to continue to work with DDOT on the following matters outside of the zoning process:

- Public space, including curb and gutter, street trees and landscaping, street lights, sidewalks, curb ramps, and other features within the public rights of way, are expected to be designed and built to DDOT standards;
- The Applicant will be required to obtain public space permits for all elements of the project proposed in public space. DDOT comments on the Applicant's initial public space design are noted later in the Streetscape and Public Realm section and can be resolved during the public space permitting process;
- The Applicant should participate in a Preliminary Design Review Meeting (PDRM) to discuss the public space design with DDOT and the Office of Planning (OP);
- The Applicant should submit a detailed curbside management and signage plan for review by the Curbside Management Division (CMD), consistent with current DDOT policies. If parking meter installation is required, this will be at the Applicant's expense;
- The Applicant should coordinate with DDOT's Transportation Demand Management (TDM) team and goDCgo regarding the implementation of the campus TDM and PMP programs. Submit future performance monitoring reports to the TDM Team for review, concurrence, and adjustment;
- The Applicant should coordinate with DDOT's Urban Forestry Division (UFD) and the Ward 3 Arborist regarding the preservation and protection of existing small street trees, as well as the planting of new street trees, in bioretention facilities or a typical expanded tree planting space; and
- The Applicant should coordinate with DDOT's Planning and Sustainability Division (PSD) on bike parking and scooter corral design and installation of the 19-dock Capital Bikeshare station.

TRANSPORTATION ANALYSIS

The following is DDOT's review of the submitted plans, application materials, CTR study, and approved WTS Campus Plan to assess the project's consistency with the District's vision for an equitable and sustainable transportation system that delivers safe and convenient ways to move people, goods, and services.

Site Access

Per the approved WTS Campus Plan, the site will be accessed by vehicles mainly through existing curb cuts on University Avenue and Massachusetts Avenue NW. No vehicle access changes are proposed but internal circulation will be refined and improved.

