

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Maxine Brown-Roberts, Development Review Specialist
Joel Lawson, Associate Director, Development Review

DATE: November 14, 2025

SUBJECT: **ZC 23-08A** - Hearing Report for the Wesley Theological Seminary of The United Methodist Church Campus Plan, 2025-2035 – Further Processing

I. SUMMARY RECOMMENDATION

The Office of Planning (OP) recommends **APPROVAL** of the requested further processing application for the new dormitory and the campus improvements with the conditions, pursuant to Subtitle X § 101.

Wesley Theological Seminary of The United Methodist Church (Wesley, the Seminary or Applicant) has submitted a request for special exception review, pursuant to Subtitle X § 101, for further processing to construct new University Housing (dormitory) for Wesley and American University (AU) students, faculty, and staff as well as related campus improvements as shown in the approved Wesley Theological Seminary of The United Methodist Church Campus Plan to Thrive in Place, 2025-2035¹ (Campus Plan) (ZC 24-08(1)). Because the new dorm would serve students from Wesley as well as the adjacent American University Campus, a determination was made that Inclusionary Zoning (IZ) would apply, as the exemption from IZ for university campus dorms applies only to dorms for students of that university.

However, at the same time, the IZ program is not established to administer IZ units in exclusively student housing projects. Due to this unusual circumstances, Wesley filed a text amendment and demonstrated that providing IZ units on-site or off-site would be a hardship to the University. The Zoning Commission (ZC) approved the text amendment (ZC Order 24-09) to exempt Wesley from providing on-site IZ units and instead allows for their provision off-site. Further, the amendment allowed Wesley to waive the off-site requirements if the requirement can be met by alternate means.

To this end, Wesley has proffered a donation of eight million dollars (\$8 million) to provide IZ units within Ward 3. The implementation of providing the off-site units from the donation has gone through several reiterations and there have been many discussions between Wesley, ANC-3E, ANC-3D and community organizations as well as between Wesley, OP and the Department of Housing and Community Development (DHCD) regarding how to structure and administer the donation. The latest proposal is that the donation be made to the DHCD, who would administer the program, purchase the units and disseminate the units to qualified families.

¹ The Zoning Commission took Final Action to approve the 2025 Campus Plan on July 31, 2025, but the ZC Order with an effective date has not been released at this time.

OP is also proposing that the ZC allow a text amendment to be filed to allow DHCD the option for some of the units to be provided in buildings that are not new construction, to allow possibility of using the funds to convert existing residential to either affordable rental or homeownership opportunities.

The full details of the plan are enumerated in Section VII.

The new dormitory and campus improvements would not be inconsistent with the recommendations of the Comprehensive Plan Future Land Use Map (FLUM) for institutional use, and with the Generalized Policy Map (GPM) designation of the surrounding area for neighborhood conservation. Additionally, the proposal would be not inconsistent with many of the policies and actions of the Comp Plan Citywide Elements and the specific recommendations for the Rock Creek West Area Element.

The proposal also would not be inconsistent with the approved Campus Plan and is not likely to become objectionable to neighboring properties.

OP recommends the following conditions, in addition to ones recommended by DDOT and/or DOEE.

1. To meet their off-site IZ requirement, Wesley shall provide to the Department of Housing and Community Development (DHCD) \$8 million to deliver a minimum of 22,436 net square feet of affordable housing;
2. The affordable units shall be:
 - At 60% MFI for rental or 80% MFI for homeownership units;
 - Set aside for the life of the project; and
 - Located in Ward 3.
3. DHCD shall have the option to use any of the following methods to generate the affordable units:
 - DHCD's preferred option is the creation of a home purchase assistance fund available to low-income purchasers who want to buy an existing dwelling unit in Ward 3. Affordable ownership opportunities in Ward 3 are even more scarce than affordable rental properties. The funds would be available via lottery to households earning 80% MFI or less, who have received a Home Purchase Assistance Program (HPAP) notice to proceed. The funds would then be used to supplement the HPAP award toward the purchase of a home in Ward 3. In addition to the Fund, DHCD would seek a first mortgage lending partner such as the DC Housing Finance Agency (HFA). A covenant would be placed on the property requiring long-term price controls comparable with the IZ price schedule. Long term price controls would also enable reduced property tax assessment through the Office of Tax Assessments (OTA).
 - New construction of either affordable rental or ownership housing. This approach would include merging the funds with applications for DHCD's Housing Production Trust Fund, Low-Income Housing Tax Credits and other DHCD sources. This approach reduces the burden on DHCD's other sources and enables DHCD to finance more affordable units overall.

- Conversion of existing housing to long-term affordable rental or ownership housing. This approach would include funding the acquisition of existing properties or refinancing of existing debt in order to convert the properties into long-term affordable housing. There are several properties that could potentially benefit from this approach.
 - Each approach would be enforced by covenants.
4. Wesley shall provide to DHCD a the first four million dollars (\$4 million) minimum no later than the issuance of permits or two years from the date of the order.
 5. DHCD shall provide a written report to the Zoning Commission on the progress the fund makes in meeting the 22,436 square feet requirement within forty-five (45) days after the one year anniversary of DHCD having received the funds and each year after that until the funds are expended..
 6. Flexibility to vary the unit mix by bedrooms needed to meet the 22,436 net square feet.
 7. Flexibility to vary the unit mix in the dormitory provided there be no more than 659 beds.

II. APPLICATION-IN-BRIEF

Table 1

Proposal	Further Processing for the construction of the new dormitory and other campus improvements based on the Wesley Theological Seminary of The United Methodist Church Campus Plan to Thrive in Place 2025-2035
Location	4500 Massachusetts Avenue, N.W.
Legal	Square 1600, Lots 6 (A&T Lots 818, 819), 7, 8 and 9
ANC	Ward 3, ANC-3E
Zoning	RA-1, moderate density residential; a University Campus is a permitted use by special exception, including dormitories for use by students of that university.
Site	381,787 square feet (8.78 acres)
Building Area	387,040 square feet

The following are the elements for further processing as submitted by Wesley:

- Demolish the Old President’s House and restore the site with landscaping and a neighborhood playground;
- Demolish the Carroll and Straughn Halls, maintenance building, and surface parking lot;
- Construct new university housing for Wesley and American University students, faculty, and staff;
- Enhance open space with additional landscaping plan;
- Construct Public Space Improvements;
- Provide a Traffic Demand Management (TDM) Plan and Performance Monitoring Plan;
- Provide a Campus Security Plan;
- Provide a Construction Management Plan; and

- The funding of the Rock Creek West Affordable Housing Fund program to be administered by the District Department of Housing and Community Development (DHCD) – this replaced the establishment and funding of a Ward 3 Inclusionary Zoning Fund to be administered by Local Initiatives Support Corporation (LISC) with appropriate and enforceable monitoring mechanisms.

Wesley also provided additional information and update on their cooperation with American University.

III. SITE AND SURROUNDINGS AREA DESCRIPTION

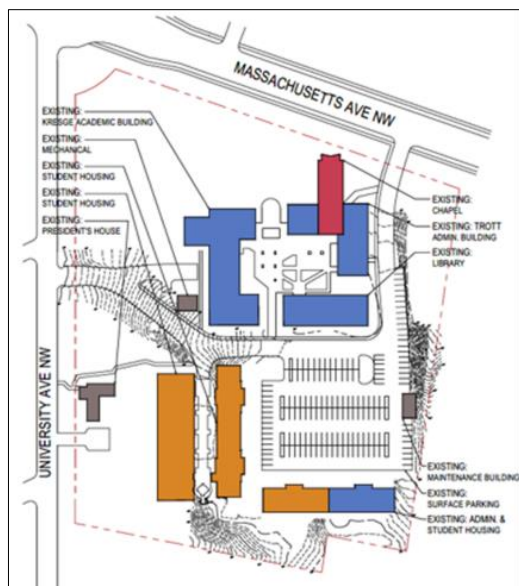
The Wesley Campus is located at 4500 Massachusetts Avenue, N.W. It is in the northwest area of Washington, just north and west of the intersection of Massachusetts and Nebraska Avenues at Wesley Circle. The 8.78 acre campus is essentially diamond-shaped and bounded by the arterial Massachusetts Avenue on the northeast, The American University's (AU) main campus on the southeast and southwest, and University Avenue on the northwest side. The proposed dormitory would be located on the southeastern portion of the campus.

AU's high-rise dormitories and playing fields are adjacent to the southeastern and southwestern sides of the campus. There are single-family houses to the northeast, across and well set-back from Massachusetts Avenue. The more proximate residential area is a single-family detached neighborhood on the campus' northwestern side, down-hill and across University Avenue from the campus existing and proposed buildings.

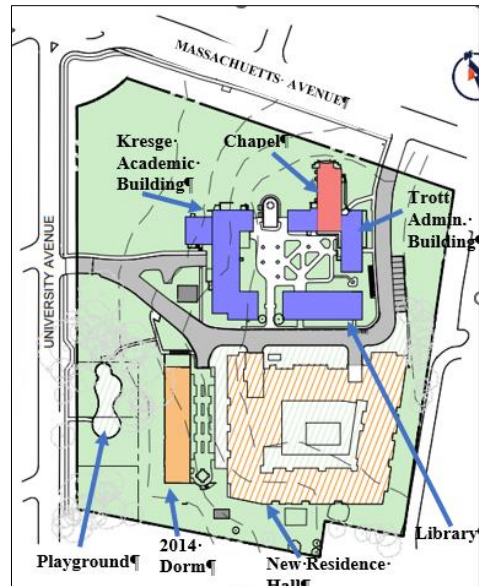
IV. 2025-2035 CAMPUS PLAN

The 2025-2035 Campus Plan, ZC 23-08(1), approved July 31, 2025, identified that the main change from the 2021 Campus Plan would be the construction of a new dormitory and a neighborhood park. To accommodate the new facilities, several buildings would be demolished as shown in Figure 1 below:

Figure 1 2021 Campus Plan



2025-2035 Campus Plan



Wesley seeks to develop an enhanced revenue source in the form of a new student residence hall that would serve Wesley and AU students, faculty and staff. It is the intent of Wesley to provide a 99 years lease over the land now occupied by Straughn and Carroll dormitories and the parking lot between them to Landmark Properties, a private company with experience in developing apartment-type student dormitories. Landmark would be responsible for demolishing the existing dormitory and parking lot and constructing and managing the dormitory.

