

November 22, 2024

**TO:** Board of Zoning Adjustment  
Government of the District of Columbia

**FROM:** Brandon Jamison  
Joshua Toll  
Parties in Opposition

**Subject:** BZA No. 21101 – Response to Applicant’s Nov. 15, 2024, Post Hearing  
Submission of Weekday Photos

On November 13, 2024, the BZA completed the Virtual Public Hearing for Case #21101. Following the hearing, on November 14, 2024, the BZA issued a memorandum to file, instructing the Applicant by November 15, 2024, to provide photos taken during a weekday at 8:30 a.m. and at 5:00 p.m. The memorandum provided the Parties in Opposition a deadline of Friday, November 22, 2024, to file an optional response.

On November 15, the Applicant submitted photos of the 100 and 200 blocks of Peabody St., NW, taken at approximately 9 a.m. and 5 p.m., respectively. The Parties in Opposition note that the BZA’s memorandum did not instruct the Applicant to provide photos taken at 9:00 a.m. Nevertheless, the Applicant submitted photos taken at this time, which is well-after the arrival time for Capital City and after the traffic from drop-off has subsided. The Parties in Opposition would remind the Board that the drop-off/arrival and pick-up/dismissal times for Capital City are 8:15 – 8:30 a.m., and 3:30 p.m., respectively.

The Parties in Opposition submit their own pictures, taken after the November 13, hearing and enclosed herein. The pictures submitted by the Parties in Opposition are of the 100 and 200 blocks of Peabody St., NW, and surrounding areas, including alleyways, which are consistently used by commuters to avoid the traffic and congestion on Peabody St., NW. The pictures were taken during Capital City’s arrival and dismissal times, and around 5 p.m. when pick-up would still be occurring both from Capital City’s CDC and the new CDC proposed at 245 Peabody St., NW. The pictures reflect a tumultuous atmosphere that is prone to traffic gridlock and detrimental to pedestrian- and resident-safety in and around the 100 block of Peabody St., NW, where Capital City is located. The dangerous situation on the 100 block of Peabody St., NW, was amplified by a September 30, 2024, email from Capital City’s Principal detailing safety concerns in the area that have gone unaddressed. That email is also included in the materials attached to this submission by the Parties in Opposition.

Finally, the pictures included in this submission depict a situation on the 200 block of Peabody St. NW, that is likely to devolve into the same morass presented on the 100 block of Peabody St. NW, should a new CDC the size of the one proposed by the Applicant be opened at 245 Peabody St., NW. Significantly, the pictures belie the rosy impression made by Table 1 of Applicant’s October 30, 2024, Supplemental Traffic Statement, which indicates the presence of 21, 22, 20, and 16 vacant spaces, respectively, on the 200 block of Peabody St., NW, during the peak hours of 8:15 – 9:15 a.m., Wednesday, April 3, 2024, 3:15 – 4:15 p.m., Wednesday, April

10, 2024, 8:15 – 9:15 a.m., Tuesday, September 10, 2024, and 3:15 – 4:15 p.m., Tuesday, September 10, 2024. The pictures reveal far fewer available parking spaces on the 200 block of Peabody St., NW, during peak hours, increasing the likelihood of parked cars on both sides of the street, double parking, alley usage, and other conditions that will prevent the passage of two-way traffic on the narrow, local road that is Peabody St., NW, and create hazardous conditions for pedestrians dropping and picking up children from the proposed CDC.

The Parties in Opposition implore the Board to take heed of the serious traffic and safety concerns arising out of the 100 block of Peabody St., NW, where Capital City is located, that will undoubtedly be duplicated and magnified in and around the 200 block of Peabody St., NW, should the BZA grant a special exception for an 82-student, 20-staff member CDC at 245 Peabody St., NW.

*Enclosure (1):*

Pictures Submitted by Parties in Opposition and Email from Capital City Principal

# 245 Peabody St., NW

Traffic and parking observations around the areas of:

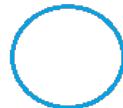
- 100 block of Peabody St., NW
- 200 block of Peabody St., NW
- 6000 block of 2<sup>nd</sup> St., NW
- 5900 block of 2<sup>nd</sup> St., NW
- Alleys adjacent to these streets

## Overview

### Color Legend



Denotes Applicant's property at 245 Peabody St., NW

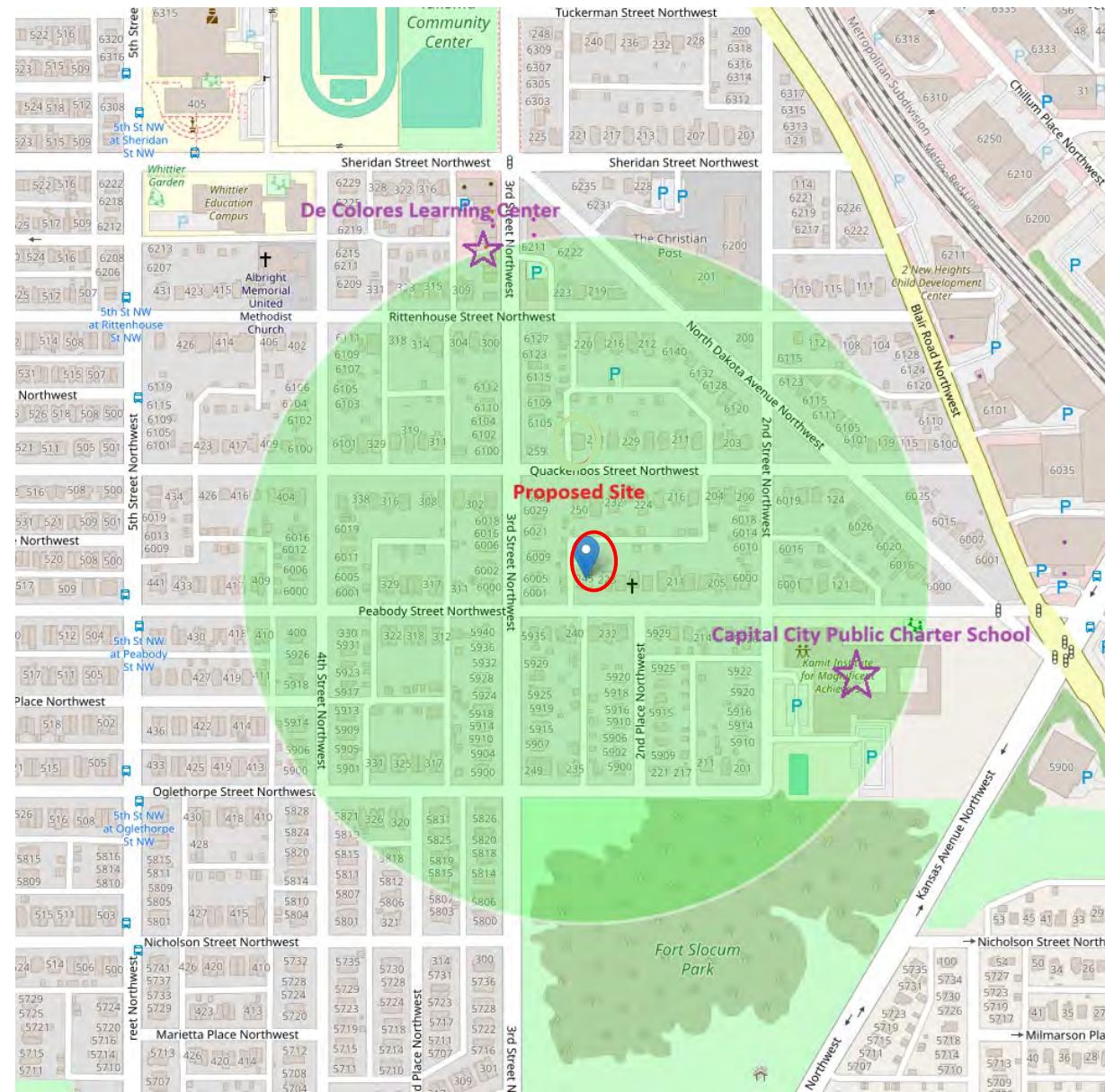


Denotes general area observed



Highlights observed traffic issue

1000 Foot Radius of 245 Peabody St., NW



## Email from CCPCS Principal detailing traffic and safety concerns

LC Laina Cox<lccox@ccpcs.org>

Reply Reply all Forward ...

To: A Johnson <twoamjohn@msn.com>

Mon 9/30/2024 3:45 PM

Cc: ATD DDOT; Cohen, Michael (SMD 4807); Johnson, Tiffani (SMD 4806); Lavenhouse, Nikki F. (MPD); jlewisgeorge@dccouncil.gov; Sebastien Durand <sebastiendurand@ccpcs.org>; +1 other

**CAUTION:** This email originated from outside of the DC Government. Do not click on links or open attachments unless you recognize the sender and know that the content is safe. If you believe that this email is suspicious, please forward to [phishing@dc.gov](mailto:phishing@dc.gov) for additional analysis by OCTO Security Operations Center (SOC).

Good Afternoon Ms. Johnson,

Thank you for reaching out and sharing your concerns. I have added our Director of Facilities and Chief Operating Officer on this thread as well, as we have been voicing these same concerns. We have been in conversations with both Tiffani and Councilwoman Lewis George regarding our safety concerns once we learned at the start of the year that we would not be granted crossing guards (as we've previously had) for 2nd St and Peabody St. This was shocking to us as we didn't have a heads up or much follow up regarding that decision. We have also voiced our worries to our School Resource Officers regarding parents not following the speed limits and parking illegally causing dangerous situations for students and other families. We have increased our staff presence outside as best as possible to support dismissal, and we have sent numerous reminders to our families regarding speeding and parking (letting them know that our neighbors would be calling for ticketing, too). We've asked MPD to ticket cars as a consequence of illegal parking and to also be present to hopefully deter speeding and/or illegal parking. Unfortunately, after five weeks of school, we have not been able to garner support from MPD or DDOT as requested by us, Tiffani, and Councilwoman Lewis George. We, too, are concerned for our students' safety and hope that collaboratively, something can be figured out.