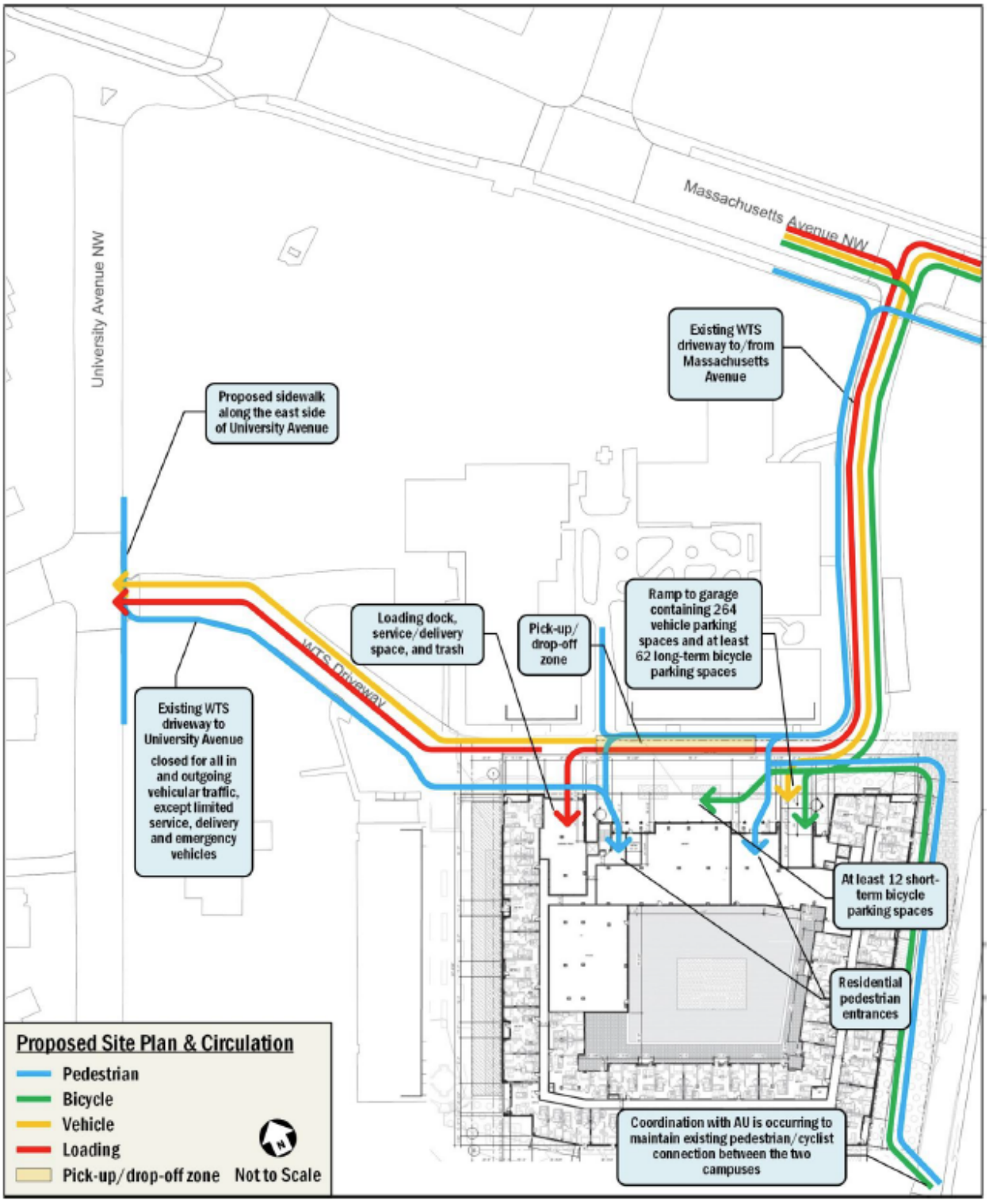
Pedestrian access is also mainly provided from Massachusetts Avenue as there is no sidewalk on University Avenue. In the TDM Plan for the approved WTS Campus Plan, the Applicant has committed to installing the missing sidewalk along University Avenue, the missing ADA facilities with a leadwalk into campus, and wayfinding signage on-site for residents seeking to walk to AU campus. Figure 1, below shows the proposed site circulation.

Loading

DDOT's practice is to accommodate vehicle loading in a safe and efficient manner, while at the same time preserving safety across non-vehicle modes and limiting any hindrance to traffic operations. For new developments, DDOT requires that loading take place in private space and that no back-up maneuvers occur in the public realm. Access to this building for loading and unloading, delivery and trash pick-up is an important consideration, and DDOT expects the project to comply with DDOT's standards for loading.

Per Title 11 of the *District of Columbia Municipal Regulations* (*DCMR)*, Subtitle C § 901.1, residential properties with more than 50 units are required to provide one (1) loading berth and one (1) 20-foot delivery space. The project proposes to meet the zoning requirements and practical needs for loading by providing a one (1) 30-foot berth and one (1) 20-foot service/delivery space in the new building.

Figure 1 | Proposed Site Circulation



Source: Gorove Slade 10/24/25 CTR, Figure 4

Vehicle Parking

The overall parking demand created by the development is primarily a function of land use, development square footage, price, and supply of parking spaces. However, in urban areas, other factors contribute to the demand for parking, such as the availability of high-quality transit, frequency of transit service, proximity to transit, connectivity of bicycle and pedestrian facilities within the vicinity of the development, demographic composition, and other characteristics.

The project is required by zoning to provide 61 vehicle parking spaces. There are currently 174 vehicle parking spaces located on the WTS campus that are used by students, faculty, staff, and visitors. The project proposes to remove 143 surface parking spaces, leaving 31 surface spaces, and construct a parking garage containing 264 parking spaces. The net change in parking as a result of the project is therefore 121 additional spaces for a total of 295 spaces on campus. This amount of parking exceeds DDOT's preferred maximum parking rates in the May 2024 *Guidance for Comprehensive Transportation Review* but is consistent with the approved WTS Campus Plan.

