



Movie Night on the Wesley Sledding Hill (2024)

## **THE WESLEY THEOLOGICAL SEMINARY**



ANSWER THE CALL

**APPLICATION FOR FURTHER PROCESSING OF  
A CAMPUS PLAN TO THRIVE IN PLACE**

**YEAR 2025 THROUGH 2035**

**Z.C. CASE NO. 23-08(1)**

**AUGUST 8, 2025**

## **I. Summary of Requested Action**

This is an application of The Wesley Theological Seminary of The United Methodist Church (“Wesley” or “Seminary”) for review and approval of a Further Processing Application for the construction of the new “university housing”<sup>1</sup> (“New University Housing”) and related campus improvement projects (“Application”) pursuant to Subtitle X, § 101.1 of Title 11, District of Columbia Municipal Regulations (“Zoning Regulations”). As discussed in detail in this statement, this Further Processing application is entirely consistent with the Zoning Commission’s approval of the 2025 Thrive in Place Campus Plan in ZC Case 23-08(1)(“2025 Campus Plan”). Specifically, this application seeks Further Processing approval of the following elements of the approved 2025 Campus Plan:

- Raze Old President’s House and Restore Site with Enhanced Landscaping and Neighborhood Playground
- Raze Carroll and Straughn Halls, Maintenance Building, and Surface Parking Lot
- Construct New University Housing for Wesley and American University Students, Faculty, and Staff
- Maintain and Enhance Green Open Space with Additional Landscaping Plan
- Implement Traffic Demand Management Plan and Performance Monitoring Plan
- Construct Public Space Improvements Requested by DDOT
- Implement Campus Security Plan

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<sup>1</sup> See 11 DCMR, Subtitle X, § 101.5 (2025).

- Implement Construction Management Plan
- Cooperation with American University
- Establish and Fund Ward 3 Inclusionary Zoning Fund to be Administered by Local Initiatives Support Corporation with Appropriate and Enforceable Monitoring Mechanisms

## **II. Site Location and Consistency with the 2021 Campus Plan**

The current Campus is comprised of Lots 6 (A&T Lots 818 and 819), 7, 8, and 9 in Square 1600 with a total area of 381,787 square feet (8.77 acres). Exhibit C. The Campus is improved with eight (8) buildings, including three student residence buildings (Straughn Hall, Carroll Hall, and the 2014 Dorm); the Library; Kresge Academic Hall; Trott Hall and Chapel; a small one-story maintenance building; and the Old President's House on University Avenue. The current total gross floor area of the Campus is approximately 166,916 square feet. All of the existing buildings were part of the original Campus project, except the new residence hall which was completed and occupied in 2014 ("2014 Dorm"). The Campus has a total of 174 surface parking spaces, including 143 in the parking lot in the center of the Campus and an additional 31 spaces located along the interior roadways. Vehicular ingress and egress is provided to and from the existing Massachusetts Avenue driveway. Vehicles leaving the Campus can only turn right onto Massachusetts Avenue. The University Avenue driveway is currently exit only for right turn only with no left turn or straight movement permitted. A limited number of delivery and service vehicles are allowed to enter the Campus from University Avenue.

This Further Processing application is consistent with and implements the approved 2025 Campus Plan for the entire campus property. The central feature of the Campus Plan is the New

University Housing and the related razes and improvements to the campus as more fully described herein.

**III. Community Outreach and Input**

For Wesley, its role in the community and relationship with its neighbors is very important and a natural extension of its ministry. Beginning with its inaugural campus plan in 2005 and over the last twenty years, this community engagement has continued through the established Community Liaison Committee (“CLC”), Advisory Neighborhood Commissions 3D and 3E, other established neighborhood organizations, including the Neighbors for Living Community, Spring Valley-Wesley Heights Citizens Association, Spring Valley Neighborhood Association, and other interested parties and individuals. This process has been candid and productive at every stage of Wesley Seminary’s evolving campus plans and will be continued throughout the processing of this application.

Outreach to the community for this proposed plan began in 2019. Although this process was slowed by an unforeseen change in development partners and the COVID-19 emergency, these meetings were fully renewed in 2021 and continues to be extensive, including at least forty-six formal meetings (CLC-20; ANC 3D-22; ANC 3E-4) and more numerous informal meetings and discussions.

Date	Meetings / Presentations
July 30, 2019	CLC Meeting
April 1, 2020	CLC Meeting
December 1, 2020	Meeting with Troy Kravitz, ANC 3D02, Elizabeth Pemmerl, ANC 3D03-Elect
January 14, 2021	CLC Meeting
February 3, 2021	ANC 3D Meeting

Date	Meetings / Presentations
February 18, 2021	CLC Meeting
September 9, 2021	CLC Meeting
October 21, 2020	CLC Meeting
November 3, 2021	ANC 3D Meeting
December 8, 2021	ANC 3D Meeting
February 16, 2021	CLC Meeting
March 2, 2022	ANC 3D Meeting
March 9, 2022	CLC Meeting
March 30, 2022	CLC Meeting
April 6, 2022	ANC 3D Meeting
April 21, 2022	ANC 3E Meeting
May 9, 2022	CLC Meeting
May 12, 2022	CLC Meeting – Transportation Focused
May 12, 2022	CLC Meeting
May 24, 2022	CLC Meeting
June 1, 2022	ANC 3D Meeting
September 7, 2022	ANC 3D Meeting
November 2, 2022	ANC 3D Meeting
January 31, 2023	PUD 101 Introduction by OAG, ANC 3D
February 8, 2023	CLC Meeting
March 22, 2023	CLC Meeting
April 4, 2023	ANC 3D Meeting
May 3, 2023	ANC 3D Meeting
May 15, 2023	CLC Meeting
July 5, 2023	ANC 3D Meeting
July 25, 2023	ANC 3E Meeting
August 8, 2023	CLC Meeting
August 14, 2023	ANC 3D Meeting
September 6, 2023	ANC 3D Meeting
February 7, 2024	ANC 3D Meeting
March 4, 2024	CLC Meeting
March 6, 2024	ANC 3D Meeting
April 3, 2024	ANC 3D Meeting
April 11, 2024	ANC 3E Meeting
May 1, 2024	ANC 3D Meeting
July 10, 2024	ANC 3D Meeting

Date	Meetings / Presentations
September 23, 2024	ANC 3E Meeting
January 8, 2025	ANC 3D Meeting
February 20, 2025	CLC Meeting
April 2, 2025	ANC 3D Meeting
May 7, 2025	ANC 3D (scheduled)
May 8, 2025	ANC 3E (scheduled)
June 18, 2025	CLC Meeting (CTR)

Feedback from the community has resulted in changes to the New University Housing’s design, including setback and orientation, reduction in height, gross floor area, and parking spaces, additional landscaping and increased Green Area Ratio, enhanced sustainability, public space and pedestrian improvements, and the inclusion of a community playground. Additionally, the Seminary continues to discuss the provision of support for affordable housing within Ward 3 with the ANCs and others.

**IV. Further Processing Approval - Project Description**

This further processing application is intended to obtain approval for implementation of all elements of the approved 2025 Campus Plan, including:

**A. Raze Old President’s House and Restore Site with Landscaping**

The Old President’s House is located on the three lots on University Avenue. This two-story, 4,538 square-foot building is no longer habitable and has not been used for its intended purpose for twenty years. The building and associated paved parking area and University Avenue curb cut will be razed. This area will be re-landscaped, including a small community playground to maintain and enhance the existing Green Open Space along University Avenue.

Exhibit F (Landscape Plan, Playground, GAR).

B. Raze Carroll and Straughn Halls, Maintenance Building and Surface Parking Lot

The two 1960 – era original dorms, Carroll Hall (27,533 square feet) and Straughn Hall (29,866 square feet), that surround the existing surface parking will be razed. Together, these two-story buildings provide ninety beds. Carroll Hall is significant to the Seminary’s housing inventory because it provides family-style units for married students and their families.