Best,  
Laina Cox

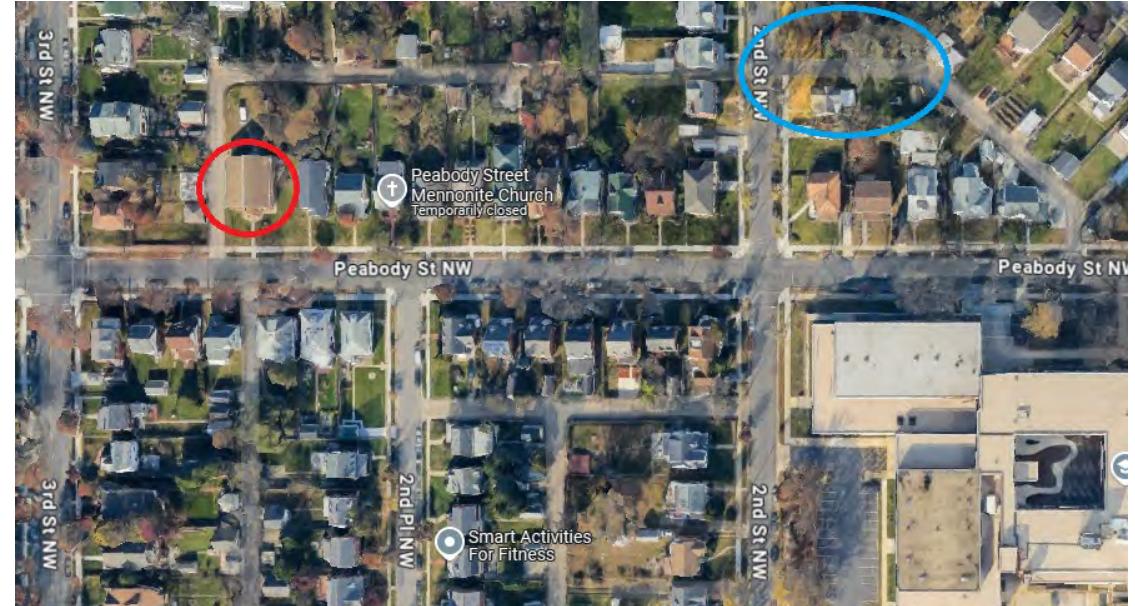
---

E-mail dated September 30, 2024

*Morning*



*Photo facing East*



**Monday, November 18<sup>th</sup> at 8:16am**  
**Alley between 2<sup>nd</sup> St., NW; Peabody St., NW; and North Dakota Ave., NW**

Significant congestion, parking issues, no DDOT TOC available

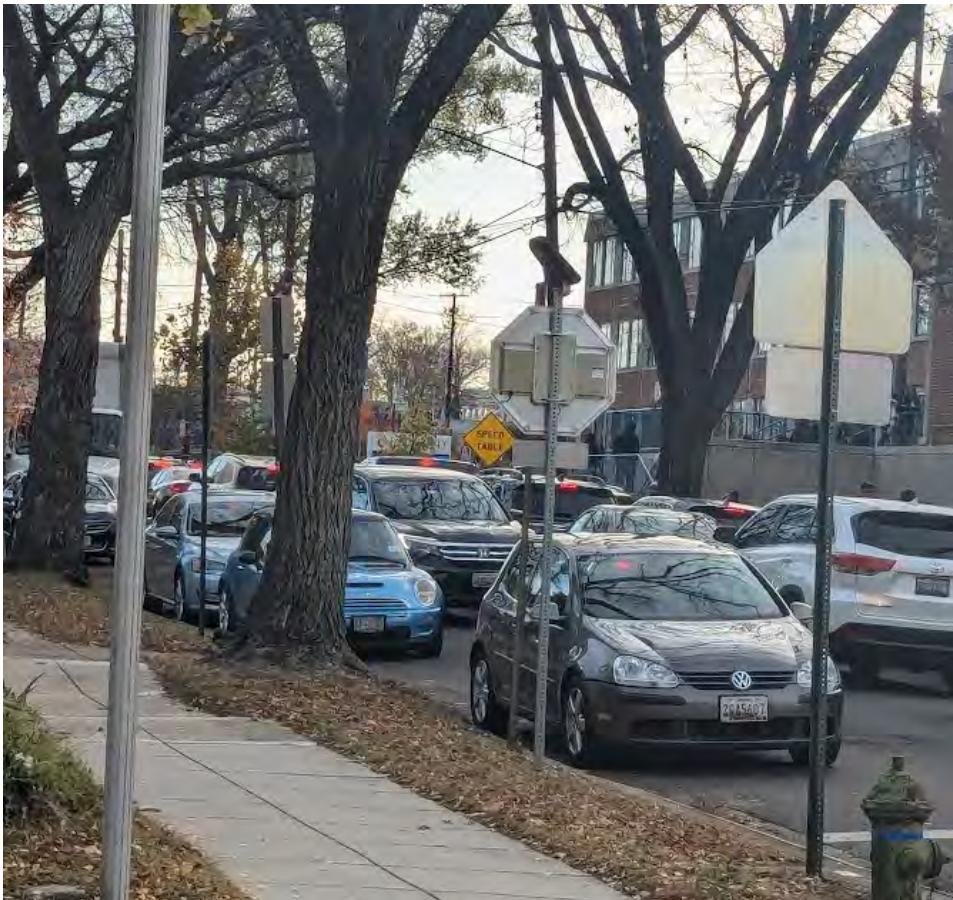
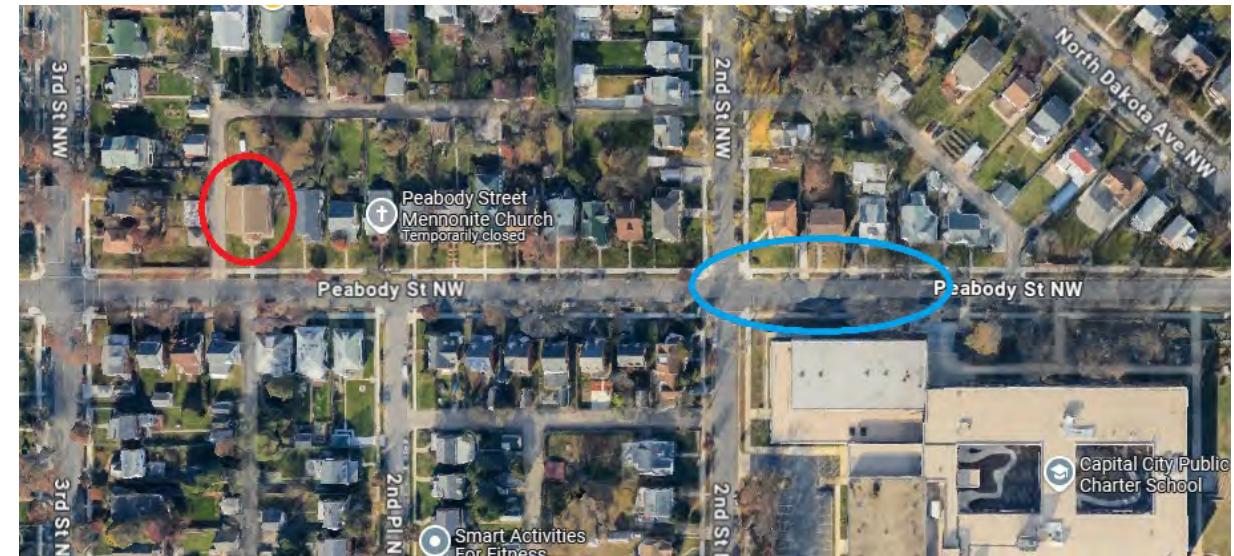


Photo facing East



**Monday, November 18<sup>th</sup> at 8:16am**  
**100 Peabody St., NW**

Significant congestion, parking issues on 100 block of Peabody St., NW that will be recreated on the 200 block with opening of new CDC



*Photos facing East on 100 block of Peabody St., NW*

**Tuesday, November 19<sup>th</sup> at 8:19am**  
During Capital City PCS Arrival

Significant congestion, parking issues on 100 block of Peabody St., NW that will be recreated on the 200 block with opening of new CDC