Bicycle Parking

The project is required by zoning to provide 56 long- and nine (9) short-term bicycle parking spaces for 185 residential units. The Applicant is proposing to provide 62 long- and 12 short-term bicycle parking spaces, exceeding the zoning requirements, which is included in the TDM Plan for the approved WTS Campus Plan.

As the design of the long-term bicycle storage room moves forward, the Applicant should refer to page F-9 of Appendix F in the *Guidance for Comprehensive Transportation Review* for design best practices. The storage room must be designed so that a minimum of 50% of long-term spaces are located horizontally on the floor or bottom of a two-tier rack system, 10% of spaces are served by electrical outlets, 5% of spaces (minimum 2 spaces) are designed for larger tandem/cargo bikes (10 feet by 3 feet, rather than 6 feet by 2 feet).

Streetscape and Public Realm

In line with District policy and practice, any substantial new building development or renovation is expected to rehabilitate streetscape infrastructure between the curb and the property lines. This includes curbs and gutters, street trees and landscaping, streetlights, sidewalks, and other appropriate features within the public rights of way bordering the site.

The Applicant must work closely with DDOT and the OP to ensure that the design of the public realm meets current standards and will substantially upgrade the appearance and functionality of the streetscape for public users needing to access the property or circulate around it. In conjunction with Titles 11, 12A, and 24 of the DCMR, DDOT's most recent version of the *Design and Engineering Manual (DEM)* and the *Public Realm Design Manual* will serve as the main public realm references for the Applicant.

While the preliminary public space plans shown on the Applicant's Civil Engineering Plans (Exhibit 16C), are generally consistent with DDOT standards, there are several considerations that need to be reviewed in greater detail during the public space permitting process:

- All vehicular site access to the site, as well as loading facilities and trash pick-up, must be from the exsting private driveway network via Massachusetts Avenue and University Avenue NW;
- At the driveway entrance at University Avenue, a sight distance analysis should be conducted to ensure that drivers have an unobstructed view of conflicting vehicles and pedestrians;
- The Applicant should submit a detailed curbside management plan with proposed signage for review and approval by CMD. If CMD requires multi-space meters for the remainder of the frontage, they will be at the Applicant's expense;
- The Applicant should provide a plan showing the detailed design of the long-term bike storage rooms, so PSD can confirm it meets the requirements in Titles 11 and 18 of the *DCMR* and DDOT *Bike Parking Guide* best practices, including larger cargo/tandem spaces; and
- Final locations are to be determined for the Capital Bikeshare station and inverted-U bicycle racks.

DDOT staff will be available to provide additional guidance during Further Processing and public space permitting and encourages the Applicant to participate in a Preliminary Design Review Meeting (PDRM) to address design-related comments provided by DDOT and OP.

Heritage and Special Trees

According to the District's Tree Size Estimator map, the property and fronting streetscape have several Heritage and Special trees. DDOT expects the Applicant to coordinate with the Ward 3 Arborist regarding the preservation and protection of existing Heritage, Special, small street trees, as well as the planting of new street trees, in bioretention facilities or a typical expanded tree planting space.

Heritage Trees have a circumference of 100 inches or more and are protected by the Tree Canopy Protection Amendment Act of 2016. With approval by the Mayor and UFD, Heritage Trees might be permitted to be relocated. As such, the Applicant may be required to redesign the site plan to preserve the Non-Hazardous Heritage Trees. Special Trees are between 44 inches and 99.99 inches in circumference. Special Trees may be removed with a permit. However, if a Special Tree is designated to remain by UFD, a Tree Protection Plan (TPP) will be required.