Table 3 below shows the approved Campus Plan recommendations:

Table 3

2025-2035 Campus Recommendations					
Building	Use	Existing SF	Proposed SF	Existing Beds	Proposed Beds
Straughn Hall	Dormitory	29,866	To be demolished	~45	--
Carroll Hall	Dormitory	27,533	To be demolished	~ 45	--
Old President House	Storage	4,538	To be demolished	--	--
Library	Academic	16,630	16,630	--	--
Trott Hall / Chapel	Academic/ Religious	26,335	26,335	--	--
Kresge	Academic	32,819	32,819	--	--
2014 Dormitory	Dormitory	29,195	29,195	76	76
Proposed New Dormitory	Dormitory	--	282,061	--	659 (215 units)
Total Beds	--	--	--	166	735
Total SF	--	166,916	387,040	--	--
FAR (RA-1 permits 1.8)	--	0.44	1.017	--	--

V. FURTHER PROCESSING PROPOSAL

Demolitions

To accommodate the new dormitory, Carroll Hall, Straughn Hall, and the adjacent 143 space parking would be demolished.

The Old President's House and associated paved parking area located along University Avenue, and University Avenue curb cut would be demolished and redeveloped with a community playground and green area along University Avenue.

New Dormitory

The Campus Plan identified and demonstrated the necessity for the new dormitory, with heights and densities that correspond to the surrounding built environment, setbacks, buffers, and design considerations that should effectively mitigate any potential adverse impacts.

In the Campus Plan, the new dormitory was proposed to have a building size of 282,061 square feet with 215 units. In this further processing application, the size of the dormitory has been reduced

slightly to 281,911 square feet and 185 units. The maximum number of beds would remain at 659. The proposed dormitory would be as follows:

Table 4

Dormitory Site Area	113,758 square feet
Building Size	Approximately 281,911 square feet
Height	74.6 feet high or 7 stories
FAR	2.47 (1.013 for the overall site)
Units	185 units or 659 beds
Unit types	The co-living units would be as follows: <ul style="list-style-type: none">• Studio – 7 units• 1 bedroom – 14 units• 2 bedroom - 34 units• 3 bedrooms - 0 units• 4 bedrooms – 80 units• 5 bedrooms – 50 units
Parking	A two-level below grade parking garage with 264 spaces. 77 of the spaces would be for Wesley’s exclusive use, with the remainder used by residents of the dormitory, and others on the campus. There would also be 31 on-site street parking spaces.
Amenities	Study areas with group and individual spaces, a computer lounge, activity club room, and an outdoor interior courtyard.
Other	Loading, trash, maintenance facilities and storage will be located underground.

Wesley has requested flexibility on the final mix of unit types subject to a maximum of 659 beds. OP does not oppose this flexibility.

Circulation and Loading

The entrances to the parking garage and loading docks would be on the northern portion of the building. The vehicular circulation system would remain essentially the same as currently exists, but with additional restrictions on use of the University Avenue access point. Delivery, maintenance, and emergency vehicles only would enter and exit from University Avenue and would be restricted from left turns upon exiting. Additionally, entering or exiting during morning and evening peak traffic hours would be restricted. All other vehicles (such as private vehicles, ride-share, etc.) would enter and exit from Massachusetts Avenue, as they currently do. [Exhibit 16C](#), page 7. With the entrance to the parking garage and loading docks oriented towards Massachusetts Avenue and buffered by two buildings, the operations of the loading and parking facilities have been designed to minimize noise spillage into the nearby neighborhood.

Landscaping, Open space and Buffer

The existing open space and landscaping enhancements would create a more substantial and durable buffer to the neighborhood, especially along University Avenue NW. The existing 2014 Residence Hall is located 171 feet from University Avenue and is approximately 205 feet for the residences

across University Avenue. The new dormitory would be located even further from University Avenue - approximately 300 feet - and approximately 660 feet to be nearest residential properties along Sedgwick Street, N.W. to the north. The new dormitory would be adjacent to AU dormitories and playfields and would be set back a minimum 35 feet from the AU boundary. The distance, other buildings, and enhanced vegetation would provide some visual buffering of the new dormitory from existing neighborhood residences as shown on the landscaping plans at [Exhibit 16A](#). OP is supportive of the University's commitment to retain up to 53% of the campus as undeveloped and landscaped.

The existing landscaped buffer along Massachusetts Avenue and the over 200-foot-deep buffer at the corner of Massachusetts Avenue and University Avenue would be retained. Wesley has identified 76 special trees and 27 heritage trees on the campus all of which would be retained. With the proposed demolition of the two dormitories and the parking lot to make way for the new residence hall, some trees would be removed. However, views of the buildings from University Avenue and Massachusetts Avenue would be minimized by the significant number of trees to be replanted and the extensive landscaping around the dormitory.

The current 171-foot buffer along University Avenue would be altered by the demolition of the existing President's House in favor of a neighborhood playground. New plantings would be introduced along the driveway off University Avenue and around the new playground. The new plantings would complement the existing vegetation and would consist of a mix of shade trees, ornamental trees, evergreen trees, deciduous shrubs and evergreen shrubs. Plantings along the driveway would further enhance the entrance road and hide utility boxes. Significant additional plantings along University Avenue would be planted to create privacy and enclose the playground.

Transportation Improvements

In addition to the 295 vehicle parking spaces (264 in the dormitory), and 62 long term and 12 short term bicycle spaces on the campus, Wesley would fund and install a 19-dock Capital Bikeshare Station with 12 bikes on campus and fund one year of maintenance and operations costs. The use of public transportation is encouraged and the campus is well served by public transportation with the Tenleytown Metrorail station located approximately half-mile to the east of the campus. The Campus is also served by the N3, N4, N6, and N8 Metrobus routes along Massachusetts Avenue, and the N2 and M4 Metrobus routes along nearby Nebraska Avenue, NW. Wesley students, faculty and staff would also have access to the AU shuttle bus service.

To improve pedestrian movements along adjacent streets Wesley would provide public space improvements including:

- Constructing a sidewalk along the east side of University Avenue NW between Massachusetts Avenue and Rodman Street, subject to DDOT approval, with a lead walk into campus along at least one side of the site driveway;
- Installing signage, crosswalk and ADA curb ramps on the south leg of University Avenue at the Rodman Street intersection, subject to DDOT approval; and
- Installing 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.

Wesley has also committed to a Transportation Demand Management (TDM) Plan and a Performance Monitoring Plan (PMP) aimed at reducing vehicular trips to the university, tracking the progress towards the outlined TDM goals. These alternate means of transportation and transportation improvements are all aimed at reducing vehicular trips to and from the university and improving pedestrian access.

DDOT will provide analysis of recommendations for the traffic, parking, and circulation impacts as well as the TDM measures submitted with the campus plan. OP is supportive of the measures to improve vehicular and pedestrian circulation around and through the campus and reduce parking demand and parking on neighborhood streets.

Sustainability

The campus has been upgrading its infrastructure to improve its sustainable performance during the existing campus plan. The development of the new dormitory would allow for further improvements to campus sustainability with improvements to stormwater measures and enhanced open space throughout the campus, including preservation of heritage trees. The new dormitory would be built to LEED Mid-Rise Residential Gold certification achieved through a combination of energy and water conservation methods in addition to approximately 2,800 square feet of solar panels and 20,000 square feet of green roofs. The campus is projected to have a GAR score of 0.6 which exceeds the 0.4 minimum. Wesley states that their desire to provide a net zero building is tempered by cost, space limitations and integration challenges.

Assessment of the new dormitory and campus sustainability is further assessed in the Department of Energy and Environment (DOEE) report which encourages Wesley to continue to explore ways to move the environmental performance of the campus to closer to carbon-neutrality as part of longer-range sustainability goals. DOEE comments are at Attachment I.

Community Amenities

As part of this campus plan, Wesley offered a playground for community use on the Lots 7, 8 and 9, the three small lots fronting on University Avenue. The 3,800 square feet playground would be set back approximately forty feet from University Avenue with access via an entry path from the sidewalk along University Avenue. The park would be enclosed by a 48 inch tall, vinyl-coated, chain link fence with natural, double shredded hardwood mulch surface for safety. The playground would include benches and play equipment suitable for toddlers and young children, would be open only during daylight hours and therefore no lights would be provided. [Exhibit 16A](#), page 5.

As a community amenity, Wesley has also committed to provide the following sidewalk and public space improvements along University Avenue:

- A sidewalk along the east side of University Avenue NW between Massachusetts Avenue and Rodman Street, subject to DDOT approval, with a lead walk into campus along at least one side of the site driveway;
- Signage, crosswalk and ADA curb ramps on the south leg of University Avenue at the Rodman Street intersection, subject to DDOT approval.
- 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; and

- Wayfinding signage on the campus directing students to the gated connection to the American University campus.

Security Plan

The dormitory would have its own internal security which would include on-site staff, nighttime patrols, and coordination with Metropolitan Police and the AU security services. Campus-wide security currently include physical, personnel and operational security features. To further improve the campus security, Wesley proposes to install a network of campus-wide security cameras which would enhance security for students, faculty, staff, residents, and visitors, provide deterrence and allow for real time monitoring and are outlined in the Wesley Seminary-New University Housing Security Plan at [Exhibit 16E](#).

Construction Manage Plan

Wesley has submitted a draft Memorandum of Understanding for construction management at [Exhibit 16F](#). Wesley states that they have worked with the community to establish a neighborhood construction management committee to minimize the impact of construction activities. Issues addressed include having pre-construction meetings and notice, having a 24-hour point of contact, limiting construction worker and construction vehicle parking on neighborhood streets, minimizing on-street truck idling, providing stormwater management and erosion control, and remediation of any construction related damages.

VI. CAMPUS PLAN REVIEW STANDARDS FOR FURTHER PROCESSING

Subtitle X § 101 of the Zoning Regulation establishes that further processing of an approved campus plan shall be processed as a special exception.

101.3 Any commercial use customarily incidental to a university use in an R, RF, or RA zone, or as an adjunct use to a university building, shall be subject to the following conditions:

- (a) There shall be a demonstrated and necessary relationship between the use and the university functions;*

101.4 The campus plan process shall not serve as a process to create general commercial activities or developments unrelated to the educational mission of the applicant or that would be inconsistent with the Comprehensive Plan.