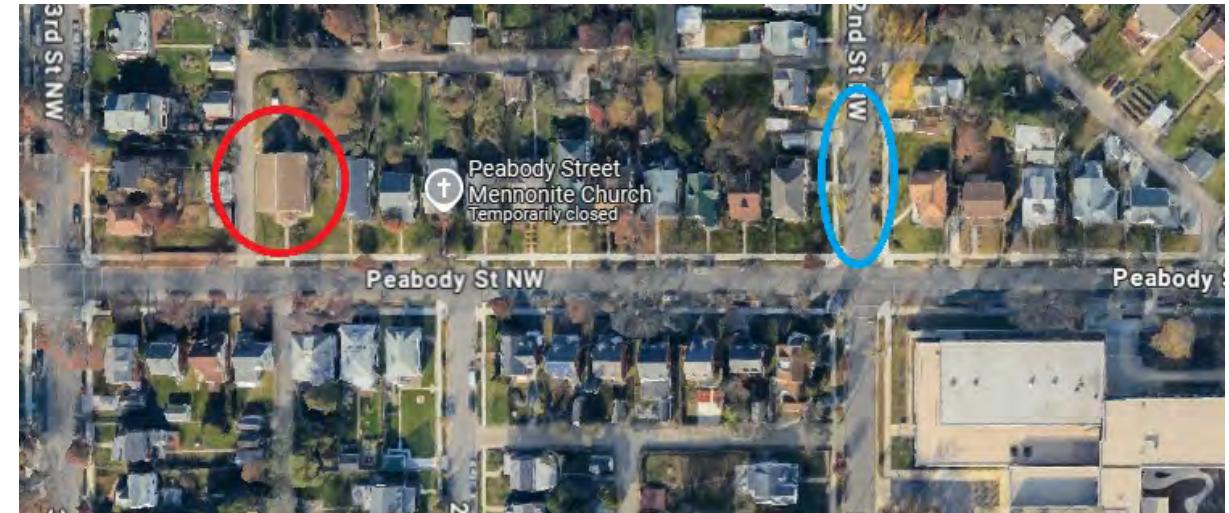
*Photo facing South on 100 block of Peabody St., NW*

**Tuesday, November 19<sup>th</sup> at 8:19am**  
During Capital City PCS Arrival

## Cars blocking Peabody St., NW Private Parking Access



*Photo facing South*

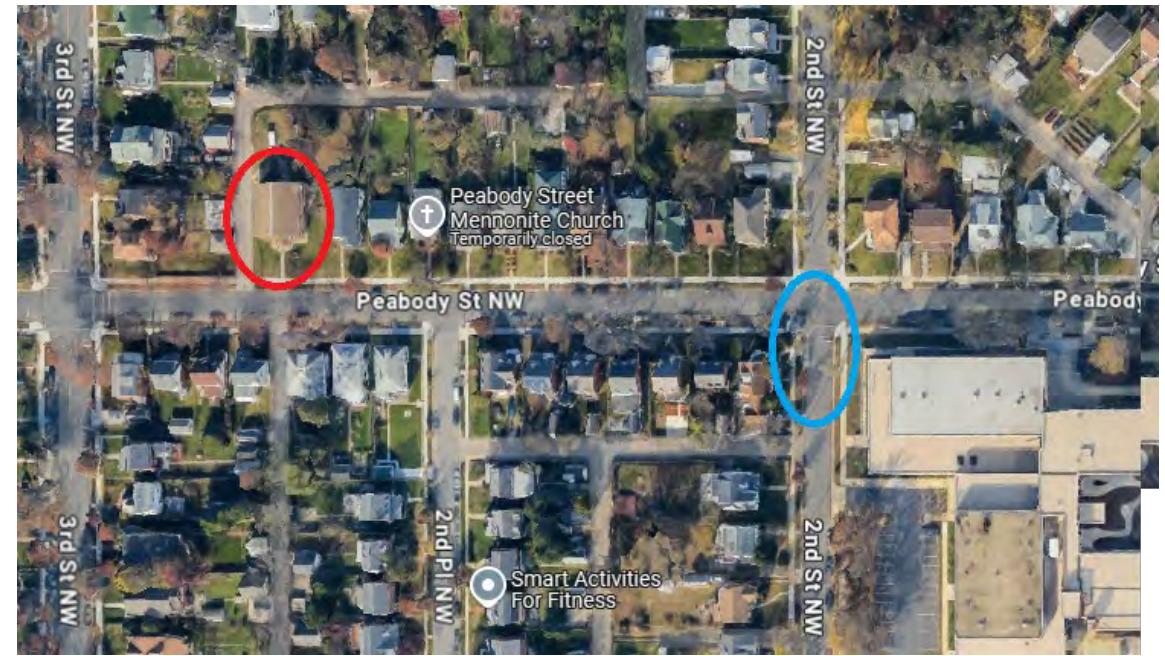


**Monday, November 18<sup>th</sup> at 8:16am**  
**6000 block of 2<sup>nd</sup> St., NW**

## General Congestion on 2<sup>nd</sup> St., NW



*Photo facing South*



**Monday, November 18<sup>th</sup> at 8:16am**  
**5900 block of 2<sup>nd</sup> St., NW**

PUDO on 200 block of 2<sup>nd</sup> St., NW, next to LED Stop Sign

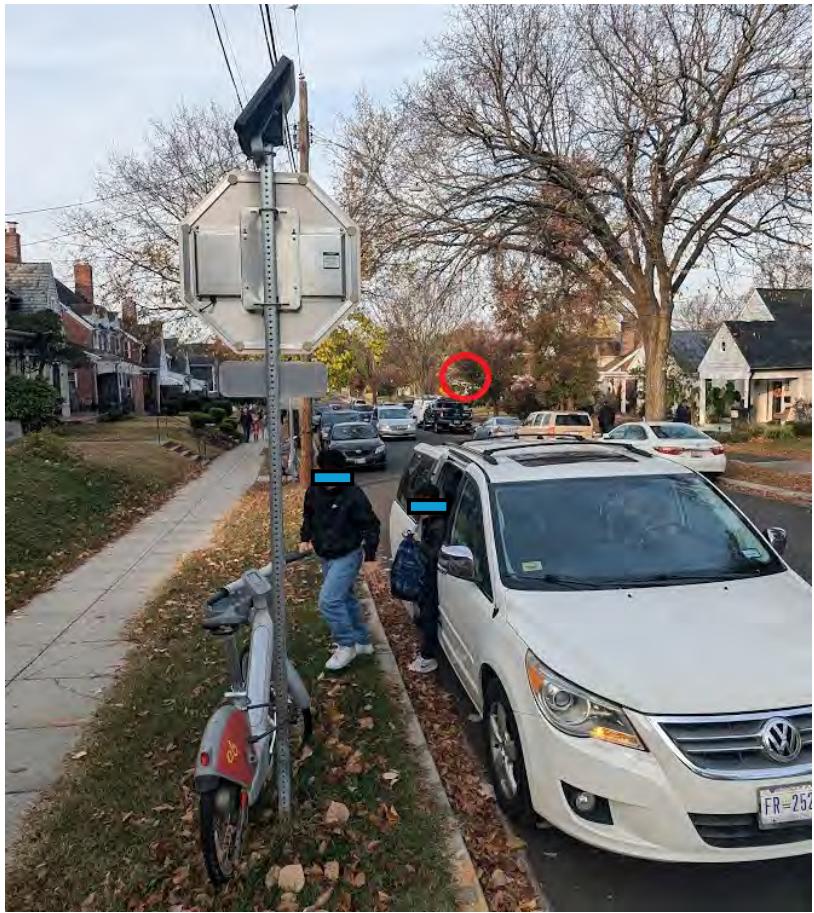
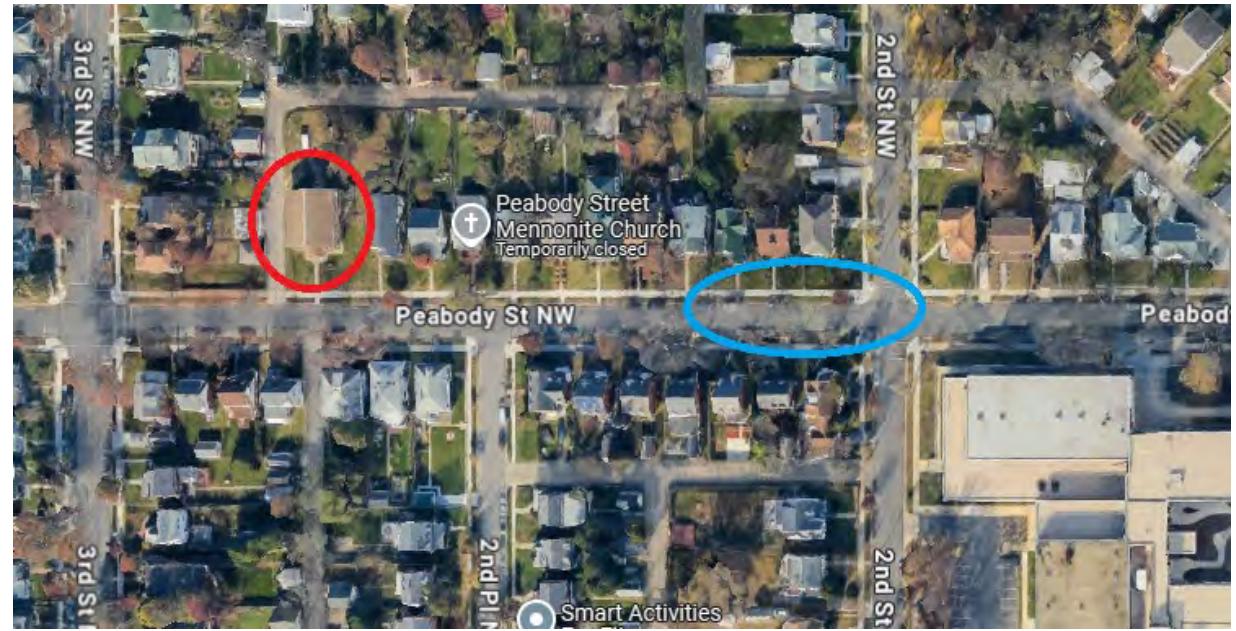