Mode Split and Trip Generation

Each trip a person makes is by a certain means of travel, such as vehicle, bicycle, walking, and transit. The means of travel is referred to as a 'mode' of transportation. A variety of elements impact the mode of travel, including density of development, diversity of land use, completeness of pedestrian network, proximity to transit options, availability and cost of vehicle parking, among many others.

The CTR provided trip generation estimates for 569 beds using land use category #226 (Off-Campus Student Apartment) from the *ITE Trip Generation Manual, 12th Edition*. The trip generation estimates are shown in Figure 2 below.

Figure 2 | Multi-Modal Trip Generation

Mode	Mode Split	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Auto (veh/hr)	20%	3	5	8	11	13	24
Transit (ppl/hr)	50%	11	13	24	33	37	70
Bike (ppl/hr)	5%	1	1	2	3	4	7
Walk (ppl/hr)	25%	5	7	12	17	18	35

Source: Gorove Slade 10/24/25 CTR, Table 3

The above trip generation applies only during the AM and PM commuter peak hours for the proposed residential (569 net new beds) component of the project. The project's parking facility will also serve general campus trips in addition to residents and staff, much of which will occur outside of the commuter peak periods. These existing vehicular campus trips, based on turning movement counts at the site driveways, are presented in Figure 3 alongside the project-generated trips.

Figure 3 | Existing Versus Proposed Trip Generation

Scenario	AM Peak Hour			PM Peak Hour		
	In	Out	Total	In	Out	Total
Current Campus Trips (From 2025 Counts)	15 veh/hr	3 veh/hr	18 veh/hr	21 veh/hr	7 veh/hr	28 veh/hr
Proposed Development Site Trips	3 veh/hr	5 veh/hr	8 veh/hr	11 veh/hr	13 veh/hr	24 veh/hr
Total Proposed Campus Trips	18 veh/hr	8 veh/hr	26 veh/hr	32 veh/hr	20 veh/hr	52 veh/hr

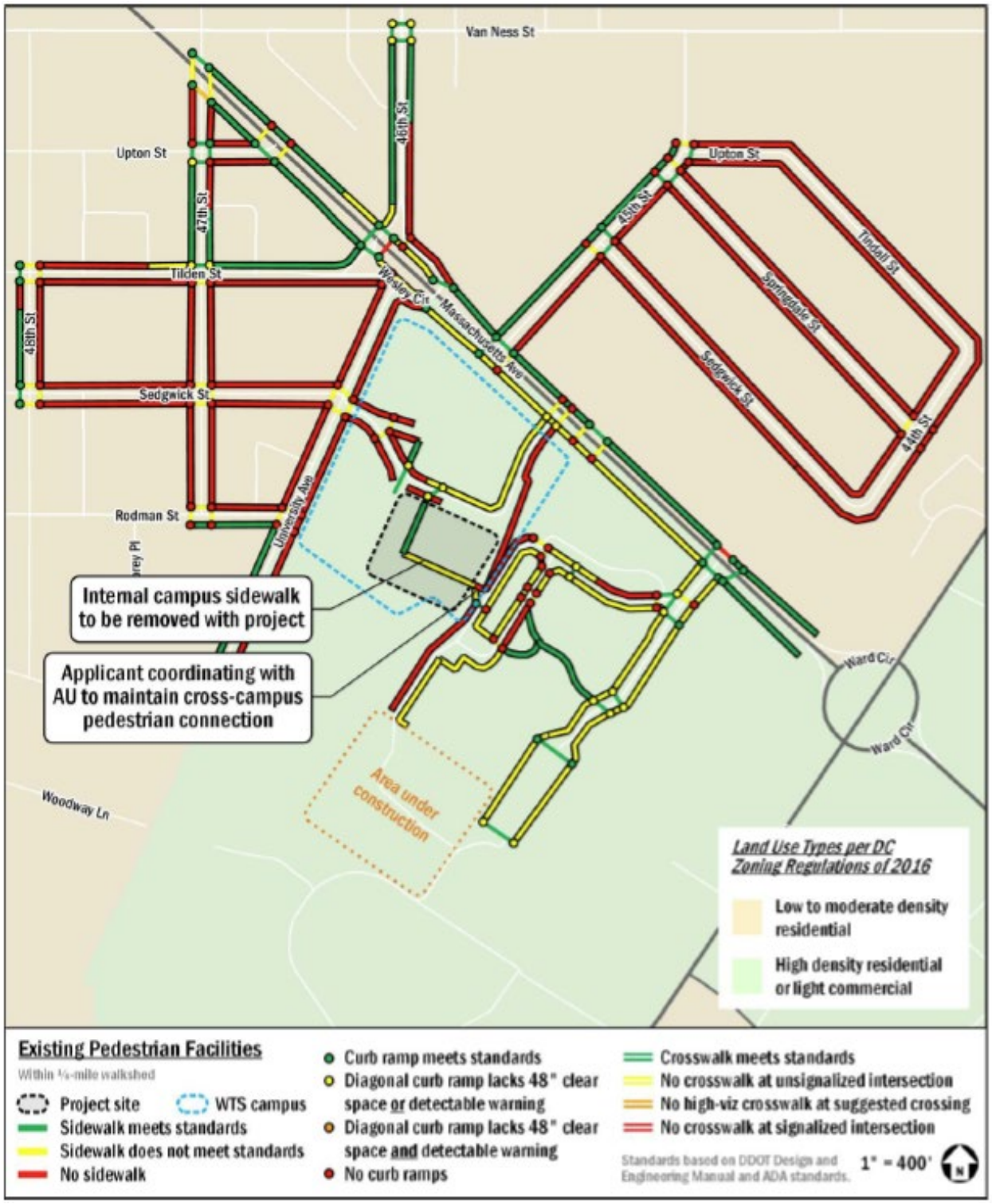
Source: Gorove Slade 10/24/25 CTR, Table 4