In ZC Order 24-09, the Commission determined and affirmed that Wesley has a unique situation in which they are housing AU students on its campus in order to meet its educational mission and approved a text amendment which exempted Wesley from the requirements of Subtitle X §§ 101.3 and 101.4. The text amendment created a new Subtitle X § 101.5 that states:

101.5 University housing exclusively for use by Wesley Theological Seminary and American University students, faculty, and staff on Square 1600, Lot 819 shall not be subject to the commercial use restrictions in this section if approved by the Zoning Commission as part of a campus plan.

The campus plan did not proposes any commercial uses that subject to this restriction, and none are proposed in this further processing application.

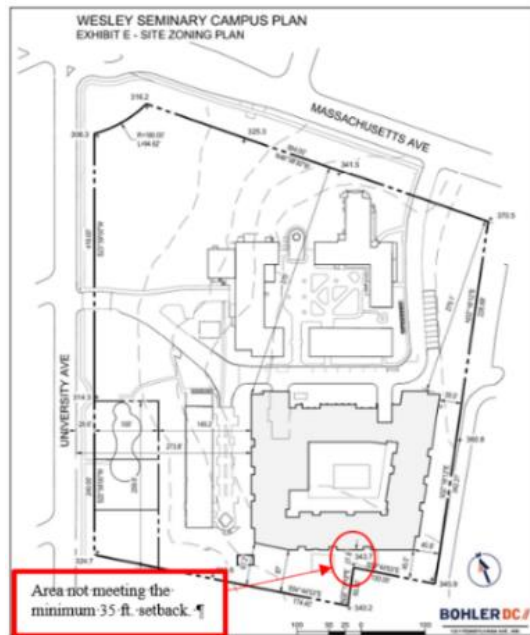
101.6 *The maximum height and the maximum total floor of all buildings and structures on the campus shall be as set forth in the following table:*

TABLE X § 101.5: MAXIMUM HEIGHT AND TOTAL FLOOR AREA RATIO OF ALL BUI OF ALL BUILDINGS AND STRUCTURES		
Zone	Maximum Height Feet	Maximum Floor Area Ratio
R and RF	50	1.8
RA-1	50	1.8
RA-2	60	1.8
RA-3, RA-4 and RA-5	90	3.5

The Regulations limit height in the RA-1 zone to 50 feet, but Subtitle F § 203.7 allows for institutional buildings to have a height of up to 90 feet. The proposed dormitory would have a height of 74.6 feet and so would meet the requirement. With the new dormitory, the campus would have an overall FAR of 1.03 which is within the 1.8 maximum.

Further, the building is required to be setback from each property line a foot for every foot of height beyond 50 feet resulting in a building setback a minimum of 35 feet. Wesley has granted variance relief from this requirement at the time of the Campus Plan for a small portion of the building which only has a setback of 27 feet (Figure 3).

Figure 3



101.9 *The further processing of specific buildings, structures, and uses within an approved campus plan shall be processed as a special exception unless the campus plan approval was included in an order granting a first-stage planned unit development (PUD) for the campus, in which case the further processing shall be in the form of second-stage planned unit development applications filed consistent with the conditions of the approved campus plan/PUD.*

This instant application for a special exception for further processing for the new dormitory is identified in the campus plan.

101.11 In reviewing and deciding a campus plan application or new building construction pursuant to a campus plan, the Zoning Commission shall consider, to the extent they are relevant, the policies of the District Elements of the Comprehensive Plan.

In the review of the overall campus plan, the Commission determined that the campus plan was not inconsistent with the Comprehensive Plan Maps, the relevant Citywide policies and those of the Rock Creek West Area Element. The proposed dormitory would continue to be not inconsistent with the Comprehensive Plan, as addressed in Section VIII of this report.

101.12 As an integral part of the application requesting approval of new building construction pursuant to a campus plan, the college or university shall certify and document that the proposed building or amendment is within the FAR limit for the campus as a whole, based upon the computation included in the most recently approved campus plan and the FARs of any other buildings constructed or demolished since the campus plan was approved.

Table 6 below shows the comparison of the FAR, building size, number of beds, number of units and the buildings to be demolished in the approved 2024 Campus Plan versus what is being proposed in this further processing application.

Table 6

Proposed Development of Wesley Theological Seminary Campus			
Building	Use	Approved by Campus Plan	Further Processing
Straughn Hall	Dormitory	To be demolished	No Change
Carroll Hall	Dormitory	To be demolished	No Change
Old President House	Storage	To be demolished	No Change
Library	Academic	16,630 square feet	No Change
Trott Hall / Chapel	Academic/ Religious	26,335 square feet	No Change
Kresge	Academic	32,819 square feet	No Change
2014 Dormitory	Dormitory	29,195 square feet	No Change
New Dormitory: Total Beds	Dormitory --	282,061 square feet 659 beds (215 units)	281,911 square feet 659 (185 units)
Total Campus	All	387,040 square feet	386,910 square feet
FAR (RA-1 permits 1.8)	--	1.014	1.013

The Campus Plan approved the demolition of two dormitories and the Old Presidents House and construction of a new dormitory. These recommendations have being carried forward in this further processing application. The Campus Plan approved a maximum of 282,061 square feet for the new dormitory and is being slightly reduced to 281,911 square feet in the proposal. The 659 beds approved in the Campus Plan would remain although the number of units would be reduced from 215 to 185. Overall, the total square footage of all building on campus would be reduced from

387,040 square feet to 386,910 square feet as a result of the decrease in the square footage of the dormitory. The reduction also resulted in a slight decrease in the overall campus FAR from 1.014 to 1.013, still below the 1.8 FAR allowed in the RA-1 zone. In summary, the proposed dormitory is consistent with the approved Campus Plan.

101.13 Pursuant to Subtitle Z § 405.1, as soon as the application is accepted, the Office of Zoning shall refer the application to the Office of Planning, the Department of Transportation, and the Department of Energy and Environment for review and written reports.

DDOT will submit a separate report. Comments from the DOEE are attached at Attachment I.

101.15 Small deviations from plans approved under further processing that are determined necessary by the Zoning Administrator for compliance with life, safety, or building codes, may be permitted without an amendment to a further processing provided the deviation does not result in an increase in gross floor area of more than four-hundred and fifty square feet (450 sq. ft.) and the addition shall only be used for purposes of ingress, egress, or handicap access.

Wesley has not requested any deviations at this time.

101.16 A further processing of a campus building shall not be filed simultaneously with a full campus plan application. However, an amendment to an approved campus plan may be considered simultaneously with the further processing if determined necessary by the Zoning Commission.

Wesley has not requested any amendments to the 2025 Campus Plan with this further processing application.

VII. FURTHER PROCESSING REQUIREMENTS OF THE 2025 CAMPUS PLAN

As part of the campus planning process, there were extensive discussions regarding whether Wesley was required to meet the IZ Regulations, as the proposed dormitory would also be housing AU students in addition to Wesley students. Wesley then offered to provide IZ units off-site. They also sought relief from some of the off-site requirements by filing a text amendment to the Zoning Regulations.

Prior to the approval of the Campus Plan, ZC Order 24-09, effective July 21, 2025, approved a text amendment to add new Subtitle C § 1006.10, which allowed off-site compliance with Inclusionary Zoning specifically for Wesley and that it be a condition of approval of the further processing application. Subtitle C § 1006.10 states:

1006.10 Wesley Theological Seminary shall provide off-site IZ located in Ward 3 as an enforceable condition to its 2025-2035 Campus Plan further processing to construct university housing on Wesley's campus, provided that the requirements of Subtitle C §§ 1006.1 - 1006.3(a)-(g), may be waived by the Zoning Commission for the off-site IZ. Depending on construction type, the off-site IZ provided shall be no less than Subtitle C §1003.1 or §1003.2 set-aside requirements, as applicable, and subject to the requirements of Subtitle C §§ 1006.5 - 1006.9. Notwithstanding the foregoing, and for good cause shown, the Zoning Commission shall have broad discretion to determine that the off-site IZ

requirement described in this provision can be satisfied by alternative means, including increasing the set-aside requirements described herein and/or by requiring Wesley to make a financial contribution, deemed sufficient by the Zoning Commission, to an organization(s) that will facilitate the construction of new affordable housing reserved for households at or below 60% of median family income for rental units or at or below 80% of median family income for ownership units exclusively in Ward 3, provided that such alternative means is stated as an enforceable condition to the 2025-2035 Campus Plan further processing to construct university housing on Wesley's campus.

To meet the requirement of Subtitle C § 1006.10, Wesley requested the ZC waive the requirements of Subtitle C §§ 1006.1 - 1006.3(a)-(g) and Subtitle C §§ 1006.5 – 1006. Wesley proposes to meet the off-site requirement by “*alternative means*”, being a financial contribution of eight million dollars (\$8 million) to be used for affordable units. Wesley believes that the \$8 million is sufficient. **“Depending on construction type, the off-site IZ provided shall be no less than Subtitle C §1003.1 or §1003.2 set-aside requirements”** which requires a minimum 10% set aside for affordable units. Wesley posits that the donation would provide a 10.97% set aside without any exemption for Wesley units or benefits of bonus density based on the calculations below.

Table 7

New University Housing – Inclusionary Zoning Analysis	
Proposed Total Gross Floor Area	281,911 sf
Net Residential Gross Floor Area	224,411 sf
Required IZ Set-Aside @ 10% (Type 3 Construction)	22,441 sf
Unrealized 20% IZ Bonus (Maximum) 56,582 sf	56,582 sf
Unrealized Wesley IZ Exemption	(90/659 beds = 13.6%) 30,519 sf
Estimated Value/Cost of 10% IZ @ \$325/sf	\$7,293,325
Proposed \$8,000,000.00 IZ Off-site IZ Fund @ 325/sf = 24,615 sf (10.97%)	

In their submissions, Wesley outlined a process in which the money would be donated to a private entity, Local Initiatives Support Corporation (LISC), which would invest the funds in affordable housing projects.