Photo facing West

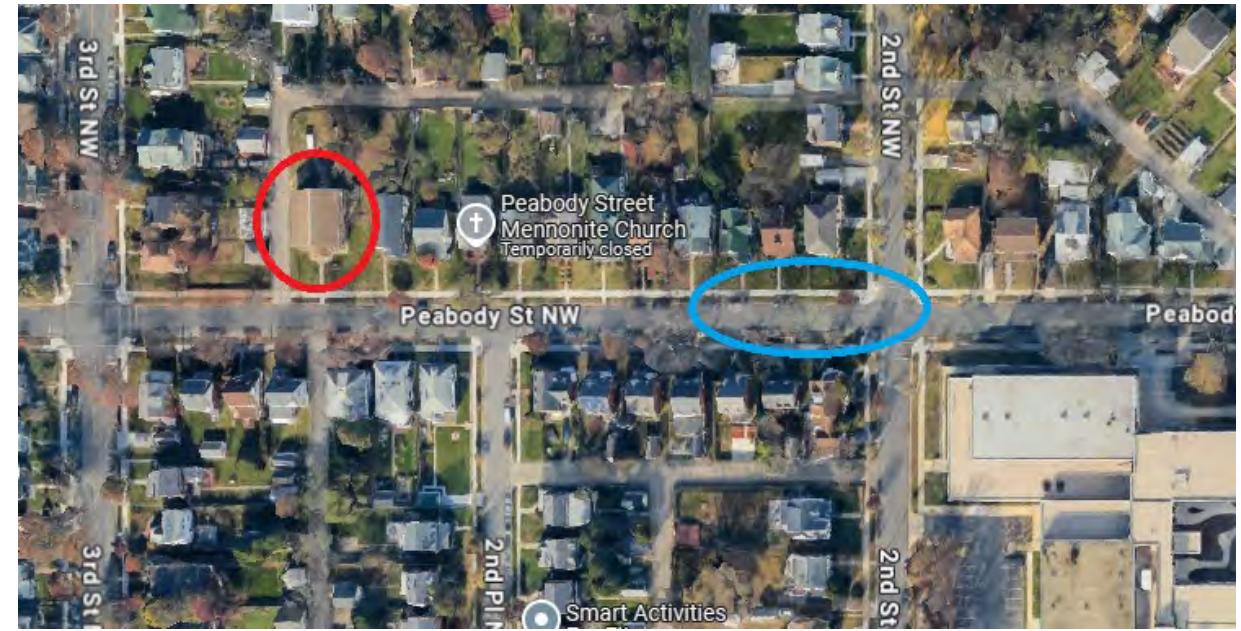


Monday, November 18<sup>th</sup> at 8:18am  
200 block of Peabody St., NW

## Congestion on 200 block of Peabody St., NW



*Photo facing West*

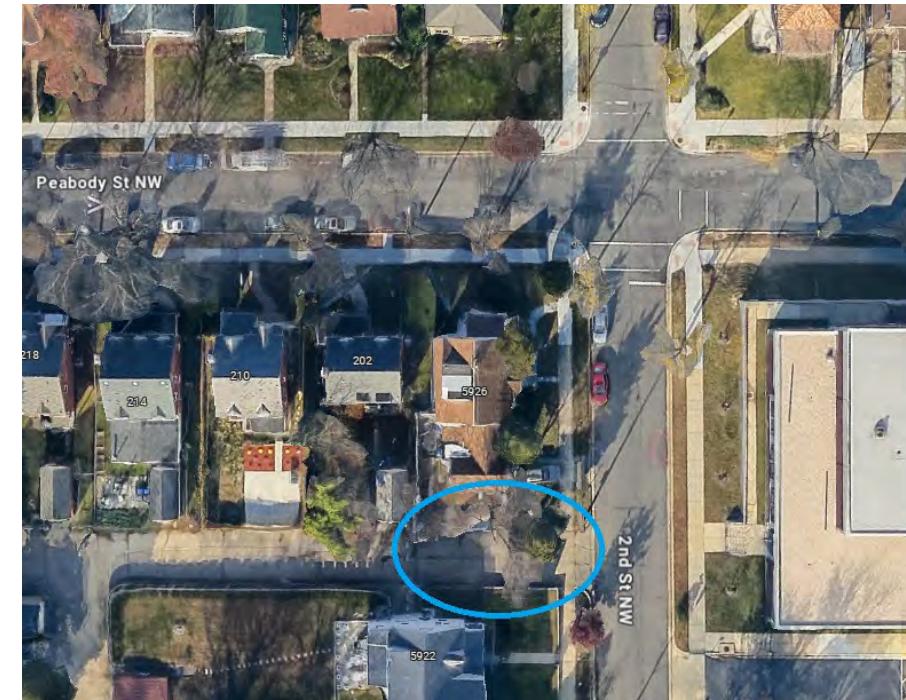


**Thursday, November 21<sup>st</sup> at 8:35 am**  
**200 block of Peabody St., NW**

## Use of Alley for CCPCS PUDO, denoted in Green



*Photo facing South*

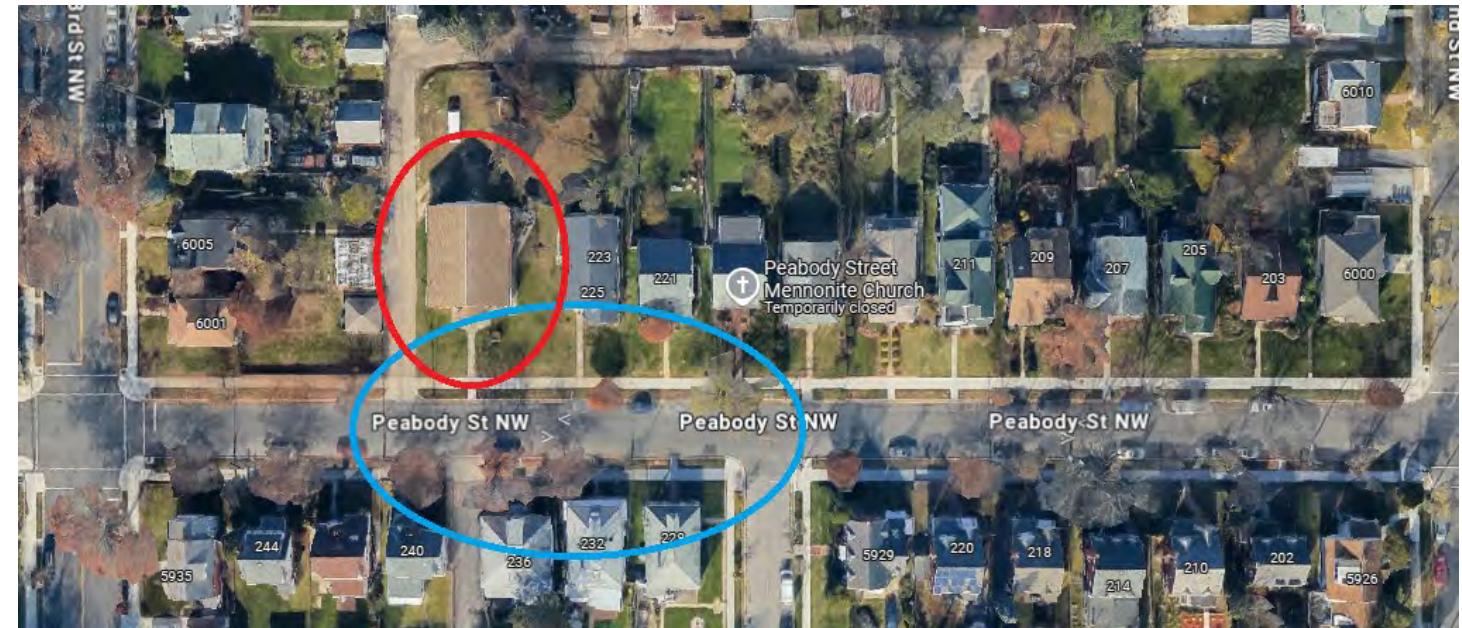


**Thursday, November 21<sup>st</sup> at 8:35 am**  
**Alley adjacent to 5926 2<sup>nd</sup> St., NW**

Congestion and two-way vehicular traffic in front of 245 Peabody St., NW