Pedestrian Network

The District of Columbia is committed to enhance pedestrian accessibility by ensuring consistent investment in pedestrian infrastructure on the part of both the public and private sectors. DDOT expects new developments to serve the needs of all trips they generate, including pedestrian trips. Walking is expected to be an important mode of transportation for this development. As such, DDOT requested the Applicant provide an inventory of the current pedestrian network conditions surrounding the site and a circulation analysis internal to the campus.

The Applicant's inventory of the pedestrian infrastructure in the vicinity of the campus, as shown in Figure 4, below, demonstrates that there are significant missing connections in the study area, particularly along University Avenue. To help offset the projected increase in traffic volumes and to encourage non-automotive travel to and from the site, in the TDM Plan for the approved WTS Campus Plan, the Applicant has committed to installing the missing sidewalk along University Avenue, the missing ADA facilities with a leadwalk into campus, and wayfinding signage on-site for residents seeking to walk to AU campus.

Figure 4 | Existing Pedetrian Facilities



Source: Gorove Slade 10/24/25 CTR, Figure 27

Bicycle Network

The District is committed to enhancing bicycle accessibility by ensuring consistent investment in bicycle infrastructure on the part of both the public and private sectors. DDOT expects new developments to serve the needs of all trips they generate, including bicycling trips. Bicycling is expected to be an important mode of transportation for this project.