Subsequent to the Wesley's submissions as part of continued discussions with DHCD and OP, DHCD proposed an alternative in which money would be donated to DHCD, who would then create and administer an affordable housing fund (Fund) to support long-term affordable housing in Ward 3. DHCD acknowledges that it is an unusual and unique circumstance that has led to this option, but that they have policies and systems in place to administer such a program. The major components of the fund would:

- Deliver a minimum of 22,436 net square feet of affordable housing;
- Be at 60% MFI for rental or 80% MFI for homeownership units;
- Be set aside for the life of the project; and
- Be located in Ward 3.

DCHD indicated that the \$8 million contribution is an effective leverage of the onsite requirement under current conditions. DHCD estimates it could potentially fund as many as thirty (30) affordable units based on the average square footage of IZ units at a subsidy of approximately \$267,427 per unit. However, DHCD expressed concern that if permits are not issued and the first half of the funds received within two years it will be more difficult to achieve the 22,436 net square feet of affordability due to rising costs and changing market conditions.

DHCD concluded that it will be necessary to blend the funds with additional subsidies in order to achieve the required square feet and that the funds could be applied in three different ways to deliver the affordable units. Each would be enforceable through covenants between DHCD and the property owner.

1. DHCD's preferred option is the creation of a home purchase assistance fund available to low-income purchasers who want to buy an existing home in Ward 3. Affordable ownership opportunities in Ward 3 are even more scarce than affordable rental properties. The funds would be available via lottery to households earning 80% MFI or less, who have received a Home Purchase Assistance Program (HPAP) notice to proceed. The funds would then be used to supplement the HPAP award toward the purchase of a home in Ward 3. In addition, to the Fund, DHCD's would seek a first mortgage lending partner such as the DC Housing Finance Agency (HFA). A covenant would be placed on the property requiring long-term price controls comparable with the IZ price schedule. Long term price controls would also enable reduced property tax assessment through the Office of Tax Assessments (OTA).
2. New construction of either affordable rental or ownership housing. This approach would include merging the funds with applications for DHCD's Housing Production Trust Fund, Low-Income Housing Tax Credits and other DHCD sources. This approach reduces the burden on DHCD's other sources and enables DHCD to finance more affordable units overall.
3. Conversion of existing housing to long-term affordable rental or ownership housing. This approach would include funding the acquisition of existing properties or refinancing of existing debt in order to convert the properties into long-term affordable housing. There are several properties that could potentially benefit from this approach.

Subtitle C § 1006.10, requires that the donation be “ . . .to an organization(s) that will facilitate the construction of new affordable housing . . .” In this case, DHCD would be the organization to facilitate the creation of the affordable housing. However, under the options outlined above, DHCD is requesting that the ZC provide relief to allow the option that some of the units may be provided in buildings that are not new construction as the requirement would eliminate the possibility of using the funds to convert existing residential to either affordable rental or homeownership opportunities.

DHCD shall provide a written report to the Zoning Commission on the progress the fund makes in meeting the 22,436 square feet requirement within forty-five (45) days after the one year anniversary of DHCD having received the funds and each year after that until the funds are expended.

As a condition of approval, DHCD has committed to reporting to the Zoning Commission on the progress the fund makes in meeting the 22,436 square feet requirement on an annual basis within

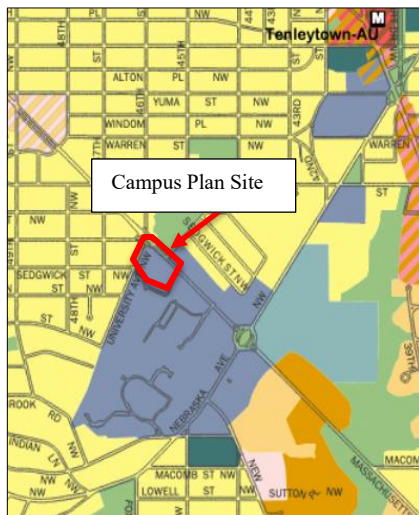
forty-five (45) days after the one year anniversary of DHCD having received the funds and each year after that until the funds are expended.

Finally, DHCD acknowledges the unique circumstances that have led up to this opportunity and recommends against similar future approaches to off-site IZ requirements. DHCD has committed to working with OP and the Office of Zoning Legal Division on any legal requirements to form the fund.

VIII. PLANNING CONTEXT

A. Comprehensive Plan Maps

Generalized Future Land Use Map (FLUM)



Institutional: This designation includes land and facilities occupied and used by colleges and universities, large private schools, hospitals, religious organizations, and similar institutions. While included in this category, smaller institutional uses such as churches are generally not mapped, unless they are located on sites that are several acres in size. Zoning designations vary depending on surrounding uses. Institutional uses are also permitted in other land use categories. 227.18

The FLUM designation is for Institutional use, similar to the American University's designation to the south and the east. Low density residential is to the northwest and northeast. The institutional use would be a campus of higher learning and the proposed dormitory be a university use in addition to community amenities.

Generalized Policy Map (GPM)



Institutional Uses: Much of the land identified as institutional on them a represents colleges and universities; change and infill can be expected on each campus consistent with campus plans. Other institutional sites, including hospitals and religious orders, likewise may see new building so facilities added. Policies in the Land Use and the Educational Facilities Elements address the compatibility of such uses with surrounding neighborhoods.

The Generalized Policy Map designation is also for Institutional Uses. The proposed dormitory would be entirely within the boundaries of Wesley's existing institutional campus.

B. The Campus Plan in Relation to the Comprehensive Plan, As Viewed Through a Racial Equity Lens

The Comprehensive Plan recognizes that advancing equity requires a multifaceted policy approach and that many areas of policy must be brought to bear on the challenge:

Equitable development is a participatory approach for meeting the needs of underserved

communities through policies, programs and/or practices that reduce and ultimately eliminate disparities while fostering places that are healthy and vibrant. Equitable development holistically considers land-use, transportation, housing, environmental, and cultural conditions, and creates access to education, services, health care, technology, workforce development, and employment opportunities. As the District grows and changes, it must do so in a way that encourages choice, not displacement, and builds the capacity of vulnerable, marginalized, and low-income communities to fully and substantively participate in decision-making processes and share in the benefits of the growth, while not unduly bearing its negative impacts. 213.7

The Implementation Element calls for “the Zoning Commission to evaluate all actions through a racial equity lens as part of its Comprehensive Plan consistency analysis”^{2501.8}. Achieving equity and more specifically racial equity requires a broad range of policies and tools, some of which fall under the zoning authorities granted to the Zoning Commission and some of which do not. Zoning Commission actions are land use focused, but the broader equity goal includes public policies, budget investments, civic improvements and social services which are beyond the scope of the Zoning Commission.

The direction to consider equity “as part of its Comprehensive Plan consistency analysis” indicates that the equity analysis is intended to be based on the policies of the Comprehensive Plan and part of the Commission’s consideration of whether a proposed zoning action is “not inconsistent” with the Comprehensive Plan, rather than a separate determination about a zoning action’s equitable impact.

The scope of evaluation of “all actions through a racial equity lens” varies depending on the type of zoning action before the Commission and what aspects of the outcome the Zoning Commission can control. Equity is conveyed throughout the Comprehensive Plan, particularly in the context of zoning, where certain priorities stand out. These include affordable housing, displacement, and access to opportunity.

The proposed dormitory would provide housing to Wesley and AU students, faculty and their immediate families. It would also provide some employment opportunities to District residents, although not necessarily those currently residing in Rock Creek West.

Approximately 34% of the Seminary’s students are Black. 18% of the administration, 25% of the faculty, and 7% of other staff are Black – the second largest racial or ethnic group in the Rock Creek West planning area. To the extent that current and projected Wesley and AU students and their immediate families are or would reside in the District, the proposed expansion of graduate student housing could help to free up residential units in the broader neighborhood.

This could help to relieve demand on the District’s housing supply. This may have some positive impact on housing affordability for members of racial and ethnic minority groups, although given the demographic profile of the Rock Creek West Planning Area and the composition of the Wesley student body, faculty and other employees, white people are likely to benefit more than any other racial or ethnic group.

However, the revenues Wesley would gain from the new dormitory are projected to stabilize the university’s financial future. Given the careers led by Seminary graduates and the outreach the Wesley engages in within the District, the retention of the seminary may also contribute to racial equity. While some of the student body pursue academic careers, most are trained for careers in service to others. In addition to becoming pastors at congregations such as Shiloh Baptist and Metropolitan Baptist, Ebenezer A.M.E., Foundry Methodist and others, seminary graduates serve as

leaders in a range of non-profit organizations. The seminary actively engages its graduates in virtual and in-person training to advance community engagement skills and provides real time assistance to events promoting racial and social justice. It also runs an internship program placing Wesley and other theological students as interns in churches throughout the District.

Finally, the proposed contribution to the provision of new affordable housing options in Ward 3 – potentially including home-ownership opportunities – would further policy objectives to expand home-ownership and therefore wealth-building opportunities for all residents in the District.

RACIAL EQUITY TOOL PART 1 – COMPREHENSIVE PLAN GUIDANCE

Equity is conveyed throughout the Comprehensive Plan, particularly in the context of zoning, where the provision of affordable housing, avoiding displacement of existing residents, and creating access to opportunity is a priority. The Commission’s Racial Equity Tool outlines information to assist in its evaluation of zoning actions through a racial equity lens. The required information is provided below in relation to the campus plan.

The clearest impact of the proposed dormitory when viewed through a racial equity lens is the relative lack of any impact. The proposed dormitory would clearly not result in physical displacement of residents as the site does not currently include residential use. The most positive impact may be the continuation of Wesley’s seminary as a viable institution. The racially diverse composition of its graduates, student body and employees was noted in the approved Campus Plan. The density gained by a dormitory in the RA-1 zone would increase dormitory/residential use on the site and provides Wesley an opportunity to provide housing for Wesley and AU students, and could potentially free up other rental housing for non-student populations. Additionally, Wesley would provide funding for off-site affordable units within Ward 3, potentially including homeownership enabling funding which could disproportionately benefit Black and persons of color residents.