Photo facing East

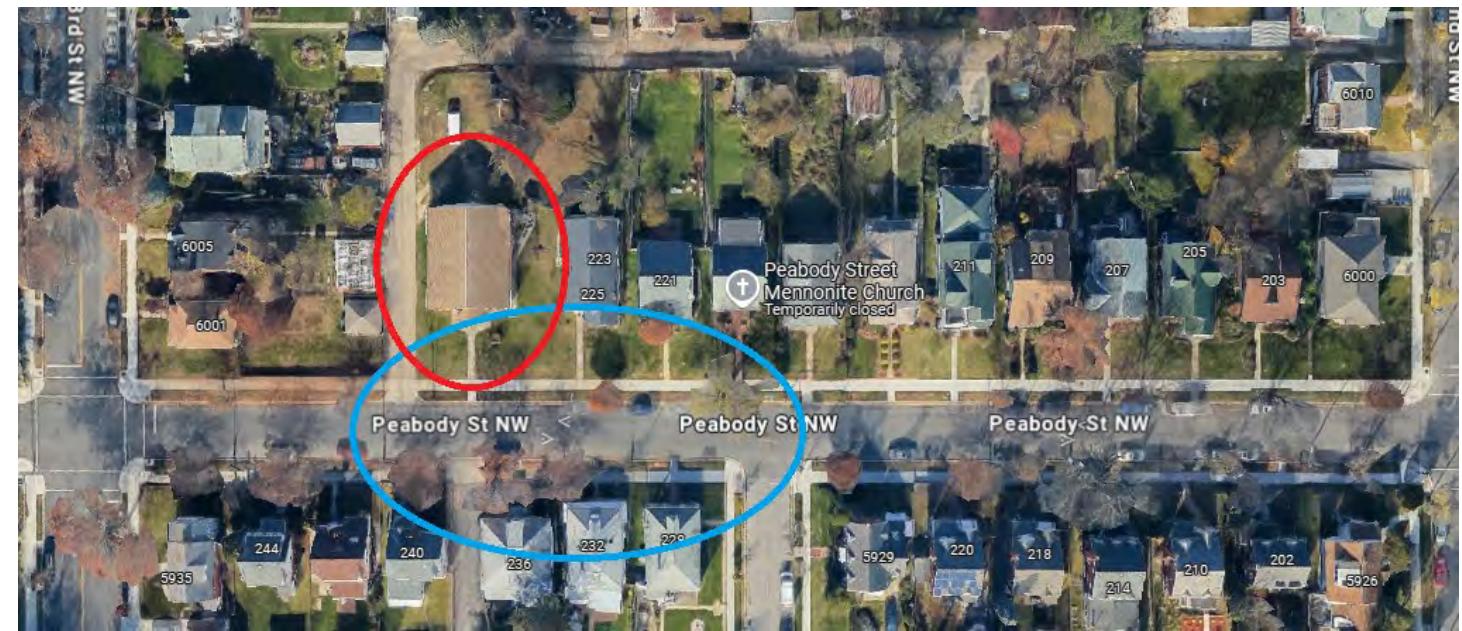


**Thursday, November 21<sup>st</sup> at 8:40 am**  
**245 Peabody St, NW**

Congestion and two-way vehicular traffic in front of 245 Peabody St., NW



Photo facing East

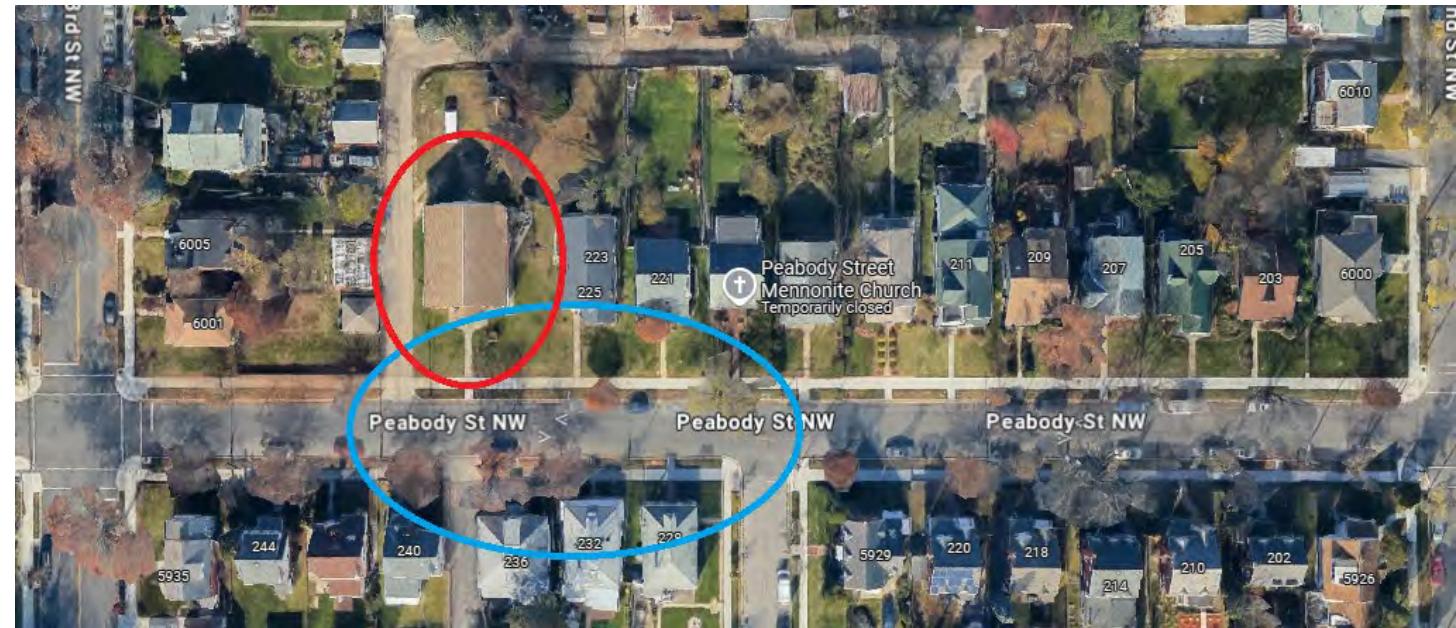


**Thursday, November 21<sup>st</sup> at 8:40 am**  
**245 Peabody St, NW**

Congestion and two-way vehicular traffic in front of 245 Peabody St., NW



Photo facing East



**Thursday, November 21<sup>st</sup> at 8:42 am**  
**245 Peabody St, NW**

## Use of Alley to avoid CCPCS traffic

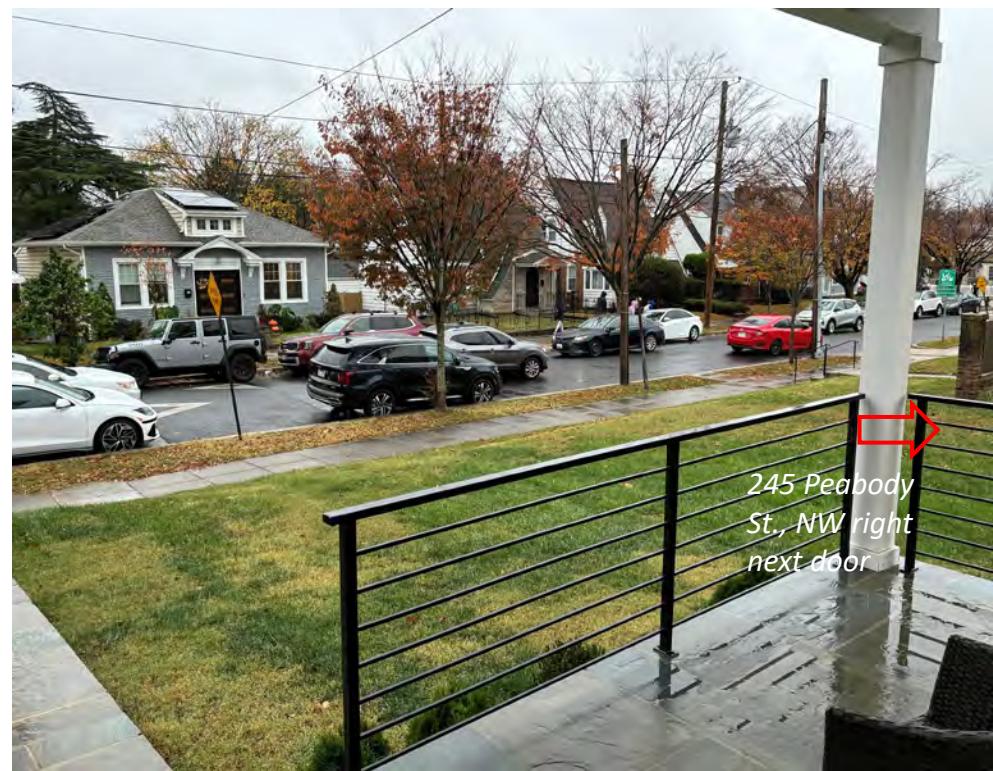
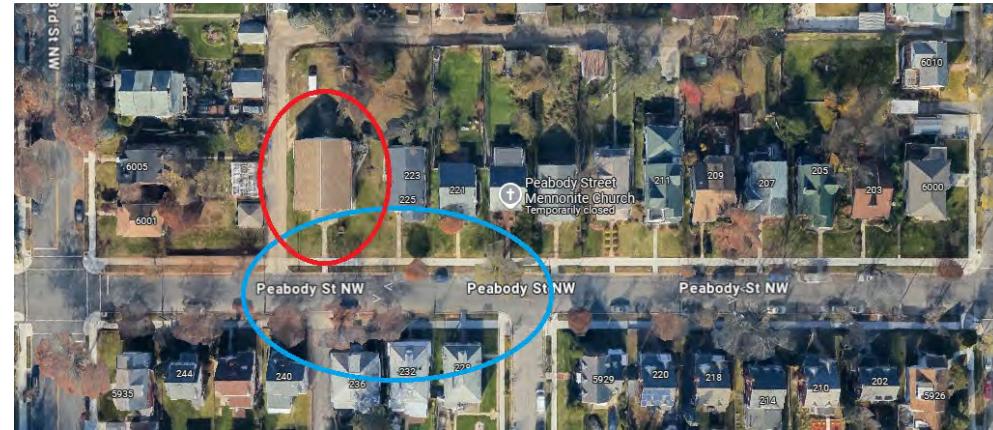