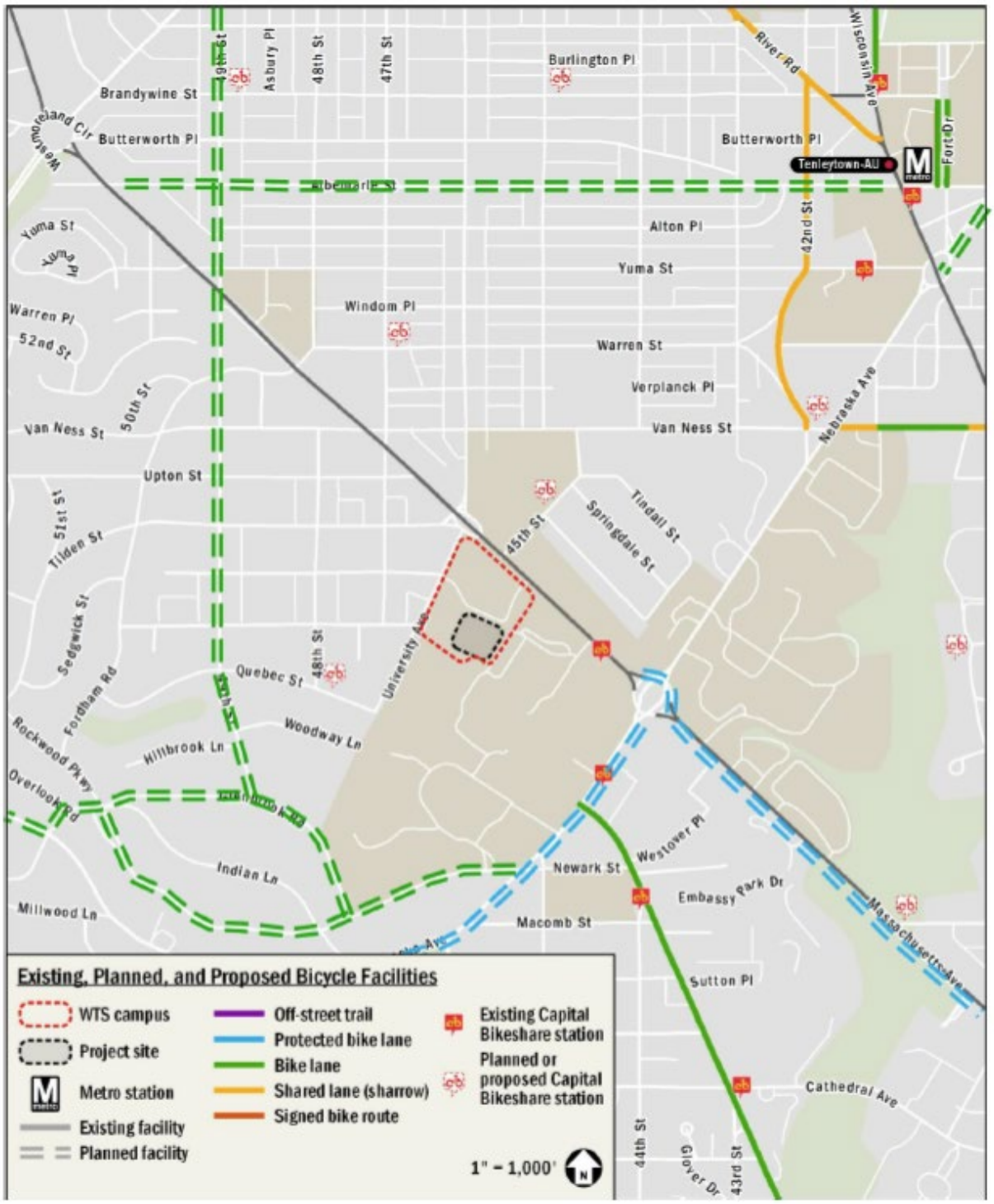
As shown in Figure 5, below, there is only one bicycle lane and no trails within ½ mile of the site; however, there are planned facilities in the future. There is one (1) 19-dock Capital Bikeshare station located approximately two (2) blocks from campus. In the TDM Plan for the approved WTS Campus Plan, the Applicant has committed to fund and install a 19-dock Capital Bikeshare (CaBi) station with 12 bikes on the campus, or at a location to be selected by DDOT, fund one-year of maintenance and operations costs, and fund and install one scooter corral near the library.

Transit Service

The District and Washington Metropolitan Area Transit Authority (WMATA) have partnered to provide extensive public transit service in the District of Columbia. DDOT's vision is to leverage this investment to increase the share of non-automotive travel modes so that economic development opportunities increase with minimal infrastructure investment.