Replacement of this critical family housing will be facilitated by the proposed New University Housing.



Carroll Hall Family Apartments, above; Straughn Hall, below.



At the center of the Campus, the surface parking lot with 143 spaces and adjacent one-story maintenance building will also be demolished.

C. New University Housing for Wesley and American University Students, Faculty, and Staff

The New University Housing (e.g. dormitory) is exclusively for Wesley and American University (“A.U.”) students, faculty, and staff needing local housing and will be located in the area of the existing surface parking lot. The building will be seven stories with an height of 74 feet, 8 inches, and nestled between the existing Seminary buildings and the immediately adjacent and taller A.U. buildings. Exhibit G (Architectural Plans, Elevations, Sections). The originally proposed habitable penthouse top level (17,183 square feet) has been eliminated from the plan. This purpose-built university housing will be approximately 282,061 square feet and have approximately 215 living units configured in studio, one-bedroom units, and two, three, four, and five bedroom co-living units with a total of no more than 659 beds. Each unit will provide a kitchen and the co-living units will include an additional common area as well as private key entry bedrooms and baths. At the urging of the community, the top levels of the building facing University Avenue have been further setback 27.5 - 32.5 feet from the University Avenue face of the building by eliminating four units with twenty beds. Additionally, the layout of the top-level units has been rotated ninety-degrees so that windowless walls now face University Avenue, the top/penthouse level was most recently eliminated reducing the building GFA by 17,183 square feet. Finally, 99 spaces have been eliminated from the underground parking garage. The building will have two levels of underground parking with 264 parking spaces and internal loading and trash facilities. Approximately 77 of the parking spaces are replacement spaces for Wesley’s exclusive use. Additionally, the Seminary’s maintenance facilities and storage will be located in the underground parking garage.

The new building will be first-class university housing with amenities, including purpose-designed study areas with group and individual spaces, a computer lounge, activity club room,

and an outdoor interior courtyard. The New University Housing will include an access security system and security cameras will be installed throughout the Campus. The building design will be compatible and complementary to the existing Wesley buildings and will focus on sustainability and is designed to achieve the equivalent of LEED Mid-Rise Residential Gold certification ensuring it meets high standards for energy efficiency and environmental performance. The building will utilize environmentally-preferred materials and will feature rooftop solar panels, green roof, advanced stormwater management systems, and bioretention facilities. The Campus will achieve a Green Area Ratio of at least 0.60 – above the minimum 0.40 required. Exhibit F (Landscape Plan, Playground, GAR).

The New University Housing will be developed through a long-term (99 year) ground lease for a portion of the Campus (Lot 819) between Wesley Seminary and Landmark Properties (“Landmark”). Wesley Seminary will receive a lump sum initial payment and annual guaranteed ground rent payments. Landmark will be responsible for the construction and operation of the new building. Use of the ground lease property is strictly and perpetually limited to first-class university housing and subject to approval of this Application by the Zoning Commission. At the conclusion of the ground lease, ownership of the building will revert to Wesley Seminary. For colleges and universities nationwide, it is now common practice to rely on private companies to provide customary campus services, including housing, food service, bookstores, and personal and convenience services.

The Seminary is currently tax exempt for its real estate and operations in the District of Columbia. Under the recorded ground lease for the New Dormitory (Lot 819), Landmark will not be tax exempt and will be liable for substantial annual District taxes on the land, improvements and operations for the New University Housing.

D. No Development of University Avenue Residential Lots

The three residential lots on University Avenue (Lots 7, 8 and 9) were re-incorporated in the Spring Valley Campus in 2012 in Zoning Commission Case Number 05-40A. After the demolition of the Old President's House, there is no plan to develop these lots for campus use, except for the proposed neighborhood playground and landscaping. The three lots will remain part of the Green Open Space along University Avenue.

E. Maintain "Hilltop" Campus

Under this Plan, the established building perimeter formed by the 2014 Dorm, Kresge Hall, Trott Hall, Chapel, Library and A.U. Campus is maintained with the New University Housing located in the central core of the existing Campus. The Hilltop Campus is surrounded by and isolated from the adjoining neighborhood by the substantial Green Open Space on Massachusetts Avenue and University Avenue. Exhibit H (Massachusetts and University Avenues Street Views of Hilltop Campus).

F. Maintain and Enhance Green Open Space Buffer Zone on University Avenue and Massachusetts Avenue

The Green Open Area that defines the Spring Valley Campus will be maintained and enhanced. No development is proposed for the Green Open Space which is notable for its abundant Heritage (27) and Special (76) Trees and landscaping that was previously enhanced under the 2012 Campus Plan. Under this Plan, even more landscaping will be added at the former Old President's House site, along University Avenue, at the University Avenue driveway and site of the formally proposed Administration and Maintenance Building, and at the Massachusetts Avenue entrance. Exhibit F.

The existing Green Open Space and enhancements will create a larger and more sustainable buffer for the neighborhood, especially on University Avenue. From the 2014 Dorm to the east curb of University Avenue it is 171 feet, and to the west curb of University Avenue 205 feet. From the New University Housing, it is 300 feet (a football field length) to the east curb of University Avenue. From the New University Housing across Massachusetts Avenue and the AU property, it is approximately 660 feet (more than two football fields) to be nearest residential properties in the 4400 block of Sedgwick Street, N.W. Fully fifty-three (53) percent of the Spring Valley Campus area (205,000 square feet or 4.7 acres) will remain undeveloped and devoted to Green Open Space. In addition to the Green Open Space, there will be an additional 37,000 square feet of formally landscaped area on the campus.



**ULTIMATE OPEN SPACE EXHIBIT**

WESLEY THEOLOGICAL SEMINARY

4500 MASSACHUSETTS AVE NW, WASHINGTON, DC 20016



## G. Enhanced Landscaping Plan

The entire Wesley campus and especially the perimeter Green Open Space enjoys a mature and well-maintained forestation and landscaping, including a remarkable twenty-seven (27) Heritage and seventy-six (76) Special Trees. Exhibit F. The updated Landscape Plan preserves, protects and builds upon the existing landscaping and enhances that landscaping with targeted new landscaping. The New University Housing and campus core will be substantially landscaped. More significantly, substantial additional landscaping will be added along University Avenue focused on the University Avenue driveway and street frontage and at the location of the Old President's House and new Neighborhood Playground. Exhibit F. The impact of this new landscaping is to enhance the natural buffer between the Campus and the Spring Valley neighborhood. The tree replacement ratio is 4.5 new trees for every one tree removed. No Heritage trees are to be removed. The project is currently planning to preserve 177 existing trees (to include 27 heritage trees and 76 special trees) and remove 22 trees with this project. The current landscape/GAR plan is proposing to replant a minimum of 100 trees (combination of canopy trees and understory trees) to achieve a GAR of at least 0.60. Exhibit F.

## H. Neighborhood Playground

The Spring Valley neighborhood has requested that the Seminary build and maintain a small neighborhood playground on the Wesley Campus as a community amenity. In addition to its much enjoyed "Sledding Hill", Wesley Seminary is pleased to dedicate the space and the improvements for this new neighborhood serving project. The proposed neighborhood playground would be setback back approximately forty feet from University Avenue in the area of the three former residential lots. The playground will measure approximately 40 feet by 95

feet and have an area of approximately 3,800 square feet with a natural double shredded hardwood mulch safety surface surrounded by a 48-inch-tall vinyl-coated chain link perimeter fence. It will include benches and play equipment suitable for toddlers and young children. The playground will have a public point of entry adjacent to University Avenue, N.W. by means of an accessible sidewalk. It will be fenced and open to the public only during daylight hours. The final design of the playground will be substantially in accordance with Exhibit F and will include community input.