Photo facing East



**Thursday, November 21<sup>st</sup> at 8:50 am**  
Alley adjacent to 245 Peabody St, NW

*Afternoon*

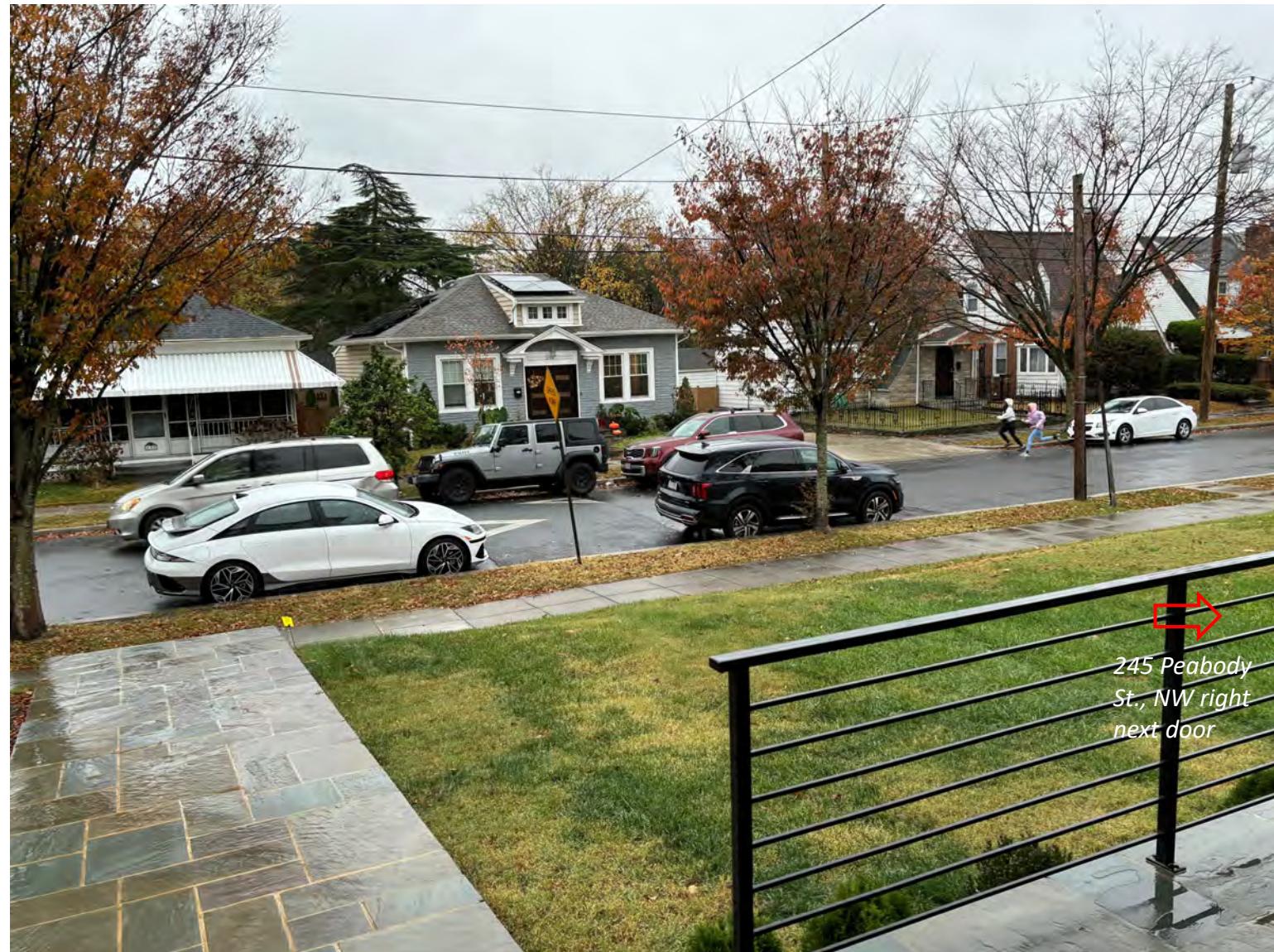
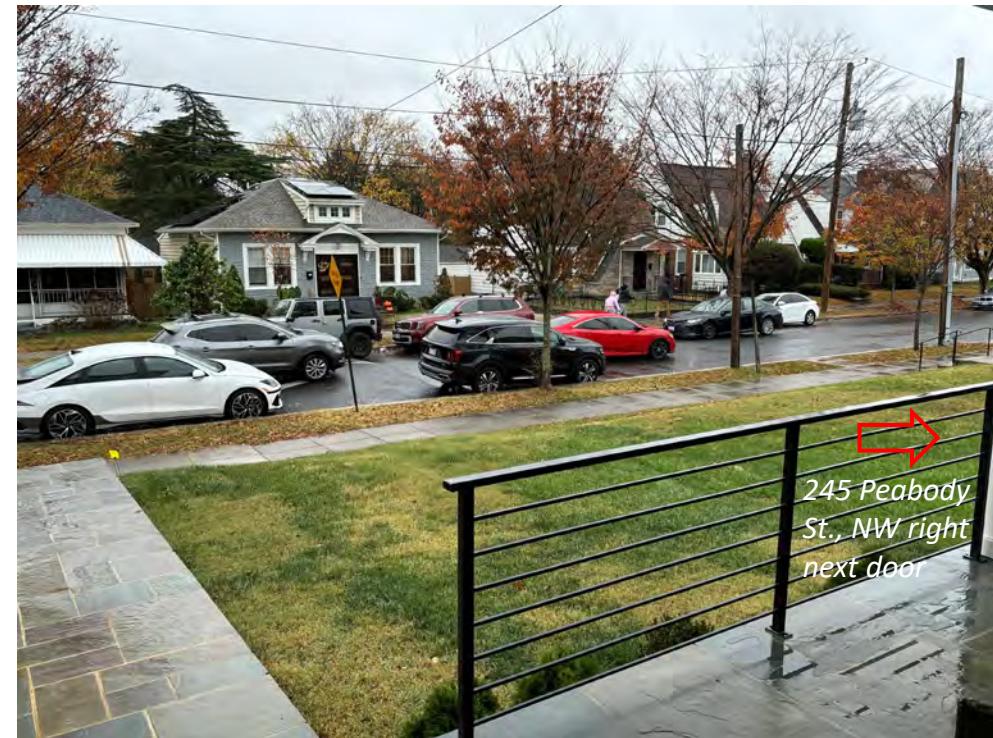
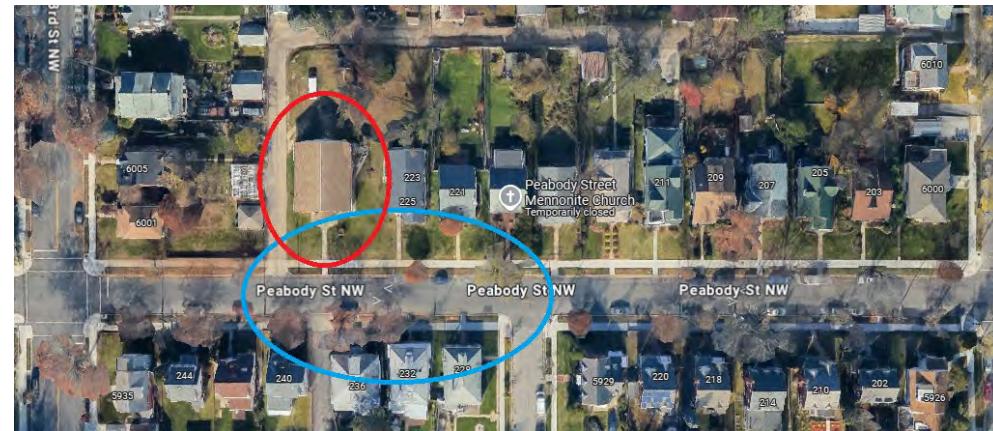