The site is located with access to three (3) Metrobus Routes that provides service to the Tenleytown-AU Metrorail Station, approximately 1 mile away. Additionally, the site has access to two (2) AU shuttle routes with service to the Tenleytown-AU Metrorail Station, which WTS students can ride for free.

Figure 5 | Existing, Planned, and Proposed Bicycle Facilities



Source: Gorove Slade 10/24/25 CTR, Figure 30

Figure 6 | Existing Transit Facilities

Source: Gorove Slade 10/24/25 CTR, Figure 25

Curbside Management

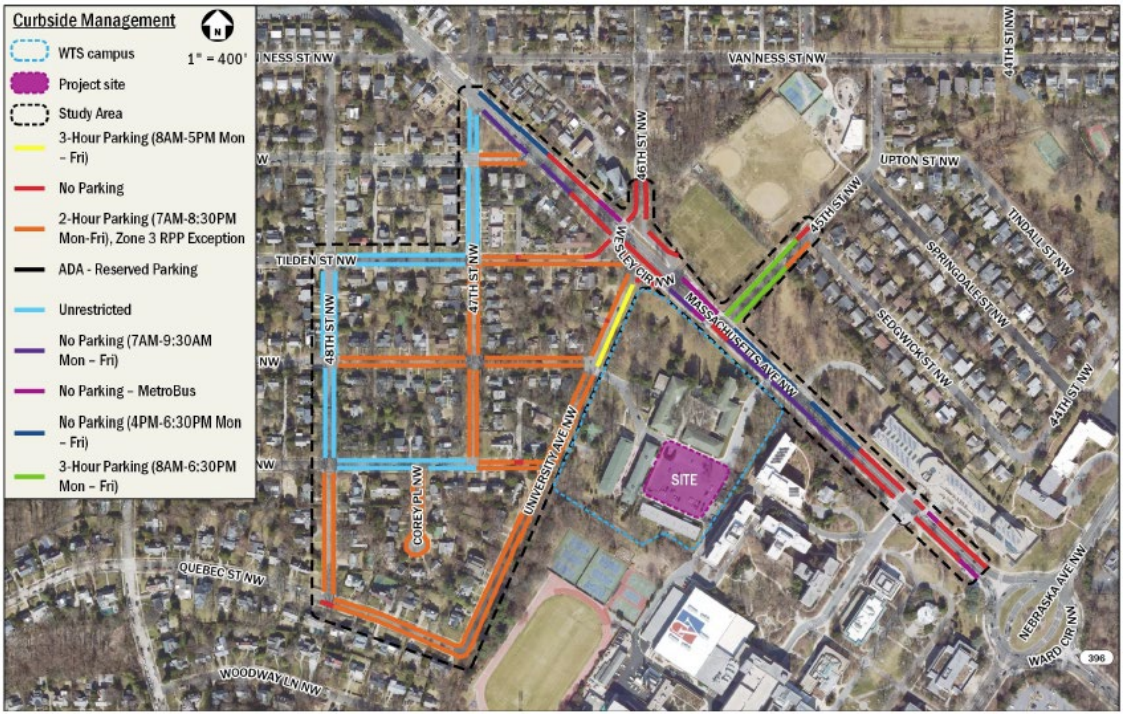
When a property redevelops, it is DDOT policy to reevaluate the existing curbside restrictions around the site frontages to ensure they align with the new land use(s) to occupy the property, as well as the surrounding neighborhood context.

Curbside designations around the site are shown in Figure 7, below. The curbside designation of the streets located in the residential neighborhood to the west of the campus are mainly signed for two-hour and three-hour Restricted Parking with Zone 3 Resident Parking Permit (RPP) Exceptions. Portions of 48th Street NW, Tilden Street NW, 47th Street NW, and Rodman Street NW provide unrestricted parking within the study area. Massachusetts Avenue NW is signed to restrict parking during the morning (7:00 a.m. - 9:30 a.m.) and afternoon (4:00 p.m. - 6:30 p.m.) peak hours in the peak directions. There is also substantial curbside space restricting parking in MetroBus Zones.