I. 300,740 Square Feet of Unused Gross Floor Area

By maintaining the substantial Green Open Space and limiting the size and location of new development, Wesley Seminary has not utilized a substantial level of the permitted 1.8 FAR for the Campus. As proposed, total development is limited to about 387,040 square feet or 1.014 FAR. As a result, more than 300,740 square feet of development potential will remain unused.

<b>Wesley Campus Area</b>	
Lot 6 A&T Lot 818 (WTS) – 243,124 sq. ft. A&T Lot 819 (Landmark) – 113,758 sq. ft.	356,882 sq. ft.
Lot 7	9,000 sq. ft.
Lot 8	8,000 sq. ft.
Lot 9	7,996 sq. ft.
Total Campus Land Area	381,878 sq. ft. (8.78 acres)
Total GFA @ 1.08 FAR	412,428 sq. ft.
Total GFA @ 1.8 FAR (Campus)	687,780 sq. ft.

<b>Current / Proposed Development GFA</b>		
<b>Building</b>	<b>Current</b>	<b>Proposed</b>
Straughn Hall	29,866 sq. ft.	0 sq. ft.
Carroll Hall	27,533 sq. ft.	0 sq. ft.
Old President House	4,538 sq. ft.	0 sq. ft.
Library	16,630 sq. ft.	16,630 sq. ft.
Trott Hall / Chapel	26,335 sq. ft.	26,355 sq. ft.
Kresge	32,819 sq. ft.	32,819 sq. ft.
2014 Dorm	29,195 sq. ft.	29,195 sq. ft.
New Admin Building	0 sq. ft.	0 sq. ft.
New Dormitory	0 sq. ft.	282,061 sq. ft.
<b>Total</b>	<b>166,916 sq. ft.</b>	<b>387,040 sq. ft. (1.07 FAR)</b>
Unused Campus GFA	--	300,740 sq. ft.

J. Implement Transportation Demand Management and Performance Monitoring Plans

Transportation Demand Management

In close consultation with DDOT, Wesley has accepted and will implement the “robust” Transportation Demand Management (TDM) Plan in order to reduce travel demand or to redistribute demand to other times or spaces. TDM elements typically focus on reducing the demand of single-occupancy, private vehicles during peak period travel times or on shifting single-occupancy vehicular demand to off-peak periods. Beyond the enumerated TDM, Wesley will explore other innovative TDM strategies and will coordinate the implementation of those strategies with goDCgo and DDOT’s TDM Team.

- Unbundle the cost of vehicle parking from the lease for each residential unit and charge a minimum rate based on the average market rate within a quarter mile. Only monthly or by semester rates will be charged. Free parking, validation, or discounted rates will not be offered.
- Of the 264 parking spaces within the Project’s garage, at least six (6) will have electrical vehicle charging stations per DDOT’s recommendation of one (1) charging station for every 50 parking spaces.
- Will work with American University to allow occupants of the New University Housing, including WTS students, faculty, and employees to use the AU shuttle to the Metrorail Station.
- Identify a Transportation Coordinator for the WTS campus. The Transportation Coordinator will act as a point of contact with DDOT, goDCgo, and Zoning Enforcement.
- Will provide Transportation Coordinator’s contact information to goDCgo, conduct an annual commuter survey of employees on-site, and report TDM activities and data collection efforts to goDCgo once per year.
- Transportation Coordinator will develop, distribute, and market various transportation alternatives and options to the residents, including promoting transportation events (i.e., Bike to Work Day, National Walking Day, Car Free Day) on property website and in any internal building newsletters or communications.

- Transportation Coordinator will receive TDM training from goDCgo to learn about the transportation conditions for this project and available options for implementing the TDM Plan and PMP.
- Provide residents who wish to carpool with detailed carpooling information and will be referred to other carpool matching services sponsored by the Metropolitan Washington Council of Governments (MWCOG) or other comparable service if MWCOG does not offer this in the future.
- Will meet ZR16 long-term bicycle parking requirements by providing at least 62 long-term spaces free of charge to residents. At least 50% of long-term spaces (at least 31 spaces) will be located horizontally on the floor of the bike room. At least 10% of long-term spaces (at least 6 spaces) will be served by electrical outlets for e-bikes/scooters. At least 5% of long-term spaces (at least 3 spaces) will be designed to accommodate larger cargo/tandem bikes (10 feet by 3 feet size). Each bike storage room will include a repair station.
- Will meet ZR16 short-term bicycle parking requirements by providing 12 short-term spaces via exterior bike racks on-campus.
- Provide welcome packets to all new residents that should, at a minimum, include the Metrorail pocket guide, brochures of local bus lines (Circulator and Metrobus), carpool and vanpool information, CaBi coupon or rack card, Guaranteed Ride Home (GRH) brochure, and the most recent DC Bike Map. Brochures can be ordered from DDOT's goDCgo program by emailing [info@godcgo.com](mailto:info@godcgo.com).
- Transportation Coordinator will subscribe to goDCgo's residential newsletter.
- Post all TDM commitments on the WTS website and resident message board, publicize availability, and allow the public to see what commitments have been promised.
- Offer a free SmarTrip card to every new resident and a complimentary Capital Bikeshare coupon good for one ride.
- Fund and install a 19-dock Capital Bikeshare (CaBi) station with 12 bikes and fund one-year of maintenance and operations costs on the campus, or at a location to be selected by DDOT.
- Additional scooter parking will be available outside the Wesley Library within a designated scooter corral.
- A ride share turn around area is proposed for convenient pick-up/drop-off operations.

- Install three (3) inverted-U bike racks near the entrance to the playground on University Avenue, either in the public right-of-way or on private property.

### Performance Monitoring

This Performance Monitoring Plan (PMP) is Wesley Theological Seminary's plan to track progress towards its Transportation Demand Management (TDM) goals. The PMP is comprised of mode split surveys of students, internal Wesley data, and manual counts of vehicle and bicycle parking inventory and occupancy which will be compiled into monitoring reports submitted to DDOT. The purpose of the monitoring reports is to make data-driven decisions about which TDM measures, if any, need to be adjusted to meet TDM goals.

Beginning the first spring semester following opening of the New University Housing, monitoring will be performed, and reports will be prepared and submitted to DDOT annually until the trip goal has been met for two (2) consecutive years and then every other year for the duration of the term of the Campus Plan. As detailed in the April 29, 2022 Comprehensive Transportation Review and subsequent DDOT reports for the currently proposed campus plan, the proposed changes are expected to result in a net increase in vehicular trips of 14 additional morning peak hour trips and 33 additional afternoon peak hour trips. Thus, increasing the trip goal for the campus to 101 vehicle trips in either the weekday morning (AM) or weekday evening (PM) peak hours.

Wesley will be considered in compliance with the PMP if the vehicle trip goal of 101 peak hour trips is met.

The monitoring reports will include details regarding the following:

- Count of the number of morning and afternoon peak hour vehicular trips arriving at and departing from the campus;
  - Morning Peak Hour: Highest 1-hour between 6:30 AM – 9:30 AM
  - Afternoon Peak Hour: Highest 1-hour between 4:00 PM – 7:00 PM
  - Whether the campus is compliant with the PMP goals by generating no more than 101 peak hour vehicle trips during any of these periods.
- Survey to identify mode split, broken down by students and employees;
- Number of student, staff, and faculty parking permits issued;
- Student, staff, and faculty parking permit rates;
- Number of registered carpools;
- Number and location of any car-sharing spaces, alternative fuel vehicle parking spaces, carpool/vanpool spaces, and electric vehicle charging stations on campus;
- Inventory and occupancy of all on-site vehicular parking;
- Inventory and occupancy of long-term and short-term bicycle parking spaces; and
- Documentation of any changes to the overall transportation demand management (TDM) program from the previous year, including new or innovative policies being implemented but not explicitly required in the TDM plan agreed to during Zoning Commission approval.

This information will be collected using mode split surveys of students and employees, internal Wesley data, and manual counts of vehicle and bicycle parking inventory and occupancy.