Below are Comprehensive Plan policies, including ones related to racial equity, that would potentially be advanced by approval of the zoning action:

CITYWIDE ELEMENTS

Chapter 3, Land Use Element

Policy LU-2.2.4: Neighborhood Beautification

Neighborhood Beautification Encourage projects that improve the visual quality of neighborhoods, including landscaping and tree planting, facade improvement, anti-litter campaigns, graffiti removal, murals, improvement or removal of abandoned buildings, street and sidewalk repair, park improvements, and public realm enhancements and activations. 311.5

Policy LU-2.3.5: Institutional Uses

Recognize the importance of institutional uses, such as private schools, childcare facilities, hospitals, churches, and similar uses, to the economy, character, history, livability, and future of Washington, DC and its residents. Ensure that when such uses are permitted in residential neighborhoods, their design and operation is sensitive to neighborhood issues and neighbors’ quality of life. Encourage institutions and neighborhoods to work proactively to address issues, such as transportation and parking, hours of operation, outside use of facilities, and facility expansion. 312.7

Policy LU-3.3.1: Transportation Impacts of Institutional Uses

Support ongoing efforts by institutions to mitigate their traffic and parking impacts by promoting ridesharing, carpooling, public transportation, shuttle service and bicycling; providing on-site parking; and undertaking other transportation demand management measures. 317.7

Policy LU-3.3.3: Nonprofits, Private Schools and Service Organizations

Plan, design, and manage large nonprofits, service organizations, private schools, seminaries, colleges and universities, and other institutional uses that occupy large sites within residential areas in a way that minimizes objectionable impacts on adjacent communities. Expansion of these areas should not be permitted if the quality of life in adjacent residential areas is significantly adversely impacted. 317.9

The further processing includes measures to minimize potentially objectionable impacts on the adjacent community. Foremost is the enhanced landscape buffering along the campus perimeter, placing the new dormitory as far away from the adjacent residential neighborhood as possible, and provide a neighborhood-oriented playground adjacent to University Avenue.

During this and other proceedings related to the campus plan, Wesley has worked proactively with the neighboring residential community and the ANC, particularly around the issue of Wesley's housing a significant number of AU students in the proposed dormitory. Wesley has responded by reducing the height initially proposed for the new dormitory and providing additional setbacks for its upper stories to minimize any potential light-spillage issues.

The Land Use element encourages universities to provide alternative transportation options which is provided through bicycle, shuttle and rideshare options to mitigate traffic and parking impacts. The proposed measures are further evaluated in the DDOT report. The proposed dormitory, and buffering would be not inconsistent with the Land Use Elements.

Chapter 4, Transportation Element

Policy T-1.1.8: Minimize Off-Street Parking

An increase in vehicle parking has been shown to add vehicle trips to the transportation network. In light of this, excessive off-street vehicle parking should be discouraged. 403.14

Policy T-5.2.2: Charging Infrastructure

Encourage early deployment of EV charging stations at no charge in appropriate, publicly accessible locations across the District to serve existing neighborhoods. Consider the integration of EV charging stations in new and existing residential and commercial developments. Consideration should also be given to locations where EV charging stations can be retrofitted into parking garages. As EVs become more popular, there will be increased demand for on-street charging stations, which will need to be balanced with other curbside needs and uses. 430.4

The proposed dormitory is not inconsistent with the Transportation Element of the Comprehensive Plan. Transportation improvements would include 264 parking spaces in a below grade garage along with six to eight EV charging stations. The proposal promotes bicycle, pedestrian, and shuttle bus usage, with the provision of 62 long-term bicycle parking spaces and 12 short term spaces near to the entrance to the building. The new dormitory would designate an on-campus ride-sharing

pick-up and drop-off location adjacent to the dormitory, along with on-campus rental bike and scooter parking area.

Wesley would provide adequate parking on campus. The plan proposes to increase on-campus parking, although providing it at a decreased student-bed to parking-space ratio than it does now. Simultaneously, by de-bundling parking from dormitory-room rental, by prohibiting student, faculty and employee parking on residential streets, and by encouraging the use of mass transportation and other alternatives to private vehicles, traffic impacts on the adjacent neighborhood should be minimized.

Chapter 5, Housing Element

Policy H-1.1.1: Private Sector Support

Encourage or require the private sector to provide both new market rate and affordable housing to meet the needs of present and future District residents at locations consistent with District land use policies and objectives. 503.3

Policy H-1.1.8: Production of Housing in High-Cost Areas

Encourage development of both market rate and affordable housing in high-cost areas of the District, making these areas more inclusive. Develop new, innovative tools and techniques that support affordable housing in these areas. Doing so increases costs per unit but provides greater benefits in terms of access to opportunity and outcomes. 503.10

Policy H-1.2.3: Affordable and Mixed-Income Housing

Focus investment strategies and affordable housing programs to distribute mixed-income housing more equitably across the entire District by developing goals and tools for affordable housing and establishing a minimum percent affordable by Planning Area to create housing options in high-cost areas, avoid further concentrations of affordable housing, and meet fair housing requirements. 504.10

Policy H-1.3.5: Student Housing

Require colleges and universities to address the housing needs of their students and promote the use of such housing by their students. 505.12

Action H-1.2.B: New Revenue Sources

Continue to identify and tap new sources of revenue for programs such as the HPTF to produce affordable housing and keep rental and owned housing affordable. These new sources should add to the portion of the deed and recordation taxes dedicated to the HPTF, such as the feasibility of earmarking a portion of residential property tax revenue increases for the fund. 504.23

The proposed dormitory, serving students, faculty and their families, would have a variety of unit sizes to accommodate one to five beds. The building would also have family sized units to accommodate students with their immediate families. The proposed dormitory would serve the need of both Wesley and AU students. The IZ contributions would facilitate the provision of new moderate income housing in a high cost area.

Chapter 6, Environmental Protection Element

Policy E-2.1.2 Trees Requirements in New Developments

Use planning, zoning, and building regulations to promote tree retention and planting, as well as the removal and replacement of dying trees when new development occurs. Tree planting and landscaping required as a condition of permit approval should include provisions for ongoing maintenance. 605.6

Policy E-3.2.1: Support for Green Building

Encourage the use of green building methods in new construction and rehabilitation projects and develop green building methods for operation and maintenance activities. 614.2

The proposed dormitory would not be inconsistent with the Environmental Protection Element of the Comprehensive Plan. The school's well-maintained and wooded environment is a defining feature of the campus' character with 53% of the campus remaining as open space. Existing heritage and special trees would be retained and supplemented by additional trees and vegetation. planted. Additionally, the dormitory would replace a surface parking lot and built to LEED Gold mid-rise residential standards. The dormitory would include solar panels and a green roof, and other environmental elements addressed in the DOEE Report.

When viewed through a racial equity lens, the proposed dormitory is likely to have a neutral to positive impact from an environmental standpoint. OP is not aware of the existing campus having any negative environmental justice impacts and, with the planned certification at LEED Gold, the new building is not likely to have new negative impacts.

Chapter 7, Economic Development Element

Policy ED-1.1.1: Core Industries

Continue to support and grow the District's core industries, particularly the federal government; professional, scientific and technical services; religious, grantmaking, civic professional, and similar organizations; postsecondary education; accommodation and food services; health care and social assistance; and administrative support services. 703.12

Policy ED-2.4.1: Institutional Growth

Support growth in the higher education and health care sectors. Recognize the potential of these institutions to provide employment and income opportunities for District residents, and to enhance the District's array of cultural amenities and health care options. 710.4

The revenues realized by the dormitory would allow Wesley to remain open and continue providing its educational and outreach programs, as well as employment and other opportunities to District residents. The proposed dormitory is therefore not inconsistent with the Economic Development Element of the Comprehensive Plan.

Chapter 8, Parks, Recreation and Open Space Element

Policy PROS-4.2.1: Institutional Open Space

Encourage local institutions—such as private and parochial schools, colleges and universities, seminaries, hospitals, and churches and cemeteries—to allow the cooperative

use of their open space lands for the benefit of District residents. Explore funding and insurance mechanisms that would incentivize and preserve local institutions that choose to provide cooperative use. Ensure that cooperative uses recognize and respect institution missions and operations. 818.3

The new playground which would be accessible to the nearby neighborhood, and the preservation of 53% of the campus as green, open space, associated with the new dormitory and the overall campus plan would be not inconsistent with this element.

Chapter 12, Educational Facilities Element

Policy EDU-3.2.2: Corporate Citizenship

Support continued corporate citizenship among Washington, DC's large institutions, including its colleges, universities, hospitals, private schools, and nonprofits. This should include a continued commitment to high quality architecture and design on local campuses, expanded use of green building methods and low impact development, and the adaptive reuse and preservation of historic buildings. 1213.3

Policy EDU-3.2.4: Universities as Community Partners

Encourage universities to expand service-oriented partnerships that connect students with local communities and that can strengthen town-gown relationships. 1213.5

Policy EDU-3.3.3: Universities as Large Land Owners and Campus Plan Requirements

Continue to require campus plans for colleges and universities located in residential and mixed-use zone districts. These plans should be prepared by the institutions themselves, subject to District review and approval, and should address issues raised by the surrounding communities. Each campus plan should include provisions that respect neighbors and neighboring property and ensure that potentially objectionable impacts such as noise, traffic, number of students, or other similar conditions are addressed. 1214.8

Policy EDU-3.3.4: Student Housing

Encourage the provision of on-campus student housing in order to reduce college and university impacts on the housing stock, especially the affordable housing stock, in adjacent neighborhoods. Consider measures to address the demand for student housing generated by non-District institutions with local branches. 1214.9

Policy EDU-3.3.5: Transportation Impacts of Colleges and Universities

Support ongoing efforts by colleges and universities to mitigate their traffic and parking impacts by promoting ridesharing, carpooling, shuttle service, bicycling, scooters, skateboarding, and other transportation demand management measures. The provision of adequate on-site parking for institutional uses also should be encouraged. 1214.10

As demonstrated in the campus plan, the dormitory is not inconsistent with the Education Element of the Comprehensive Plan. The campus is an open campus, readily accessible to neighbors. The along with the dormitory, Wesley would be expanding access with a neighborhood-oriented playground in addition to other programs which the community is invited to participate in on campus.

The dormitory could help to decrease the rental pressures that students place on private housing stock by developing dormitory space not only for Wesley students and their families, but also for

American University students and their immediate families. These students and their families would otherwise be seeking market rate housing.

As discussed in the transportation element section, Wesley would be improving the pedestrian, bicycle, and shuttle transportation on campus.

