

# Advisory Neighborhood Commission 3D

## Government of the District of Columbia

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December 4, 2024

Chairman Hood and Members of the Commission  
Zoning Commission of the District of Columbia  
441 4<sup>th</sup> Street NW  
Washington, DC 20001

RE: Wesley Theological Seminary Text Amendments, Case #24-09

Dear Chairman Hood and Members of the Commission:

We ask the Zoning Commission to reopen the record to allow ANC3D to file this letter in response to the submission of Advisory Neighborhood Commission 3E of specific alternative text amendments in Exhibit 54.

We urge the Zoning Commission not to accept ANC3E's proposed "Version A" which would restrict in the wording of the text amendments how Wesley Seminary must meet its affordable housing commitment. While we agree that Wesley's support of affordable housing should be part of the final campus plan, we believe it is premature and unwise to include any restriction on how Wesley proposes to achieve that obligation in its final campus plan. We believe that all parties to the campus plan approval process agree that affordable housing should be part of the final campus plan, but there are many other factors that should be weighed in the Zoning Commission's final approval or disapproval of any campus plan that includes the proposed dormitory for American University and Wesley students. In our letter to the Zoning Commission of November 6, 2024 (Exhibit 35A), we have laid out these other factors in detail that have been considered in this process and, we believe, should be considered by the Zoning Commission in deciding this matter.

At the present time, none of the parties nor the Zoning Commission has Wesley's complete proposal for its campus plan, including especially its plans to meet its affordable housing commitment. It would be unfair to Wesley's effort if a provision were added to the text amendment that restricted how Wesley could propose to meet its commitment, possibly making it financially impossible for Wesley to meet this commitment and build the dormitory. While we commend our colleagues in ANC3E for their extensive work on the matter of Wesley's commitment to affordable housing, this one factor should not be elevated above all others as determining the success or failure of Wesley's proposal. Instead, we believe that all of the factors detailed in our letter and in the record of the campus plans proceedings for this project need to be weighed together, by both the community and parties to the campus plan and by the Zoning Commission. Since that full package of proposals is not yet before the Zoning Commission because it lacks Wesley's final proposal for affordable housing, a decision on the text amendment that restricts what Wesley can propose as its final submission would be premature and would prevent all the parties and the community, as well as the Zoning Commission from considering the total package as a

whole. It is possible that ANC3E and Wesley, together with the other parties, will agree on a affordable housing commitment together with the other elements of the campus plan. Even if they do not agree, all of the details of Wesley's commitments across all the elements of the campus will be in completed form when it submits its final campus plan, and the parties and the Commission can at that time consider the package as a whole.

We urge the Zoning Commission to adopt text amendments in this case that reflect the flexibility contained in ANC3E's Version B, so that no parties to the campus plan will be procedurally disadvantaged by having all this affordable housing factor decided before all parties can consider Wesley's final plan for affordable housing in the context of its entire campus plan.

Sincerely yours,

A handwritten signature in black ink that reads "Tricia Duncan". The script is cursive and fluid, with the first letters of each name being capitalized and prominent.

Tricia Duncan

Chair