K. Construct Public Space Improvements Requested by DDOT

Prior to issuance of any certificate of occupancy for any new building, Wesley will fund and construct the following pedestrian improvements:

- 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;
- Install signage, crosswalk, and ADA curb ramps on the south leg of University Avenue at the Rodman Street intersection, subject to DDOT approval; and
- Install signage, crosswalk, and ADA curb ramps on the east leg of the campus driveway at the University Avenue and Sedgwick Street intersection or construct the crossing as a continuous sidewalk, subject to DDOT approval.
- Subject to obtaining future approval from American University to use the existing gate, install wayfinding signage on the Wesley Seminary campus directing students to the gated connection to the American University campus.

L. Implement Campus Security Plan

The 2025 Campus Plan implements enhanced campus-wide security features and is integrated with the physical, personnel and operational security features of the New University Housing. Exhibit I (New University Housing Security Features). For the first time, Wesley will install a network of campus-wide security cameras which will enhance security for students, faculty, staff, residents, and visitors, provide deterrence and allow for real time monitoring. This security will be integrated with and complement the security in the New University Housing.

M. Implement Construction Management Plan

The Seminary, in conjunction with Landmark, will work with the community to finalize and implement the attached Draft Construction Management Plan. Exhibit J. The Plan

will be based on respect for its neighbors and minimizing the impact of construction activities, including establishment of neighborhood construction management committee, pre-construction meetings and notice, limiting the use of University Avenue except as absolutely required, 24-hour point of contact, construction worker and construction vehicle parking prohibited on neighborhood streets, minimize on-street truck idling, stormwater management and erosion control, and remediation of any construction related damages.

N. Cooperation with American University

Over the past year, Wesley and American University have met on multiple occasions to discuss matters related to this Campus Plan. Such discussions will continue and address specific topics related to further processing, including but not limited to operational, construction, and other issues that affect the American University community and its Campus Plan.

Wesley will provide timely updates on the discussions with AU throughout the prehearing process to OP, ANC 3D and 3E, CLC and all other interested parties.

O. Establish and Fund Ward 3 Inclusionary Zoning Fund to be Administered by Local Initiatives Support Corporation with Appropriate Enforcement and Monitoring Mechanisms

This Campus Plan raised for the first time, a question not previously contemplated in the Zoning Regulations, of IZ applicability to housing developed by or on behalf of a university that is not exclusively for its students, faculty or staff. Subtitle C, § 1001.6 (c) provides a clear exemption from IZ for “[h]ousing developed by or on behalf of a local college or university exclusively for its students, faculty, or staff.” Clearly, student housing was

intended to be exempt from IZ, but the proposed university housing to be occupied also by students, faculty and staff from a different university was not contemplated.

The Zoning Regulations and DHCD never envisioned a situation where a dormitory would house students from more than one institution or that the Inclusionary Zoning (“IZ”) would be applicable to a student housing project. In fact, DC Code does not allow college or university students to be eligible for IZ without a parent or guardian:

§ 6-1041.06. Ineligibility of Students - Notwithstanding § 2-1402.21, a person enrolled as full-time student in a college or university shall not be eligible to apply to rent or purchase an inclusionary unit unless the annual income of his or her parent or guardian would qualify under the eligibility standards established by the Mayor, or unless the student is a part of a household that otherwise qualifies for the inclusionary unit.

Faced with this unique scenario, Wesley offered to meet the spirit of IZ compliance through a privately administered and DHCD supervised student only affordable housing plan for the proposed new university housing. ANC 3E and others raised concerns about the operation and need for on campus student affordable housing. Beyond these objections, ANC 3E has championed a solution which Wesley proposes to implement as part of this application. Specifically, ANC 3E has requested that Wesley provide support for the required quantity and affordability of IZ units at an off-site location within the boundaries of its Commission or more broadly in Ward 3.

Wesley remains committed to affordable housing in the District as part of its broader religious and educational mission and accepts ANC 3E’s challenge to provide and/or support new IZ housing focused in this neighborhood. As of this writing, Ward 3 has achieved only 17 percent of its target for new affordable housing units, and this proposal will be an

important contribution to the neighborhood's diversity, equity, and inclusion. See DMPED 36,000 by 2025 Dashboard.

More broadly, the possibility of new IZ units is threatened by dramatically reduced resources, including the Mayor's proposed substantial reduction in budget funding for the Housing Production Trust Fund and the current unavailability of other affordable housing funding and financing programs.

Text Amendment Solution (ZC 24-09)

The Zoning Commission recognized the unique circumstances posed by the New University Housing and inability to provide on-campus Inclusionary Zoning by enacting new Subtitle C, § 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. (Emphasis Added)

APPLICABLE IZ REQUIREMENTS

The New University Housing will be Type 3 Construction which under Subtitle C, § 1003.1 (a) requires a minimum of ten percent (10%) of the residential gross floor area be set aside for Inclusionary Zoning units. In calculating the required level of IZ, Wesley has not exempted any of the area for exclusively Wesley units in the new building (30,513 sf.). Also, unlike other IZ projects with the affordable housing subsidized by an up to 20% bonus density, Wesley has not requested or realized any bonus density. The table below provides an Inclusionary Zoning Analysis for the New University Housing. As set forth, Wesley is proposing to provide the value of almost 11% in the form of an \$8 million proffer which exceeds the minimum 10% required, without any exemption for Wesley units or benefit of bonus density.

<b>New University Housing – Inclusionary Zoning Analysis</b>	
Proposed Total Gross Floor Area	282,061 sf
Net Residential Gross Floor Area	224,359 sf
Required IZ Set-Aside @ 10% (Type 3 Construction)	22,436 sf
Unrealized 20% IZ Bonus (Maximum)	56,412 sf
Unrealized Wesley IZ Exemption (90/659 beds = 13.6%)	30,513 sf
Estimated Value/Cost of 10% IZ @ \$325/sf	\$7,291,700

**Proposed \$8,000,000.00 IZ Off-site IZ Fund @ 325/sf = 24,615 sf (10.97%)**

**1. Proposed Ward 3 Inclusionary Zoning Fund.**

As acknowledged by the Zoning Commission during their deliberations on the Text Amendment, Wesley and Landmark are not affordable housing developers and as such cannot directly develop the offsite affordable housing. In collaboration with ANC 3E, Wesley made its best efforts to identify a Ward 3 development project(s) that would be willing to provide the offsite IZ units.

For a variety of reasons, this search proved unsuccessful. In addition to the high cost of Ward 3 affordable housing, limited potential sites, and increased cost of limited capital, Wesley encountered several obstacles that proved insurmountable. First, ongoing Ward 3 development projects were unwilling to increase their IZ programs due to the risks and delays that would be required to modify already secured project financing and in some cases the need to modify previous discretionary zoning approvals. The former Super Fresh site is one example of a seemingly good candidate, but the developer would not risk another judicial appeal after finally resolving a previous one after a lengthy zoning approval process with persistent opposition from a small community element. One developer of an ongoing Ward 3 project with its own substantial IZ component advised that substantially increasing IZ undermines the marketability of the project's market rate units. Finally, we learned from a number of developers that the timing of financial support offered by Wesley that would not be available until Wesley obtains its zoning approvals would be too late or uncertain to impact a planned or ongoing development project.

For all the stated reasons, Wesley has demonstrated “good cause shown” under § 1006.10 that the off-site IZ requirements can properly be satisfied by alternative means, including making a financial contribution deemed sufficient by the Commission as part of the Further Processing approval process.