As part of the CTR, the Applicant performed detailed counts of vehicle parking on-street in the surrounding neighborhood (within a two-block radius) and on-site in the existing surface lots. The on-street parking occupancy rate did not exceed 29% in the study area while the on-site parking occupancy rate peaked at 33% across all study periods. The study concluded there is ample available on-street parking and sufficient on-site parking to accommodate WTS needs.

The Applicant has not proposed any changes to the curbside desinations with this project. DDOT is generally supportive of this concept; however, if any changes area proposed, a detailed curbside and signage plan must be submitted during public space permitting for review and approval by CMD. At that time, the plan may be refined by CMD, and the exact signage placards would be determined. If multi-space meters are required by CMD, these would be at the Applicant's expense.

Figure 7 | Curbside Designations



Source: Gorove Slade 10/24/25 CTR, Figure 5

Traffic Impact Analysis (TIA)

DDOT aims to provide a safe and efficient roadway network that provides for the timely movement of people, goods, and services. As part of the evaluation of travel demand generated by the site, DDOT requests analysis of traffic conditions for the agreed upon study intersections for the current year and after the facility opens both with and without the site development or any transportation changes.

To determine the proposed development's impacts on the transportation network, the Applicant completed a Traffic Impact Analysis (TIA) as a component of the CTR which includes an extensive analysis of existing conditions (2025 Existing), future with no development (2029 Background) and future conditions with development (2029 Future) scenarios.

Background Developments and Regional Growth

DDOT required the CTR to account for future growth in traffic on the network or what is referred to as background growth. Background growth is made up of local traffic growth from approved but not constructed nearby land development projects and regional traffic growth further away from the site based on forecasts from the Metropolitan Washington Council of Governments regional travel demand model.

The Applicant coordinated with DDOT on the appropriate background developments to include in the analysis. Traffic from one (1) specific future project (the "Ladybird" development comprising 219 residential units and a 13,000-square-foot grocer) was accounted for as a background development anticipated to be constructed and open by 2029. The Applicant also coordinated with DDOT on an appropriate method for considering regional growth. Annually compounding background regional growth rates of between 0.10% and 2% were assumed in the study area, differing based on roadway and peak hour.

DDOT also requires applicants to consider future changes to the roadway network. It was determined in coordination with DDOT staff that no major changes to the local transportation network are anticipated before 2029.

Study Area and Data Collection

The Applicant in conjunction with DDOT identified seven (7) existing intersections (including the site driveways) where detailed vehicle counts would be collected and a level of service analysis would be performed. These intersections are immediately adjacent to the site and include intersections radially outward from the site with the greatest potential to see impacts in vehicle delay. DDOT acknowledges that not all affected intersections are included in the study area and there will be intersections outside of the study area which would realize new trips. However, DDOT expects minimal to no increase in delay outside the study area as a result of the proposed action.

The Applicant collected weekday intersection traffic count data on Thursday, September 11, 2025. Traffic impact analysis focused on the weekday morning and evening commuter peak periods where the combined site traffic and adjacent roadway volumes were likely to be higher.

Results of Roadway Capacity Analysis

The roadway capacity analysis provided in the CTR demonstrated that none of the study intersections triggered DDOT's threshold for mitigation[1].

DDOT concurs with this conclusion and recommends the Applicant implement implement the TDM Plan with performance monitoring included in the approved WTS Campus Plan.

MS:eo

[1] The narrative on page 29 notes that traffic movements at two (2) study intersections exceed the storage length, while the queuing summary in Table 9 notes that all queues at intersections are contained within the storage length. Gorove Slade confirmed via email on November 12, 2025, that the narrative included an error and Table 9 provides accurate analysis results that all queues are accommodated by the storage length.