Rock Creek West Area Element

Policy RCW-1.1.8: Managing Institutional Land Uses

Institutional land uses in the Rock Creek West Planning Area should be harmonious with surrounding uses, and potential adverse effects on neighboring properties should be minimized when institutions seek expansion. Redevelopment of institutional land should be compatible with the physical character of the community, the changing nature of the District, and not inconsistent with provisions of the Comprehensive Plan and the underlying zoning rules and regulations. Densities and intensities of any future development on such sites should reflect input from the local community, accommodating student housing on campuses and future infrastructure needs. 2308.9

Policy RCW-1.1.9: Conserving Common Open Space

Conserve the large areas of green space and interior open spaces that are common in and around the community's institutional uses and its older apartment buildings. Where these open spaces are recognized to contribute to the integrity of the site or structure, consideration should be given to reconcile infill with these open spaces. 2308.10

The proposed dormitory would be harmonious with the nearby neighborhood and the adjacent American University. While the building would be three stories taller than other buildings on campus, it would be set back from the nearby neighborhood by at least 300 feet and would be less tall than the nearby American University dormitories. As shown in [Exhibit 16A](#) and [Exhibit 16D](#), the combination of the existing four-story 2014 dormitory to the north and the additional landscaping should help to reduce the visual impact of the proposed dormitory when viewed from the neighborhood to the north, particularly during warmer-weather months.

Wesley has worked with the community to refine and incorporate their input into the shaping and design of the dormitory and the landscaping to ensure the building is congruent with the other buildings that would remain on the campus.

The dormitory would increase the number of beds on campus by approximately four-fold and would double the number of parking spaces. However, and potential impact should be mitigated by the following:

- There would be no increase in enrollment on the campus. The increase would be in the number of beds on campus with the preponderance of beds being rented to AU students and their families. Most of pedestrian circulations would be between the Wesley campus and the AU campus to the south rather than to the residential neighborhoods to the north or east.
- With the increase in the number of parking spaces being proportionately less than the increase in beds; with the prohibition on residential parking permits for those living or working on campus; with the additional restrictions on delivery movements; and with general vehicular traffic being restricted to the Massachusetts Avenue access point, the

transportation analysis indicates that the impact of the additional population on campus and additional vehicular storage should not be excessive.

The proposed dormitory is not inconsistent with the Rock Creek West Area Element.

Racial Equity Tool Part 2 – Applicant/Petitioner Community Outreach and Engagement

Wesley has been engaging with the community since its initial campus plan in 2005. Community engagement for the 2025 Campus Plan effectively began in 2019 and the involved groups have included ANCs 3D and 3E, a Community Liaison Committee established under the campus plan process, and neighborhood civic groups such as the Spring Valley-Wesley Heights Citizens Association, Spring Valley Neighborhood Association, other interested parties and individuals. Wesley lists such meetings at Exhibit 16, Section III and the changes such as additional landscaping, the community playground, a reduction in the height of the dormitory building, to plans that resulted from them.

The previous campus plan, PUD and map amendment proposals, were not without opposition. The concerns have been about the scale of the proposed dormitory, prior absence of coordination between Wesley and AU on a dormitory on the Wesley campus that would house significantly more students from AU than from Wesley and the provision of IZ units.

Wesley has stated that productive coordination with AU has subsequently taken place related to operations, construction, and issues related to the AU community. The discussions have also included the use of AU shuttle bus by the Wesley community. AU would retain all discretion over the shuttle operations.

Racial Equity Tool Part 3 – Rock Creek West Planning Area Data

Part 3 of the Racial Equity Tool asks for disaggregated data to assist the Commission in its evaluation of zoning actions through a racial equity lens for the planning area. The data source is the 2012-2016 and 2019-2023 American Community Survey 5 Year Estimates, available via the OP State Data Center ([ACS DATA](#)). Part 3 also asks if the planning area is on track to meet affordable housing goals, and whether the data shows any “intersectionality of factors such as race, ethnicity, age, income, gender, or sexual orientation within the area of the zoning action and how might the zoning action impact the intersection of those factors”.

Population by Race or Ethnicity

The site is in the Rock Creek West Planning Area (RCW). Table 1 below indicates that the area is not experiencing population growth. In 2012-2016, the Planning Area had a population of 91,389 or 13.9% percent of the District-wide total. In the 2019-2023 period, the population decreased to 86,400 and 12.8% percent of the Districtwide total – a 1.1% decrease of the Districtwide total.

However, while the population has declined somewhat in the last 5 years, the area has become somewhat more racially and ethnically diverse. For the Planning Area population in 2019-2023, the population identifying as White decreased by 8.4% and Hispanic by 0.3% from 2012-2016. Meanwhile, the population identifying as Black increased by 1.5% and Asian by 0.3%. As with some other planning areas, the largest percent increase, 5.7%, was of persons identified as having

Two or More Races. Nevertheless, White-identifying residents continue to comprise nearly three-quarters of the Planning Area’s population.

Table 1: Race or Ethnicity Districtwide and in the Rock Creek West Planning Area (2012-2016 and 2019-2023)

Race or Ethnicity	District-wide 2012-16	District-wide Percent	RCW 2012-16	RCW Percent	District-wide 2019-23	District-wide Percent	RCW 2019-23	RCW Percent
Population	659,009	100%	91,389	13.9%	672,079	100%	86,400	12.8%
White alone	266,035	40.4%	73,607	80.5%	262,549	39.1%	62,327	72.1%
Black alone	318,598	48.3%	6745	7.4%	290,772	43.3%	7,722	8.9%
American Indian and Alaskan Native alone	2,174	0.3%	293	0.3%	2,044	0.3%	212	0.2%
Asian alone	24,036	3.6%	5,479	6%	27,465	4.1%	5,481	6.3%
Native Hawaiian and Other Pacific Islander alone	271	0.04%	0	0%	378	0.01%	9	0%
Some other race alone	29,650	4.5%	1,552	1.7%	32,338	4.8%	2,227	2.6%
Two or more races	18,245	2.8%	3,622	4%	56,533	8.4%	8,421	9.7%
Hispanic	69,106	10.5%	9,250	10.1%	77,760	11.6%	8,439	9.8%

Median Income

The Rock Creek West planning area has a higher median income than the District as a whole, as evidenced by data from both the 2012-2016 and 2019-2023 survey periods. The planning area median income, however, increased at nearly the same rate as the citywide median, but these gains were not distributed evenly across racial groups.

The 2012-2016, ACS data identify the median household income as \$118,411 for the Planning Area, which was 62% greater than the median Districtwide household income of \$72,935 (Table 2). There was a significant increase of approximately \$34,000 in the Districtwide median household income for the period 2019-2023. The Planning Area’s increase of approximately \$34,000 was generally the same as the District-wide’s but, in percentage terms, the increase was greater than the District-wide average. This may be expected, given the planning area’s high-income base and high-level of educational attainment.

The information on the table also shows that Black or African American have the lowest median income in the District as well as in the Planning Area. In fact, between the time periods Black or African Americans and Some Other Race experienced a reduction in median income. In the 2012-2016 time period, the difference between the median income of Black or African American and Whites Districtwide was approximately \$52,000. This difference significantly increases in the 2019-2023 period to an approximately \$100,000 difference. The median income in the Planning

Area for the 2019-2023 saw a similar difference in the median income for Blacks or African Americans vs Whites of approximately \$100,000.

Table 2: Median Income Districtwide and in the Mid-City Area (2012-2016 and 2019-2023)

Median Household Income	Districtwide 2012-2016	Districtwide 2019-2023	RCW 2012-2016	RCW 2019-2023
Total Median	\$72,935	\$106,287	\$118,411	\$152,529
Asian Alone	\$91,453	\$121,619	\$91,732	\$121,202
Black or African American	\$40,560	\$60,466	\$76,527	\$74,363
Hispanic or Latino	\$60,848	\$106,435	\$89,692	\$120,638
American Indian and Alaskan Native	\$51,306	\$63,617	\$47,168	n/a
Native Hawaiian and Other Pacific Islander	n/a	n/a	n/a	n/a
Some Other Race	\$48,047	\$74,754	\$100,817	\$85,465
Two or More Races	\$83,243	\$116,869	\$82,692	\$153,640
White	\$119,564	\$166,774	\$128,941	\$174,547

General Characteristics

Between 2012-2016, the unemployment rate in the Planning Area was at 3.5%, lower than the District at 8.7% (Table 3). Although the rate of the District fell in 2019-2023 to 6.5% that of the Planning Area's increased to 4.1%, but remained well below that of the District as a whole.

The housing cost burden in the Planning Area was approximately 7.5 percentage points lower than that of the District during both the 2012-2016 and 2019-2023 time periods. The poverty rate of the Planning Area 2012-2016 was lower than the District as a whole by approximately half but in the 2019-2023 period the poverty rate in the District and the Planning Area both fell making poverty level Districtwide and in the Planning Area both below 10%.

Table 3: General Characteristics of the Rock Creek West and District (2012-2016 and 2019-2023)

Characteristic	Districtwide (2012-2016)	RCW (2012-2016)	Districtwide (2019-2023)	RCW (2019-2023)
Unemployment Rate	8.7%	3.5%	6.5%	4.1%
Cost Burdened Households	38.6%	31.1%	34%	27.7%
Below Poverty Rate	17.9%	9%	14.5%	7.0%

Median Age and Vulnerable Populations

The Rock Creek West planning area's median age decreased slightly between the two study periods. In the 2012-2016 time period, the median age of residents in Rock Creek West was slightly older. However, it was slightly younger in the 2019-2023 time period. When race is considered, the data shows that the Black residents and American Indian and Alaskan Native were older than most of the other groups during the two periods. Over the two time period, the number of total percentage of vulnerable residents, those 65 years and older and those under 18 years stayed pretty constant although those within the Planning Area showed some slight increases in all categories although their percentages were lower than those District-wide.