Given these obstacles and upon the recommendation of DHCD and others, Wesley enlisted the assistance of Local Initiatives Support Corporation (“LISC”) to explore alternative means of compliance. LISC is a nationwide affordable housing community development organization that has operated in DC for 42 years. LISC has proposed to establish and administer a Ward 3 Inclusionary Zoning Housing Fund (“Ward 3 Housing Fund”) that would be

funded with a \$8 million dollar contribution from Wesley. The Ward 3 Housing Fund would be dedicated exclusively to the creation and preservation of affordable housing in Ward 3, including acquisition, construction, and/or long-term financing for qualified projects. The funding would be provided subject to covenants that ensure long-term affordability and established levels of affordability that meet or exceed the IZ requirements and be subject to DHCD review and supervision. As funds are repaid to the Ward 3 Fund, they may be recycled for new projects that meet the applicable requirements. Exhibit K (LISC Proposal for Ward 3 Housing Fund).

As will be more fully documented before and during the upcoming public hearing, the proposed \$8 million contribution exceeds the cost of the minimum level of required IZ associated with the proposed New University Housing and should be sufficient to subsidize at least the minimum level of required IZ over time in compliance with § 1006.10 with the potential additional longer-term benefits created by the revolving funds.

## **2. Operation of Ward 3 Inclusionary Zoning Fund**

LISC is a Community Development Financial Institution, certified by the US Treasury Department, with over 40 years operating in the DC market. To date, LISC DC has invested \$557 million in the District, leading to the preservation or creation of over 15,000 affordable homes. LISC has experience managing revolving loan funds, similar to the proposed Ward 3 Housing Fund. LISC DC is a fund manager of the DC Preservation Fund, a \$50 million revolving loan fund, managed on behalf of DC Department of Housing and Community Development (DHCD). To date, LISC has preserved over 1,200 of units of affordable housing through this fund.

The purpose of the Ward 3 Housing Fund will be to: *Serve as a vehicle to offer flexible, low-cost capital to promote the production and preservation of affordable housing in Ward 3. Through blending Ward 3 funds with LISC capital, the Fund will add catalytic investment into Ward 3 affordable housing.*

The Ward 3 Housing Fund will operate with the following structure.

1. Execution of Ward 3 Grant Agreement between Wesley and LISC
  - a. The Grant Agreement will outline stipulations of the funding, including resident affordability requirements and geographic requirements (ensuring projects are located within Ward 3).
2. Receipt of Funds
  - a. Wesley will wire or transfer the Ward 3 Housing Fund capital to LISC and LISC will hold in a designated account, only to be drawn for specifically qualified projects. LISC manages a myriad of distinct capital sources across its national footprint.
3. Sourcing Projects
  - a. LISC has longstanding partnerships with mission-driven developers throughout the District, including affordable developers within Ward 3. They are currently engaged in 4 projects that are challenged to secure low-cost capital to make the affordable projects sustainable over time.
  - b. While LISC anticipates news of these funds will spread quickly within the affordable development world, LISC will also share information in local convenings such as through our work with [The Coalition](#) and [The Housing Association of Nonprofit Developers](#), through promoting availability of these funds on LISC's website, and preparing and disseminating term sheets.
  - c. Given the dearth of affordable development in Ward 3, they are confident this tool will be highly sought.

4. Vetting and Underwriting Projects

- a. Each loan will undergo LISC's rigorous underwriting process to ensure alignment with LISC's mission, feasibility, compliance with the Fund's goals, as well as the long term financial and strategic viability of the project.
- b. Among the main criteria that would be required, as applicable, include securing corporate and personal guarantees, securing a lien on the property, reviewing borrower financial statements, credit reports and Real Estate Owned (REO), analyzing borrower's experience and composition of the team, as well as analyzing the timing, financial and logistical hurdles to ensure the project is able to come to fruition.
- c. Each loan will be assessed through LISC's Credit review process and Credit Committee, where the loan will undergo another analysis to ensure project viability. Should the Committee approve the loan, they will begin the closing process.

5. Closing

- a. LISC legal or outside counsel will close the loans, in conjunction with LISC program officer who completed the underwriting and LISC loan closer.
- b. During project closing, counsel will incorporate long term affordability covenants, as tied to use of Ward 3 Housing Fund. Each project will have a covenant that meets or exceeds the specified affordability guidelines and term of enforcement.

6. Repayment

- a. As loans which have incorporated Ward 3 capital are repaid to LISC, LISC will replenish the Ward 3 Housing Fund with said capital, in order for capital to be revolved into future affordable Ward 3 projects.

7. Annual Report out of Projects

- a. On an annual basis, LISC will report out Ward 3 Housing Fund metrics in order to share project successes. LISC will report on Ward 3 Loan Fund capital expended to date, amount remaining, and amount revolved back. The report will list each project financed, including affordability tiers of each property, and the number of homes created or preserved as a result of this financing.

**V. Satisfaction of Subtitle Z § 302.10 and Subtitle X § 101 Standards**

The Campus Plan approved in ZC Case No. 23-08(1) ( the”2025 Campus Plan) included the information that is required by Subtitle Z, § 302.10 (c)-(l) for Campus Plan approval. The information included in this application statement and the attached exhibits address Wesley’s satisfaction of the various conditions of the 2025 Campus Plan and the satisfaction of the further processing special exception standards enumerated in Subtitle X, § 101 and X § 901 of the Zoning Regulations.

**A. *College or University which is an Academic Institution of Higher Learning***

By Act of the General Assembly of the State of Maryland, The Wesley Theological Seminary was chartered as an educational institution of higher learning. Wesley Seminary is fully accredited by The Association of Theological Schools in the United States and Canada, the Commission on Higher Education of The Middle States Association of Colleges and Schools, The University Senate of The United Methodist Church (Board of Higher Education and Ministry), and the District of Columbia Educational Licensure Commission.

**B. *The Use is Located so that it is Not Likely to Become Objectionable to Neighboring Property***

For the reasons set forth below, the construction of the New University Housing and related campus and public space improvements is not likely to become objectionable to neighboring property.

1. Noise

Activities within the Campus Plan boundaries are centrally located and designed so as to minimize noise (and visual) impacts on the surrounding community. Exhibit H. New facilities proposed in this Campus Plan will also be centrally located and isolated from the surrounding neighborhood with minimum impact on the community in terms of noise. In an effort to reduce noise, the Seminary will continue to abide by the following measures:

- Locating Campus activities so as to satisfy the need of students, faculty and residents for a quiet and secure place to study, work and live, with attention to the need to minimize impacts on the community; and
- Locating and designing loading docks and mechanical systems to reduce, as much as possible, the noise they produce.

2. Traffic and Parking

The Seminary encourages the use of public transportation by all members of the Wesley community, while recognizing that not everyone has convenient access to public transportation and that some students, staff, and visitors must drive to campus due to other commitments, such as childcare, evening activities, disabilities, and the like. To mitigate traffic impacts of the campus on area streets, Wesley has further limited vehicles leaving the Campus from the University Avenue exit.

All students and residents on campus will be prohibited from parking on the neighborhood streets and will not be eligible to obtain Ward 3 Residential Parking Permits. As necessary, Wesley will undertake appropriate enforcement measures to address unauthorized parking on the neighborhood streets. Additionally, Wesley Seminary will implement the robust Transportation Demand Management Plan established by DDOT to meet the needs of the

campus over the ten-year term of the Plan. The effectiveness of the TDM will be monitored, verified and updated through the similarly robust Performance Monitoring Plan mandated by DDOT. Wesley and its traffic consultant, Gorove Slade, have submitted a new scoping form to DDOT and will continue to address any issues raised by DDOT.

3. Number of Students or Other Objectionable Conditions

The New University Housing and existing Wesley students on the Campus as strictly limited by the 2025 Campus Plan and the applicable conditions will isolate and focus campus activities away from the surrounding neighbors abutting the campus. All Wesley and AU students will be subject to applicable codes of conduct (Wesley, Landmark and/or AU) and enforcement measures that are warranted. As a result, objectionable conditions will be avoided, minimized or mitigated.

*C. No “Commercial” Activity on Campus*

The New University Housing approved under ZC Case No. 23-08(1) is not a commercial activity pursuant to 11 DCMR Subtitle X, § 101.5 (2025).