Photos facing West



**Friday, November 22<sup>nd</sup> at 3:37pm**  
During Capital City PCS Dismissal

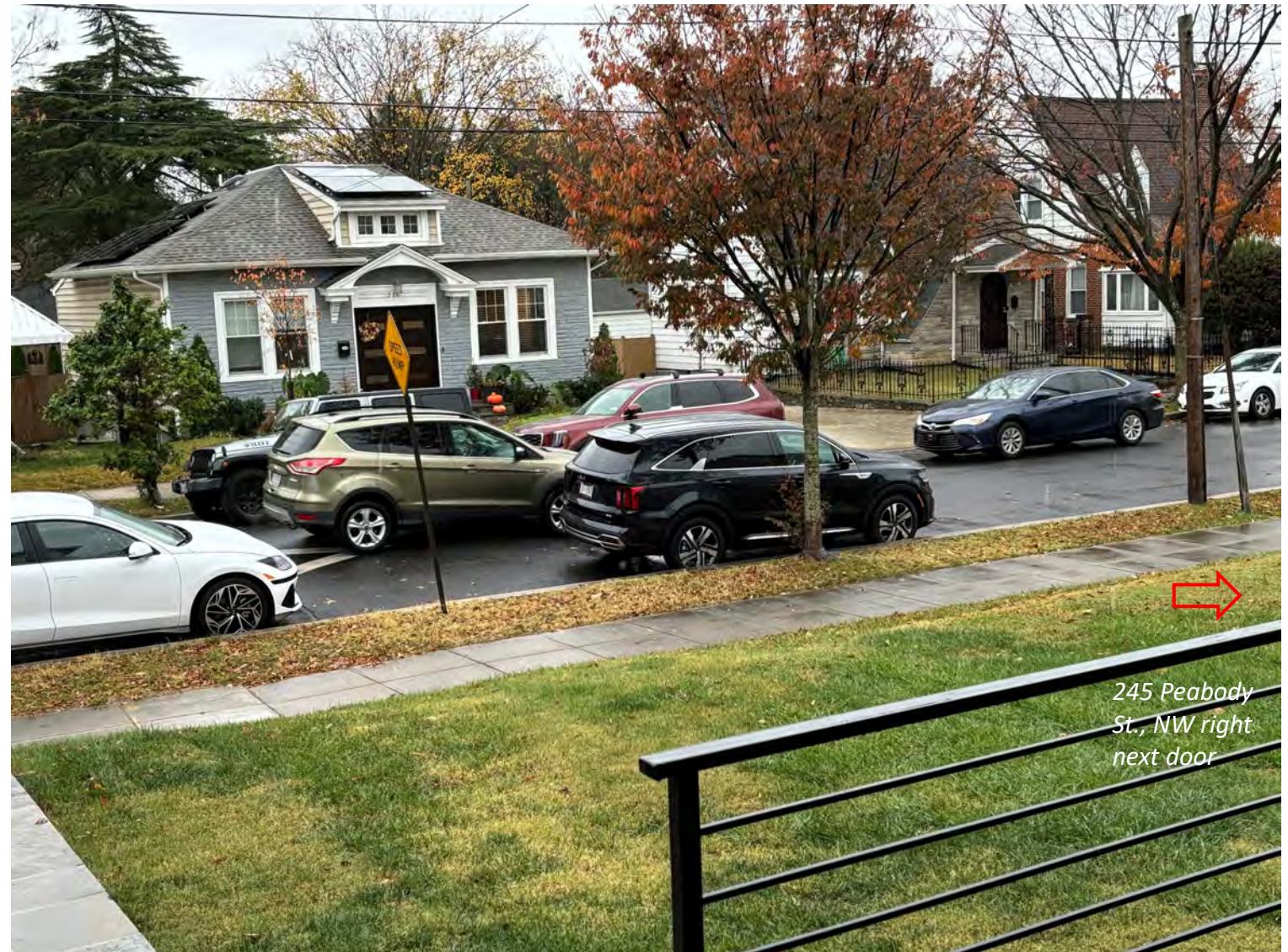
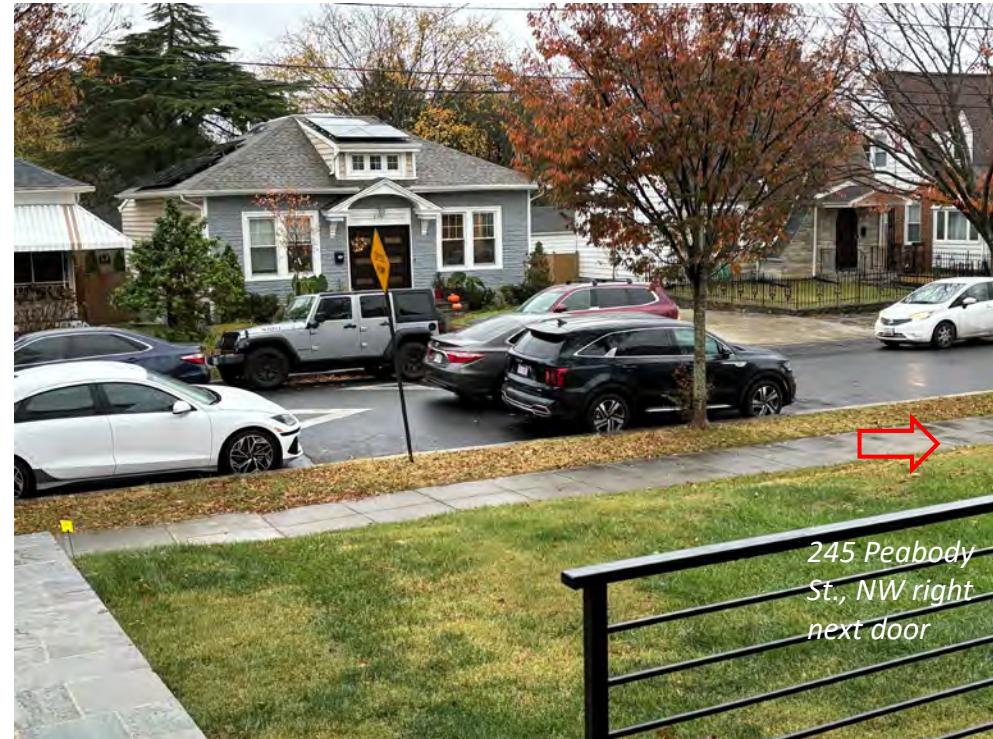
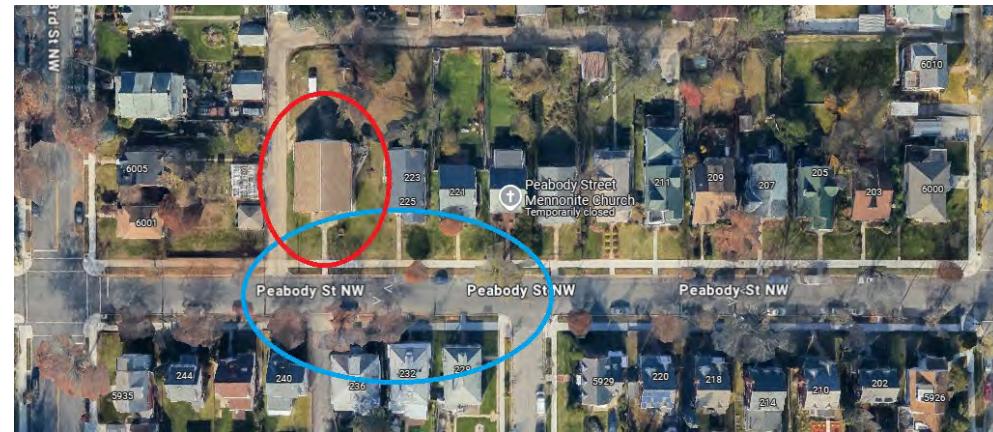
Part 1



Photos facing West

**Friday, November 22<sup>nd</sup> at 3:37pm**  
During Capital City PCS Dismissal

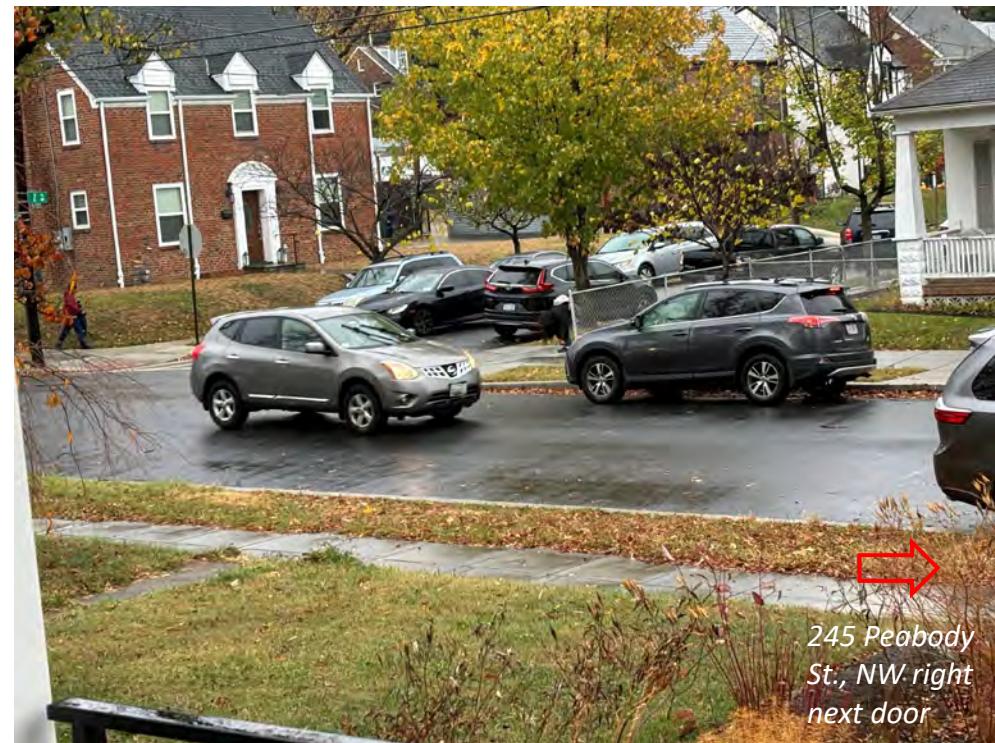
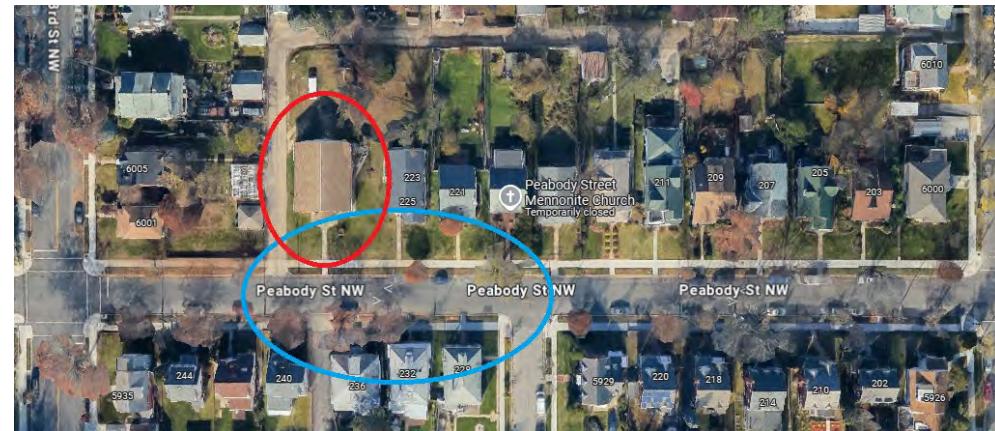
Part 2