Table 4: Median Age (2012-2016 and 2019-2023)

Median Age	District 2012-2016	District 2019-2023	RCW 2012-2016	RCW 2019-2023
Total Population	37.7	35.5	38.2	34.0
Asian Alone	36.5	35.6	37.8	34.7
Black or African American	33.4	38.1	39.1	39.9
Hispanic or Latino	28.4	32.2	33.7	32.0
American Indian and Alaskan Native	32.2	41.1	35.4	40.8
Native Hawaiian and Other Pacific Islander	30.8	n/a	n/a	n/a
Some Other Race	28.0	28.8	31.9	30.4
Two or More Races	19.8	30.8	31.1	31.0
White Alone	40.4	35.3	39.6	33.4

Table 5: Age/Vulnerable Populations in the District and the Planning Area

Vulnerable Population	District 2012-2016	District 2019-2023	RCW 2012-2016	RCW 2019-2023
Persons 65 and Older	34.2%	32.3%	20.8%	22.0%
Persons Under 18	4.5%	4.5%	1.7%	2.0%
Percent Disable	11.3%	11.0%	5.7%	7.5%

Housing Tenure

More residents in Rock Creek West own their home than in the District as a whole –53.7% compared to 41.1% in 2019-2023. However, the homeownership rate in the planning area decreased slightly over the two survey periods, while there was a small increase District-wide. The homeownership rate among White households had a slight decrease between the time periods, as opposed to citywide, where White ownership decreased by approximately 1%. Black homeownership decreased in the planning area, although somewhat less than the citywide trend. There was an increase in renter occupancy for blacks and a decrease for Whites. The Asian population has the largest increase in percentage of homeownership in the 2019 to 2023 period of 15%. Many other racial groups also experienced a slight decrease in homeownership and an increase in rentals. Some groups experienced a decrease in homeownership as well as in rentals which may indicate that persons are leaving the planning area or have changed their racial identity.

Table 6- Owner Occupied and Rental Households Districtwide and in the Planning Area

Owners/ Renters		Districtwide 2012-2016	District wide 2019-2023	RCW 2012-2016	RCW 2019-2023
Total	Owner Households	40.7%	41.1%	55.1%	53.7%
	Renter Households	59.3%	58.9%	48.2%	46.3%
Asian Alone	Owner Households	43.1%	41.4%	33.0%	48.2%
	Renter Households	56.9%	58.6%	67.0%	51.7%
Black or African American	Owner Households	46.6%	34.8%	29.3%	27.5%
	Renter Households	53.4%	65.1%	70.7%	72.6%

Owners/ Renters		Districtwide 2012-2016	District wide 2019-2023	RCW 2012-2016	RCW 2019-2023
Hispanic or Latino	Owner Households	30.9%	36.4%	51.8%	43.6%
	Renter Households	69.1%	63.6%	48.2%	56.2%
American Indian and Alaskan Native	Owner Households	32.8%	19.6%	50.8%	40.7%
	Renter Households	67.2%	80.3%	49.2%	59.3%
Native Hawaiian and Other Pacific Islander	Owner Households	9.1%	31.8%	0%	0.0%
	Renter Households	90.9%	68.2%	0%	0.0%
Some Other Race	Owner Households	17.5%	28.7%	37.3%	29.9%
	Renter Households	82.5%	71.3%	62.7%	70.1%
Two or More Races	Owner Households	32.7%	41.3%	33.8%	47.0%
	Renter Households	67.3%	58.7%	66.2%	53.0%
White Alone	Owner Households	47.8%	48.0%	59.9%	58.8%
	Renter Households	52.2%	52.6%	41.2%	57.6%

The rising cost of housing in the District limits the provision of housing for a variety of household types, including family, senior housing, rental and ownership housing, and housing for all income levels. Given the land use characteristics of the District, only a small amount of the total land area (28.1 percent) is dedicated to residential use (205.3). Scarcity of land increases the cost of new housing, limits the availability of housing, and intensifies housing cost burdens, particularly for lower- and middle-income households. The Comprehensive Plan states that “*residents of color are a majority of lower-income households in the District and, therefore, face a disproportionate share of the problems caused by housing insecurity and displacement*” (206.4).

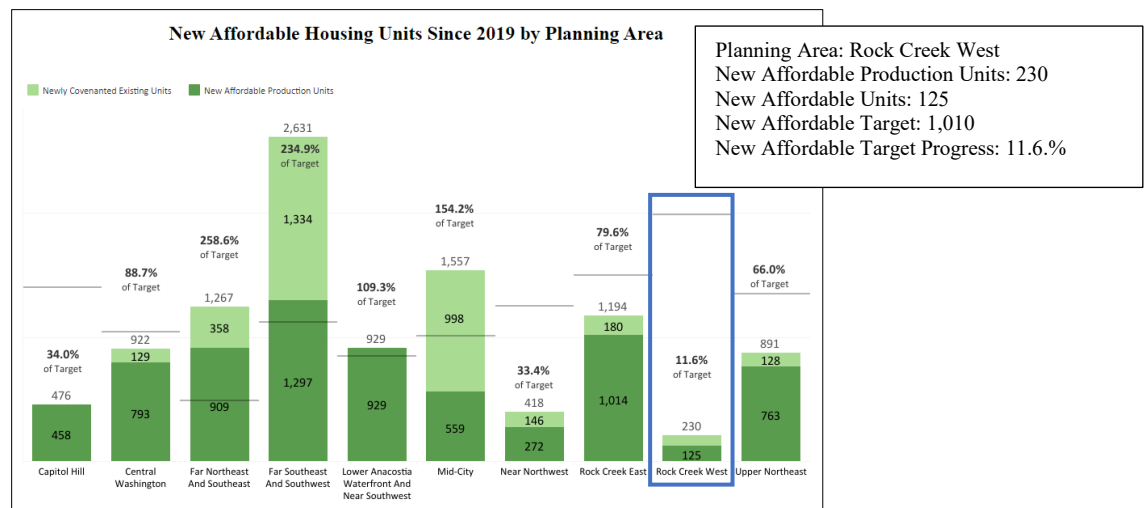
The Comprehensive Plan recognizes that without increased housing the imbalance between supply and demand will drive up housing prices in a way that creates challenges for many residents, particularly low-income residents. The proposed dormitory could free-up off-campus rental units for non-student renters. The Comprehensive Plan further recognizes the importance of inclusionary zoning requirements in providing affordable housing opportunities for households of varying income levels.

Although the proposed new dormitory would not be receiving any additional density over that allowed in the RA-1 zone for institutional uses, Wesley would provide \$8 million for off-site affordable units within Ward 3 which would otherwise not be provided if Wesley were only housing their students.

Applying the lens of racial equity to zoning actions would target support to communities of color. The Comprehensive Plan states that “*residents of color are a majority of lower income households in the District and therefore face a disproportionate share of problems caused by housing insecurity and displacement.* (206.4).

Progress Toward Meeting the Mayor’s 2025 Housing Equity Goals

Part 3 also asks if the planning area is on track to meet affordable housing goals. The Mayor’s housing goals include the production of 12,000 new affordable units citywide for households earning below 80% of Median Family Income (MFI). The Deputy Mayor for Planning and Economic Development (DMPED) provides regular updates ([DMPED 36,000 by 2025 Dashboard](#)) on how each planning area is progressing in meeting their portion of the affordable housing target. The most recent update (December 2024) indicates that the Rock Creek West planning area is, by far, more distant from achieving its goal than any other planning area. It is possible that the proposed changes to the student housing capacity on the Wesley campus may at least help the planning area to not slip farther behind compared to other planning areas.



Past Racial Discrimination

Racial covenants in neighborhoods near the Wesley campus persisted into the 1960’s. OP does not have data showing any discrimination at this site. Wesley has been active in racial and social justice outreach programs and in educating graduates who minister to minority communities. The Seminary’s students and staff are more racially diverse than the nearby residential areas. Currently, approximately 34% of Wesley’s students identify as Black as do 18% of the administration, 25% of the faculty, and 7% of other staff.

Racial Equity Tool Part 4 – Zoning Commission Evaluation Factors

According to the Racial Equity Tool, the Commission will use the following criteria, themes and questions, along with data provided in its evaluation of a zoning action’s consistency with the Comprehensive Plan, as viewed through a racial equity lens. As demonstrated above, the proposed campus plan would advance many of the policies related to racial equity in the provision of housing, job creation, and the advancement of arts and culture.

The table below addresses themes/questions based on Comprehensive Plan policies related to racial equity, that are anticipated to have positive or negative impacts and/or outcomes as a result of the campus plan.

Table 7

Factor	Question	OP Response
Direct Displacement	Will the zoning action result in displacement of tenants or residents?	The proposed dormitory would not result in displacements of residents. There are no permanent residents on the campus. The site is an educational campus and the demolition of two existing dormitories with a total of about 90 beds is proposed, all of which would be relocated and accommodated in the new 659-bed dormitory.
Indirect Displacement	What examples of indirect displacement might result from the zoning action?	OP does not anticipate indirect displacement as a result of this zoning action. Rather, the proposed new dormitory could alleviate housing pressure off-site, by providing more student housing on-site.
Housing	Will the action result in changes to: <ul style="list-style-type: none"> ▪ Market Rate Housing ▪ Affordable Housing ▪ Replacement Housing 	The new dormitory would allow the provision of 659 beds in 185 units. The provision of more student beds may have a marginally positive impact on the affordability of housing in Rock Creek West by freeing up market rate units now rented by students who may relocate to the Wesley campus. In addition, Wesley's contribution to facilitate the provision of affordable housing should help to provide additional affordable housing in the Rock Creek West Planning Area and Ward 3, and including potentially new home ownership opportunities for moderate income families.
Physical	Will the action result in changes to the physical environment such as: <ul style="list-style-type: none"> ▪ Public Space Improvements ▪ Infrastructure Improvements ▪ Arts and Culture ▪ Environmental Changes ▪ Streetscape Improvements 	Wesley proposes, along with the new dormitory, improvements to the sidewalk along Massachusetts and University Avenues; installation of signage, crosswalk and ADA curb ramps; providing additional recreational opportunities through the construction of a new neighborhood-oriented playground on the campus; planting of additional trees on the campus; and providing green roof and solar panels.
Access to Opportunities	Is there a change in access to opportunity? <ul style="list-style-type: none"> ▪ Job Training/Creation ▪ Healthcare ▪ Addition of Retail/Access to New Services 	The zoning action would lead to a temporary increase in construction jobs and a small permanent increase in jobs to supply and manage the new dormitory.
Community	How did community outreach and engagement inform/change the zoning action? <ul style="list-style-type: none"> ▪ (e.g., did the architectural plans change, or were other substantive changes made to the zoning action in response to community input/priorities etc.?) 	Since 2019 when discussions begun with the community there have been several changes made which included: <ul style="list-style-type: none"> • Amendment to restrict traffic entering and exiting from the residentially bordered University Avenue. • Residential parking permits were prohibited for all Wesley students and for AU students and immediate family members residing in the proposed dormitory.