*D. Compliance with the Maximum Bulk Requirement*

The property within the Campus Plan boundaries is zoned RA-1. The Zoning Regulations limit campus development to an FAR of 1.8 (687,780 square feet). When added to all remaining buildings and structures on the Campus, development under this Campus Plan is well below the maximum permitted gross floor area prescribed for the Campus. Further, adding the New University Housing (282,061 sf) to the Campus brings the total gross floor area of development within the Campus Plan boundaries to a total of approximately 387,040 square feet

and an overall FAR of approximately 1.014. Approximately 300,740 square feet of available gross floor area will not be developed.

***E. Submission of a Plan for Developing the Campus as a Whole***

The Seminary's plan for developing the Campus as a whole, as required under 11 DCMR Subtitle X, § 101.8, was approved by the Zoning Commission in ZC Case No. 23-08(1). The approved 2025 Campus Plan includes details on buildings, parking and loading facilities, screening, signs, streets and public utility facilities, playground facility and a description of all activities and of the capacity of all present and proposed development. The construction of the New University Housing and related campus and public space improvements were both contemplated and approved in the 2025 Campus Plan. As set forth above, the size and height of the new housing and related campus and public space improvements are consistent with the 2025 Campus Plan.

***F. Interim and Off-Campus Land Use***

No interim or off-campus use of land is proposed as part of this application.

***G. Compliance with the Policies of the District Elements of the Comprehensive Plan***

The 2025 Campus Plan complies with the policies of the District Elements of the Comprehensive Plan. The continued educational use is consistent with the institutional designation on the Future Land Use Map of the Campus. In order to approve the Campus Plan, the Commission must find that the application is “not inconsistent with the Comprehensive Plan and with other adopted public policies . . . related to the subject site.” 11-X DCMR §§ 304.4(a), 500.3. As detailed below, the Campus Plan is not inconsistent with the Comprehensive Plan.

The District of Columbia Court of Appeals has consistently directed the Commission to review a Campus Plan application in the context of the Comprehensive Plan and other adopted public policies “as a whole” under this prong of the Campus Plan evaluation standard. That is, the Commission may find that a Campus Plan application is not inconsistent with the Comprehensive Plan even if the application presents actual or potential inconsistencies with individual objectives or elements of the Comprehensive Plan. Rather, the Commission must weigh and balance competing policy objectives and explain its analysis. As noted below, the Campus Plan is not inconsistent with the Comprehensive Plan and other adopted public policies, when reviewed as a whole.

1. *Future Land Use Map*: The Future Land Use Map (“FLUM”) includes the Campus in the Institutional Land Use Category. The Framework Element of the Comprehensive Plan, adopted in 2020, notes the following with regard to the Institutional Use Category:

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. 10-A DCMR § 227.18. A Campus Plan and further processing approval for the New University Housing is clearly consistent with and meets this standard.

The proposed Campus Plan is not inconsistent with the Institutional FLUM designation, as Wesley Seminary, including the New University Housing, is indeed an institutional use. It is one of the nation’s leading and largest graduate theological schools (most

of which are known as “seminaries” or “divinity schools”), consisting of a diverse student body and offering three Master’s degrees and a Doctor of Ministry, as well as several non-degree programs.

2. *Generalized Policy Map*: The “Generalized Policy Map” (“GPM”) designates the Campus as “Institutional Uses”. The Comprehensive Plan states that:

Much of the land identified as institutional on the map 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 buildings or facilities added. Policies in the Land Use and the Educational Facilities Elements address the compatibility of such uses with surrounding neighborhoods. 10-A DCMR § 225.22.

The Campus Plan will maintain and enhance the Seminary’s religious and educational mission and presence in the neighborhood, City-wide and beyond that is entirely consistent with the Institutional Uses designation.

3. *Land Use Element*: The Land Use Element is the cornerstone of the Comprehensive Plan. It establishes the basic policies guiding the physical form of the City, and provides direction on a range of development, conservation, and land use compatibility issues. The Land Use Element describes the balancing of priorities that must take place in order to accommodate a multiplicity of land uses within the boundaries of the District.

Colleges and Universities in general, and Wesley Seminary in particular, are a significant and vital land use in the District.

Institutional Uses occupy almost 2,300 acres - an area larger than all of Washington, DC’s retail, office, and hotel uses combined. These uses include colleges and

universities, private schools, childcare facilities, places of worship and other religious facilities, hospitals, private and nonprofit organizations, and similar entities. 317.1.

The District is home to about a dozen colleges and universities, enrolling more than 85,000 students. There are also nearly 70 non-local college and university programs that occupy space in Washington, DC. The District contains more than a dozen hospitals, some located on the campuses of its universities and others occupying their own campuses or federal enclaves. Hundreds of nonprofit and private institutions also operate within the District, ranging from private schools and seminaries to historic home museums and the headquarters of leading international organizations. Major Institutional Uses are shown on Map 37. 317.2.

Institutions make an important contribution to the District economy and are an integral part of Washington, DC's landscape and history. The colleges and universities alone employ 29,682 workers. Through partnerships with government and private industry, museums, higher education, and health care institutions provide services and resources to the community that could not possibly be provided by the government alone. 317.4.

The Campus Plan is consistent with various policies and guidance from the Land Use Element of the Comprehensive Plan, including policies related to: Transportation Impacts of Institutional Uses (*LU Policy 3.3.1*), Corporate Citizenship (*LU Policy 3.3.2*), and Non-Profits, Private Schools and Service Organizations (*LU Policy 3.3.3*).

Wesley Seminary has worked extensively with the community to develop a plan that responds to neighborhood concerns. Notably, the Seminary has reduced the height of the New University Housing and provided increased setbacks along the upper stories. The Project will include enhanced landscape buffering along the Campus perimeter, clustering the housing

interior to the lot and siting the new dorm adjacent to A.U.'s high rise New University Housing at the far northeast corner of the campus. Wesley has also committed to preserving heritage and special trees on the property, and constructing a playground for public use along University Avenue.

Educational facilities are encouraged to provide alternative transportation options to mitigate traffic and parking impacts. In this case, they will be mitigated, in part, by the reduction in FAR for the New University Housing. Additionally, the Seminary has worked diligently with DDOT to develop additional measures that have been provided in the Comprehensive Transportation Review. See Comprehensive Transportation Review, ZC Exhibits 16G, 19, 20A and 80.

4. *Transportation Element:* The Campus Plan is consistent with the policies of the Transportation Element of the Comprehensive Plan, including policies related to: Minimizing Off-Street Parking (*T Policy 1.1.8*), and Charging Infrastructure (*T Policy 5.2.2*).

The Proposed Campus Plan promotes various modes of transportation, including bicycle, pedestrian, and shuttle bus. The Project will improve pedestrian pathways and adds long-term and short-term bicycle parking spaces on campus. The underground parking in the New University Housing will provide 6-8 EV charging stations. The New University Housing will designate an on-campus ride-sharing pick-up and drop-off location and on-campus rental bike and scooter parking area.

5. *Housing Element:* The proposed Campus Plan is not inconsistent with the policies of the Housing Element of the Comprehensive Plan, which addresses the importance of housing to neighborhood quality in DC and the importance of providing housing opportunities

for all segments of the population throughout the District. In particular, colleges and universities should address the housing needs of the students and promote the use of such housing by their students. The Project will provide New University Housing consisting of approximately 215 units, consistent with the Student Housing policy (*H Policy 1.3.5*).

6. *Environmental Protection Element:* The proposed Campus Plan is not inconsistent with the policies of the Environmental Protection Element of the Comprehensive Plan. In particular, the Project would preserve existing heritage and special trees on Campus and install new landscape, maintaining the Campus' character as a wooded environment, consistent with Tree Requirements in New Developments (*E Policy 2.1.2*). Additionally, the Project would advance Support for Green Building, as proposed the New University Housing will be certified LEED Gold (*E Policy 3.2.1*).

7. *Educational Facilities Element:* The Campus Plan is consistent with various policies and guidance from the Educational Facilities Element of the Comprehensive Plan, including policies related to: Corporate Citizenship (*EDU Policy 3.2.2*), Workforce Development (*EDU Policy 3.2.3*), Universities as Community Partners (*EDU Policy 3.2.3*), University Research Partnerships (*EDU Policy 3.2.5*), Balancing University Growth and Neighborhood Needs (*EDU Policy 3.3.2*), Universities as Large Landowners and Campus Plan Requirements (*EDU Policy 3.3.3*), and Student Housing (*EDU Policy 3.3.4*).

The proposed Campus Plan advances several of these policies by allowing it to operate as an open campus for the enjoyment of both students and neighbors. Additionally, it will expand its access by providing a neighborhood playground for public use, fulfilling an important priority for the neighborhood. Wesley Seminary sponsors an internship program that

places students at non-profit and community organizations throughout the District, and students provide assistance to the mission of several churches in the area.

The Campus Plan will advance goals related to housing as well, relieving rental pressures on the neighborhood's private housing stock by developing New University Housing on the Campus.

8. *Rock Creek West Area Element:* The Campus Plan is consistent with various policies and guidance from the Rock Creek West Area Element of the Comprehensive Plan, including policies related to: Economic Development (*RCW Policy 1.1.2*), Managing Institutional Uses (*RCW Policy 1.1.8*), Conserving Common Open Spaces (*RCW Policy 1.1.9*), and Managing Transportation Demand (*RCW Policy 1.1.11*).

The proposed Campus Plan will be consistent with the Comprehensive Plan, having a height and building design that is compatible with adjacent buildings on AU's Campus, and additional landscaping and maintenance of the perimeter buffer and large trees will reduce its visual impact overall. The demolition of the Old President's House will create a larger Green Open Space, providing an additional buffer between buildings and the street.

The Seminary has worked extensively with the community to ensure that the impact of the New University Housing is mitigated to the extent possible and has agreed to: 1) not increasing enrollment on the campus; 2) provide fewer parking spaces in proportion to the number of beds in the New University Housing; 3) prohibit residential parking permits for those living or working on the Campus; 4) restrict delivery movements; 5) and redirect vehicular traffic to an access point on Massachusetts Avenue.

For the reasons noted above, and discussed in detail in Exhibit L, the Campus Plan satisfies the first prong of the three-part Campus Plan evaluation standard as being not inconsistent with the Comprehensive Plan and related public policies as a whole.

***H. Racial Equity and Comprehensive Plan Analysis.***

The Campus Plan for Wesley has been evaluated through a racial equity lens, focusing on consistency with the D.C. Comprehensive Plan (“Comp Plan”) and the Zoning Commission’s Racial Equity Tool. Exhibit L (Comprehensive Plan and Racial Equity Analysis). The analysis assesses the proposed New University Housing’s impact on housing, displacement, access to opportunities, environmental changes, and community engagement to ensure equitable development.

Key Findings:

- Housing and Displacement
  - The proposed New University Housing will replace two existing dormitories, increasing capacity from 90 student beds to 659 without causing direct displacement.
  - Indirect displacement is not anticipated, as increased on-campus student housing will reduce pressure on the surrounding rental market.
  - The plan supports the Comp Plan’s goal of expanding affordable housing by freeing up lower-cost housing in adjacent neighborhoods.
- Physical Improvements and Sustainability
  - The project will incorporate green infrastructure, including a green roof, solar panels, stormwater management systems, bioretention facilities, and tree preservation efforts.
  - The New University Housing is designed to achieve LEED Mid-Rise Residential Gold certification, ensuring energy efficiency and the use of environmentally preferred materials.
  - Public space improvements will include landscaping along University Avenue, creating a more pedestrian-friendly environment.

- Access to Opportunities
  - The New University Housing’s proximity to the Tenleytown-AU Metro station and other transit options will enhance student access to jobs, services, and entertainment across the District.
  - The project will maintain and expand on-campus employment opportunities and continue to train students for religious and social service careers.
  - Access to recreational spaces, including a new neighborhood playground, Rock Creek Park, and the Friendship Recreation Center, will provide additional community benefits.
  
- Community Engagement and Priorities
  - 20 Community Liaison Meetings and 26 ANC Meetings (2019-2025) informed the planning process.
  - Community feedback led to significant modifications, including a reduction in building height, increased setbacks, and adjustments to the New University Housing’s top floor design to minimize visual impact.
  - The proposed campus plan aligns with local priorities by ensuring institutional expansion does not negatively affect the surrounding neighborhood.
  - In conclusion, the proposed campus plan aligns with the Comp Plan’s goals and advances racial equity by increasing on-campus student housing, enhancing environmental sustainability, improving access to opportunities, and responding to community priorities. The project mitigates displacement risks and promotes equitable development, benefiting both the student population and the surrounding neighborhood.

***I. The Proposed Buildings are within the Floor Area Limit for the Campus as a Whole***

The construction of the New University Housing and related campus and public space improvements will result in the creation of 282,061 square feet of Gross Floor Area which is consistent with the 2025 Campus Plan and the total campus FAR will remain within the FAR limit of 1.014 approved in ZC 23-08(1).

***J. Referral to the District of Columbia Office of Planning, District Department of Transportation, and the Department of Energy and Environment***

The Seminary has been in ongoing discussions with DDOT regarding the 2025 Campus Plan and the preparation of a scoping form to direct the preparation of a transportation statement for this application. Wesley will also continue to meet with representatives of the Office of Planning, DDOT Urban Forestry Administration, Department of Energy and the Environment, Department of Housing and Community Development, and other District agencies.

***K. The Application is in Harmony with the General Purpose and Intent of the Zoning Regulations and Zoning Map***

The Application is in harmony with the general purpose and intent of the Zoning Regulations and Zoning Map. The proposed uses are entirely consistent with the approved 2025 Campus Plan goals of creating New University Housing to serve Wesley and AU students, faculty, and staff. Also, the Application is in compliance with the Zoning Regulations requirement for further processing approval and consistent with the relevant District Policies of the Comprehensive Plan.

***L. The Application will not Tend to Adversely Affect the use of Neighboring Properties***

The construction of the New University Housing and related campus and public space improvements will not tend to adversely affect the use of neighboring properties. The New University Housing is located immediately adjacent to the taller AU buildings in the center of the campus, surrounded by the existing Wesley buildings, setback substantially from University avenue and Massachusetts avenue and further buffered by the existing and enhanced Green Open Area. Taken together, the New University Housing has taken steps to mitigate noise, lighting, traffic, and parking adverse impacts that would affect the neighboring properties.

Additionally, the Seminary has prepared a Construction Management and Campus Security Plan that will further mitigate adverse impacts.