Factor	Question	OP Response
		<ul style="list-style-type: none">• The designs for the upper stories of the dormitory were set-back farther from the residential neighborhood and their layout was changed to avoid light spillage towards the neighborhood.• The community-accessible playground was added and the previously proposed retail space in the Consolidated PUD was eliminated.• The ratio of beds to parking spaces was reduced and the Seminary agreed to keep the existing cap on student, faculty/staff enrollment. <p>No significant changes have been made since the campus plan approval but Wesley has provided an improved TDM Plan, Performance Monitoring, a Security Plan, a draft Construction Management MOU and provided additional information relating to the off-site IZ.</p>

IX. COMMENTS OF OTHER DISTRICT AGENCIES

The Department of Transportation (DDOT) has submitted a report under separate cover at Exhibit 19. DDOE comments are provided at Attachment 1.

X. ANC COMMENTS

The campus is within the boundaries of ANC 3E and is across the street from ANC 3D. At the time of the filing of this report, ANC had submitted comments to the record at Exhibit 20.

XI. COMMUNITY COMMENTS

At the time of this report, there are no community comments in relation to Wesley's August 8, 2025 application to further processing.

XII. Summary of Planning Context Analysis and Recommendation

As demonstrated above, on balance, the proposed further processing for the new dormitory would be not inconsistent with the FLUM institutional use designation and with the Policy Map neighborhood conservation designation. Additionally, the proposal would be not inconsistent with many of the policies and actions of the Citywide Elements and the specific recommendations for the Rock Creek West Area Element. The proposal also would not be inconsistent with the approved Campus Plan and is not likely to become objectionable to neighboring properties.

OP therefore recommends that the Zoning Commission **approve** the further processing application for the new dormitory and the campus improvements, with the following conditions, in addition to ones that may be recommended by DDOT and DOEE.

1. To meet their off-site IZ requirement, Wesley shall provide to the Department of Housing and Community Development (DHCD) \$8 million to deliver a minimum of 22,436 net square feet of affordable housing;

2. The affordable units shall be:
 - At 60% MFI for rental or 80% MFI for homeownership units;
 - Set aside for the life of the project; and
 - Located in Ward 3.
3. DHCD shall have the option to use any of the following methods to generate the affordable units:
 - DHCD's preferred option is the creation of a home purchase assistance fund available to low-income purchasers who want to buy an existing dwelling unit in Ward 3. Affordable ownership opportunities in Ward 3 are even more scarce than affordable rental properties. The funds would be available via lottery to households earning 80% MFI or less, who have received a Home Purchase Assistance Program (HPAP) notice to proceed. The funds would then be used to supplement the HPAP award toward the purchase of a home in Ward 3. In addition to the Fund, DHCD would seek a first mortgage lending partner such as the DC Housing Finance Agency (HFA). A covenant would be placed on the property requiring long-term price controls comparable with the IZ price schedule. Long term price controls would also enable reduced property tax assessment through the Office of Tax Assessments (OTA).
 - New construction of either affordable rental or ownership housing. This approach would include merging the funds with applications for DHCD's Housing Production Trust Fund, Low-Income Housing Tax Credits and other DHCD sources. This approach reduces the burden on DHCD's other sources and enables DHCD to finance more affordable units overall.
 - Conversion of existing housing to long-term affordable rental or ownership housing. This approach would include funding the acquisition of existing properties or refinancing of existing debt in order to convert the properties into long-term affordable housing. There are several properties that could potentially benefit from this approach.
 - Each approach would be enforced by covenants.
4. Wesley shall provide to DHCD the first four million dollars (\$4 million) no later than the issuance of permits or two years from the date of the order.
5. DHCD shall provide a written report to the Zoning Commission on the progress the fund makes in meeting the 22,436 square feet requirement within forty-five (45) days after the one year anniversary of DHCD having received the funds and each year after that until the funds are expended..
6. Flexibility to vary the unit mix by bedrooms needed to meet the 22,436 net square feet.
7. Flexibility to vary the unit mix in the dormitory provided there be no more than 659 beds.

ATTACHMENTS:

Attachment I –DOEE Comments

APPENDIX I: DOEE STAFF COMMENTS TO OP

DOEE Development Review Comments

ZC 23-08(A): Wesley Theological Seminary Campus Plan (2025-2035)

DOEE applauds the applicant's commitment to achieve LEED Gold certification for the proposed new building and especially appreciates that the applicant will certify the new dormitory with the LEED Multifamily Midrise rating system, which is best suited for this building type and includes features that will benefit future tenants. DOEE encourages the applicant to pursue environmental benefits beyond the LEED rating system and to set overarching sustainability goals for the campus. DOEE can assist the applicant with setting goals that align with those of other colleges and universities and the District as a whole.

DOEE commends the applicant for achieving a 0.6 GAR, which exceeds the minimum 0.4 GAR required for the zone. Stormwater management on this site is more environmentally beneficial given the project's location within the municipal separated storm sewer system (MS4). The applicant should also be aware that its location within the non-tidal MS4 requires all Major Land Disturbing activity to meet detention requirements for the 2-year storm event.

The following recommendations are intended to assist the applicant with incorporating strategies that will improve campus sustainability and minimize the applicant's impact on the environment. Many of these strategies can be financed with no upfront cost through [DC PACE](#). The [DC Green Bank](#) and the [DC Sustainable Energy Utility](#) (DCSEU) also offer innovative financial products and technical assistance to help projects gain access to capital. To learn about project-specific financing options, contact Crystal McDonald at cmcdonald1@dcseu.com or complete DCSEU's [Custom Rebate Form](#).

Please reach out to kate.tanabe@dc.gov for questions or more information.

Net-Zero Energy

Clean Energy DC, the District's detailed plan to reduce greenhouse gas emissions, calls for net-zero energy (NZE) building codes by 2026. DOEE encourages the applicant to explore net-zero energy construction/certification ahead of this planned code requirement. An NZE building is a highly energy-efficient building that generates enough on-site and procures acceptable off-site renewable energy to meet or exceed the annual energy consumption of its operations. NZE buildings can benefit both owners and tenants through significantly lower operating costs, improved occupant comfort and improved indoor air quality. Under the [2017 District of Columbia Energy Conservation Code](#), projects can use Appendix Z as an alternative compliance pathway, which provides a working definition and guidance for NZE.

DOEE has published a Net-Zero Energy Project Guide, a Multifamily Guide, and an Integrated Design Charrette Toolkit to assist project teams with planning, designing, constructing and operating NZE buildings. These and other resources can be found at doee.dc.gov/service/greenbuilding.

The following recommendations break down the energy performance, electrification, and renewable energy elements of a net-zero energy building.

Energy Performance

DOEE encourages the applicant to continue prioritizing energy efficiency as the design is finalized. Maximizing energy efficiency at the time of construction will more cost effectively assist in meeting [Building Energy Performance Standards](#) (BEPS) in the future. The BEPS program was established in Title III of the Clean Energy DC Omnibus Act of 2018. The Act states that starting in 2021, owners of buildings over 50,000 square feet that are below a specific energy performance threshold will be required to improve their energy efficiency over the next 5 years. Projects below the performance threshold will be able to choose between a performance pathway, which requires that they document a 20% reduction in energy usage over the 5-year compliance period, or a prescriptive list of required energy efficiency measures. The next BEPS will be established in 2028 and the compliance threshold will increase with each cycle. New projects are encouraged to maximize energy efficiency during the initial design and construction to meet BEPS upon completion.

Electrification

In line with the District's goal of carbon neutrality and the objectives of the [Sustainable DC 2.0](#) and [Clean Energy DC](#) plans to reduce greenhouse gas emissions, DOEE encourages the applicant to design the new building to be fully electric (i.e., eliminate the on-site combustion of fossil fuels). DOEE also encourages the applicant to develop a phase-out plan for the combustion equipment in existing campus buildings.

DOEE and DOB are evaluating options to include building electrification requirements in future code updates. Building electrification involves powering all building appliances and systems (e.g., domestic hot water, heating equipment, cooking equipment) with electricity rather than fossil fuels (e.g., natural gas or fuel oil). Efficient electric systems reduce indoor air pollution caused by combustion equipment and can save on operating costs, especially when coupled with solar energy. All-electric buildings can also save on construction costs by avoiding the need to install gas piping. It's easier and more cost-effective for new construction to be designed with electric systems than it is to retrofit buildings later, so DOEE strongly encourages projects to evaluate electric options as part of their initial energy modeling exercises. For more information about building electrification in the District, visit [this resource page](#) created by the Building Innovation Hub.

Renewable Energy

DOEE applauds the applicant for committing to integrating solar panels into a green roof on the new building. DOEE encourages the applicant to maximize the roof space covered by these features or consider additional campus areas that may be appropriate for solar panels. These strategies can be combined without diminishing a project's GAR or stormwater requirement compliance. DOEE has issued guidance on how to successfully incorporate solar into green roofs on pages 41 & 42 of the [2020 Stormwater Management Guidebook](#).

Deconstruction, Reuse, and Embodied Carbon Reduction

DOEE encourages the applicant to conduct a simple life-cycle analysis (LCA) to measure and reduce the impacts from the proposed building's structural and envelope design. An LCA is an effective tool to measure the embodied carbon, or global warming potential (GWP), of a building and its materials. An LCA can inform decisions about the selection and quantity of materials used,

and can assist with dematerialization (i.e., reducing the amount of a given material). Dematerialization reduces environmental harm and saves money.

Embodied carbon is the sum of all greenhouse gas emissions resulting from the construction of buildings, including materials and construction activities. It is estimated that 23% of the world's GHG emissions result from construction. Most of these embodied emissions are associated with the production and use of concrete and steel, common structural elements. The energy savings of a high-performance building can take decades to offset the impacts of the building's construction.

Wherever possible, DOEE encourages the reuse of existing buildings and materials because the demolition of these buildings and construction of entirely new buildings is very carbon intensive. Given that this project involves razing the multiple existing structures on-site, DOEE encourages the applicant to explore options for deconstruction and reuse or salvage of materials from the existing structure. Destruction is the process of carefully and intentionally dismantling a building rather than demolishing it. While this process is more time consuming than demolition, reusing salvaged materials can reduce construction costs, and the sale of salvaged or recyclable materials can generate additional revenue.