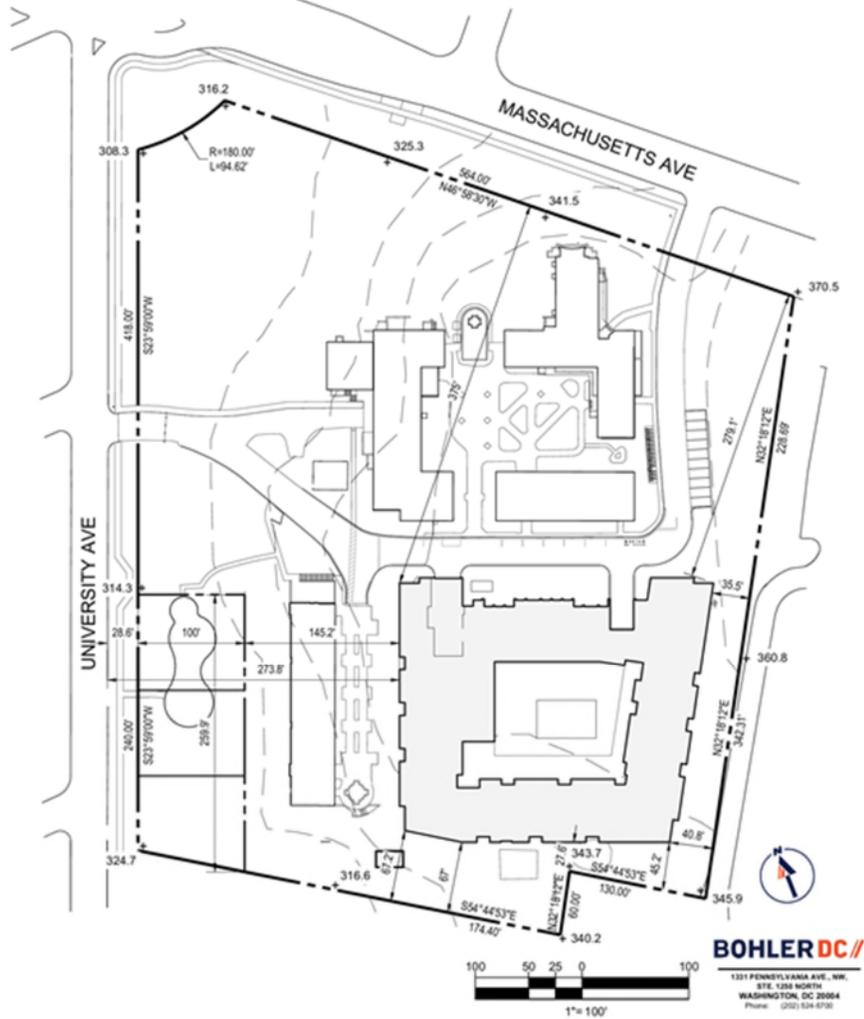
***M. Satisfaction of the Test for Minor Variance Relief***

The Zoning Regulations, under Subtitle X § 1000.3, authorizes the Zoning Commission to grant area variance relief as part of a campus plan application pursuant to the variance standards in Subtitle X § 1002.1. Specifically, Wesley is requesting an area variance for a minor deviation in the proposed height of the New Dormitory under the height restrictions in Subtitle F § 203.3 which provides:

An institutional building or structure may be erected to a height not exceeding ninety feet (90 ft.), not including the penthouse or rooftop structure, provided that the building or structure shall be removed from all lot lines of its lot a distance of not less than one foot (1 ft.) for each one foot (1 ft.) of height in excess of that authorized in the district in which it is located.

In the RA-1 Zone, the authorized height is 40 ft., subject to the provisions of § 203.3. The height of the proposed New Dormitory is 74'-8". As a result, § 203.3 requires the building to be setback 35'-0" from all lot lines. As shown on the Site Plan (Exhibit G), the New Dormitory is set back from the lot lines at least 35'-0" on the east along the north-south boundary with AU (35'-0"), on the north along Massachusetts Avenue (425' +/-) and to the west along University Avenue (300'). However, at the southern lot line the irregular "notch" in the property boundary with AU reduces the required setback to 27'-0" along only a limited portion of the lot line. Beyond the "notch" area, the setback substantially exceeds the minimum 35'-0" required. As a result, the Seminary is requesting an area variance from the height required by § 203.3.

WESLEY SEMINARY CAMPUS PLAN  
EXHIBIT E - SITE ZONING PLAN



The burden of proof for an area variance is well established. The Seminary must demonstrate that (1) the property is affected by an exceptional or extraordinary situation or condition, that (2) the strict application of the Zoning Regulations will result in a practical difficulty to the applicant, and that (3) the granting of the variance will not cause substantial detriment to the public good nor substantially impair the intent purpose or integrity of the zone plan. As set forth below, the Seminary satisfies the three-part test for the requested variance relief.

Specifically, the Seminary is affected by several exceptional conditions that both individually and taken together dictate the location of the New Dormitory. The “notch” into the property creates an anomaly or unique configuration of the otherwise continuous straight southern lot line that extends to University Avenue. As a result, several practical difficulties result. The location of the New Dormitory is restricted by the existing improvements on the Campus, including the east-west driveway and walkways, the surrounding existing buildings (Library, Kresge Hall, and the 2014 Dorm), and Heritage Tree which prevents movement of the footprint to avoid the conflict created by the “notch”. Relocation of the New Dormitory in order to comply with the 35’-0” setback would encroach on the existing improvements, undermine the preservation of the Heritage Tree, and prevent the longstanding pedestrian and vehicular circulation on the Campus. These circumstances would be unduly burdensome, if not impossible, for the Seminary to achieve. Finally, the requested variance would be a substantial benefit to the public good, not a detriment, by locating the New Dormitory immediately adjacent to the existing and taller AU buildings and in the farthest corner of the Campus from the surrounding neighborhood on University Avenue and Massachusetts Avenue. This allowance for the isolated “notch” in the property line would not impair the purpose or intent of the RA-1 zone plan which provides for regulating height at this location.

#### **VI. Satisfaction of Conditions of 2025 Campus Plan**

The Seminary is undertaking compliance with the recently approved 2025 Campus Plan initiated by and in conjunction with this Further Processing application. Although its previous Campus plan (ZC 05-40, as amended and extended) is no longer applicable, it is worthwhile to note that Wesley maintained compliance with the critical elements of the earlier plan.

Significantly, the number of enrolled students, on-campus housing and employees remained substantially below the maximum permitted levels. At all times, the required level of on-campus parking has been maintained at 174 spaces.

In response to questions raised, Wesley wants to confirm the following. First, under ZC 05-40B (2016), the traffic monitoring could be suspended when the Seminary's enrollment fell below 505. Specifically, the 505 student enrollment threshold was clearly related only to the number of Masters students in 2011-2012 and excluded doctoral and other non-degree part-time students. (ZC 05-40B, Exhibit 9 (Masters Course Students for FY 2011 reported as 505)). Based on the record in the approved Campus Plan case, the total number of Masters only students from 2016 to date has never exceeded 505 and ranged from a high of 356 (2016) to a low of 249 (2023). (ZC 23-08(1), Exhibit 96). Also, annual monitoring of Wesley parking demand was not warranted or requested. For at least the last five years, the number of parking permits issued to Masters students and employees (only regular on campus parkers) has been equal to or less than the number of parking spaces provided on campus.

## **VII. Exhibits**

The following exhibits are submitted in support of this Application:

Exhibit A: Application Signature Form

Exhibit B: Authorization Letter

Exhibit C: Building Plat

Exhibit D: Certificate of Notice of Intent and Copy of Notice

- Exhibit E: 200 Foot Property Owner List
- Exhibit F: Landscape Plan, Playground, GAR
- Exhibit G: New University Housing Architectural Plans, Elevations, Sections
- Exhibit H: Massachusetts and University Avenues Street Views of Hilltop Campus
- Exhibit I: New University Housing Security Features
- Exhibit J: Draft Construction Management Plan
- Exhibit K: LISC Proposal for Ward 3 Housing Fund
- Exhibit L: Comprehensive Plan and Racial Equity Analysis

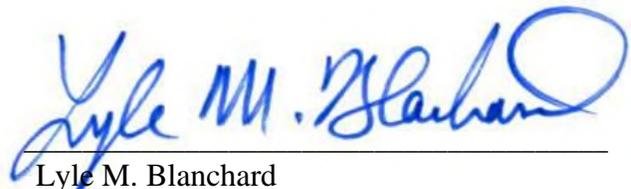
**VIII. Conclusion**

For the reasons set forth above, the Application meets the requirements for special exception approval. Wesley respectfully requests the Commission to schedule a public hearing at the earliest available date.

GREENSTEIN DELORME & LUCHS, P.C.



John Patrick Brown, Jr.



Lyle M. Blanchard