Photos facing West

**Friday, November 22<sup>nd</sup> at 3:37pm**  
During Capital City PCS Dismissal

Part 3

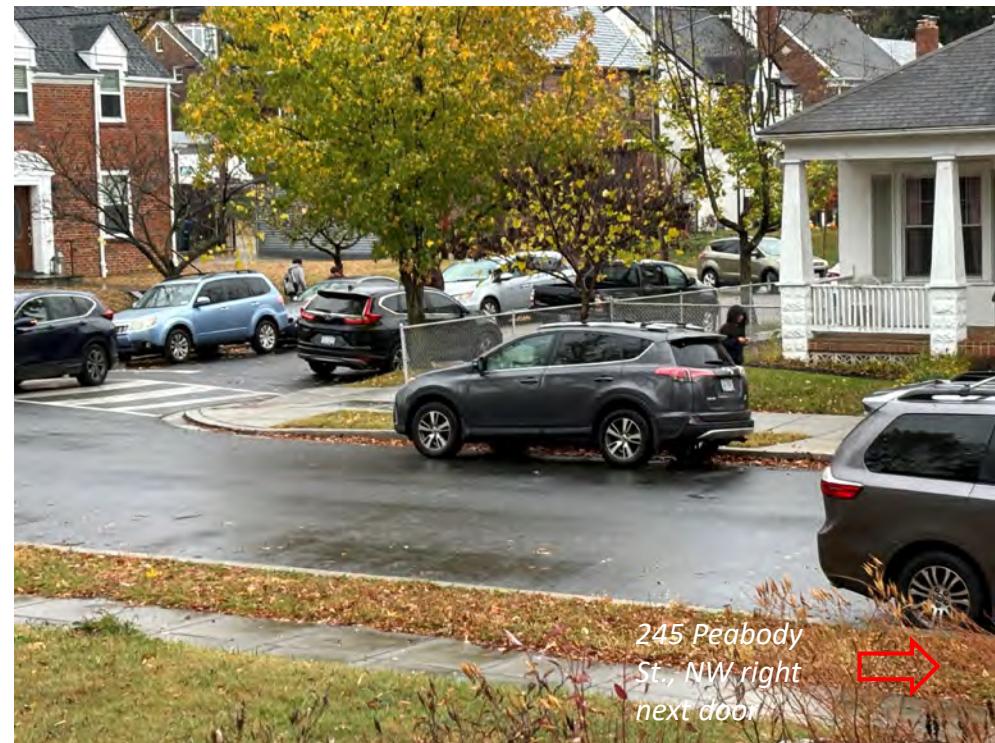
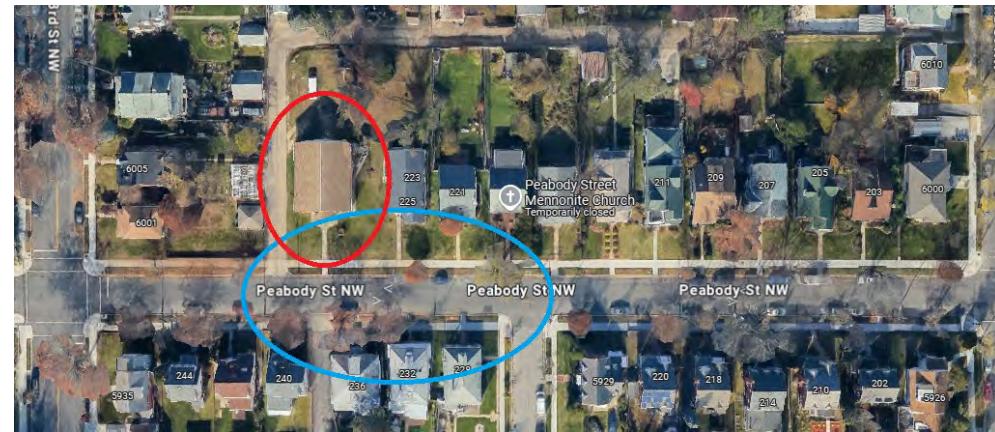


Photos facing East

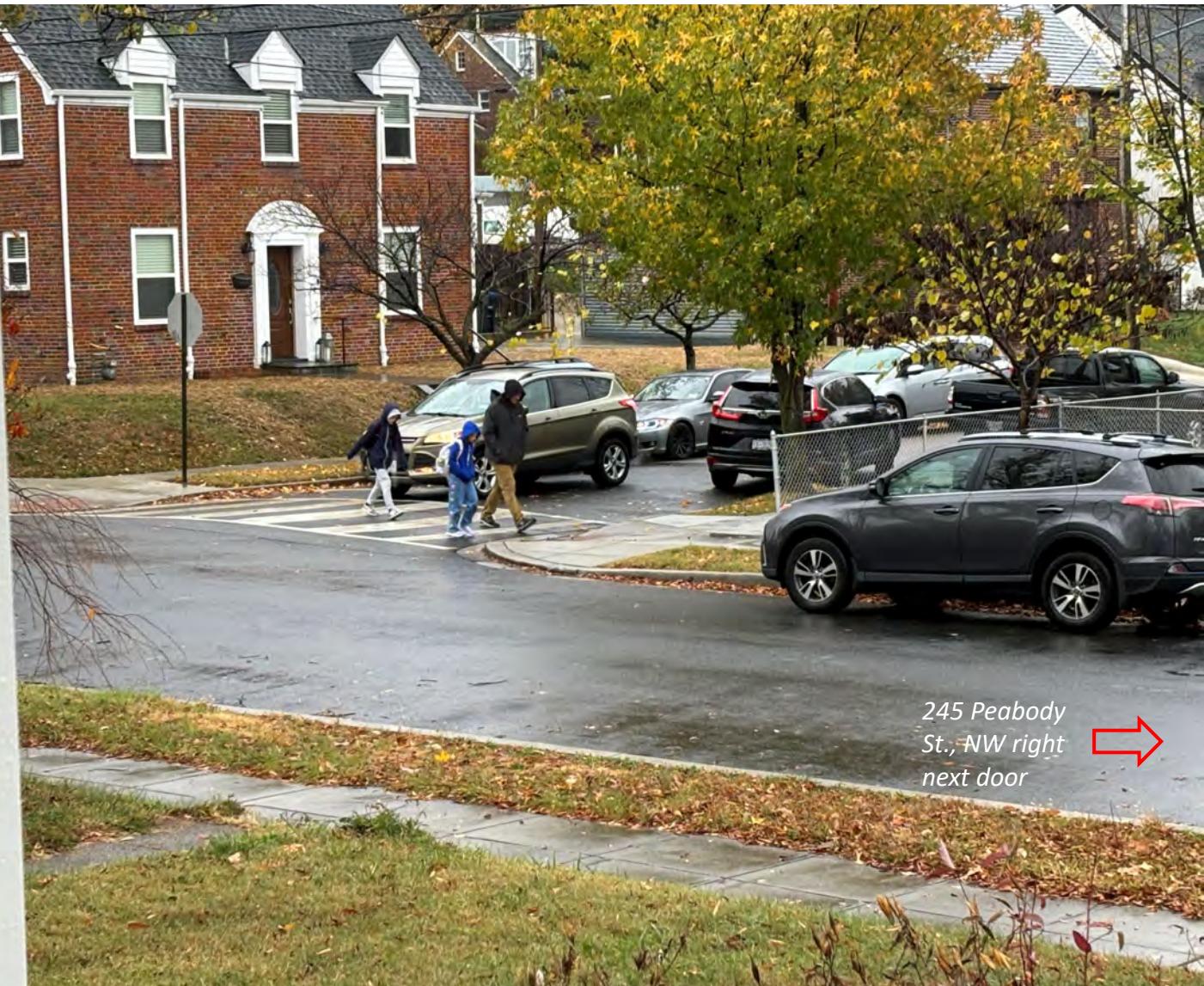
**Friday, November 22<sup>nd</sup> at 3:37pm**  
During Capital City PCS Dismissal

Part 4

245 Peabody  
St., NW right  
next door

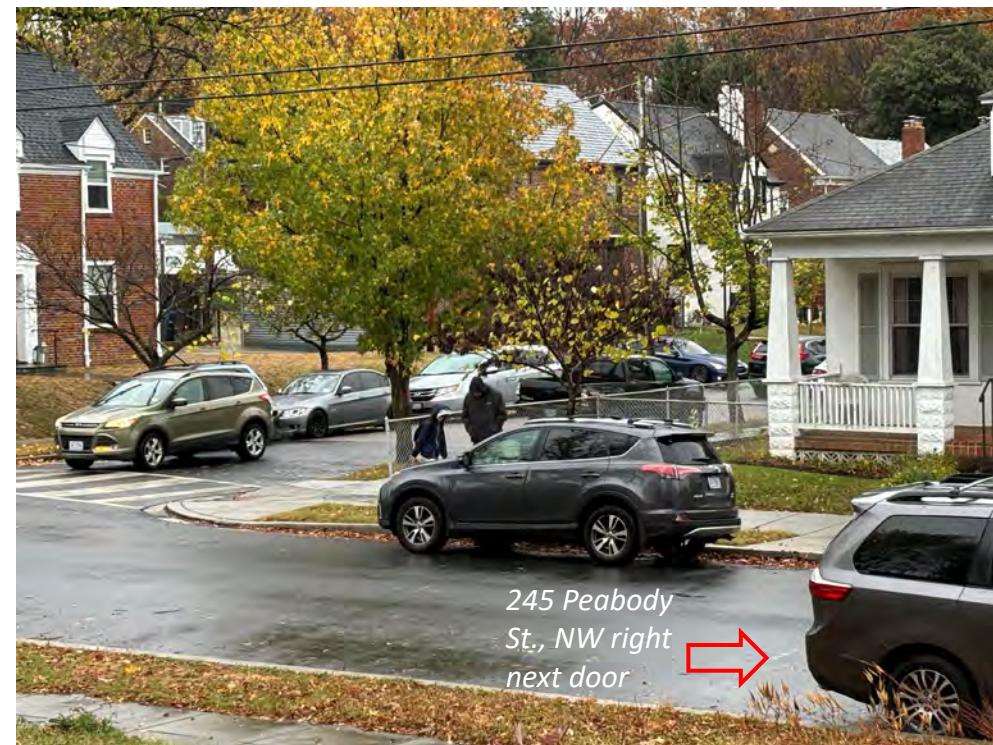
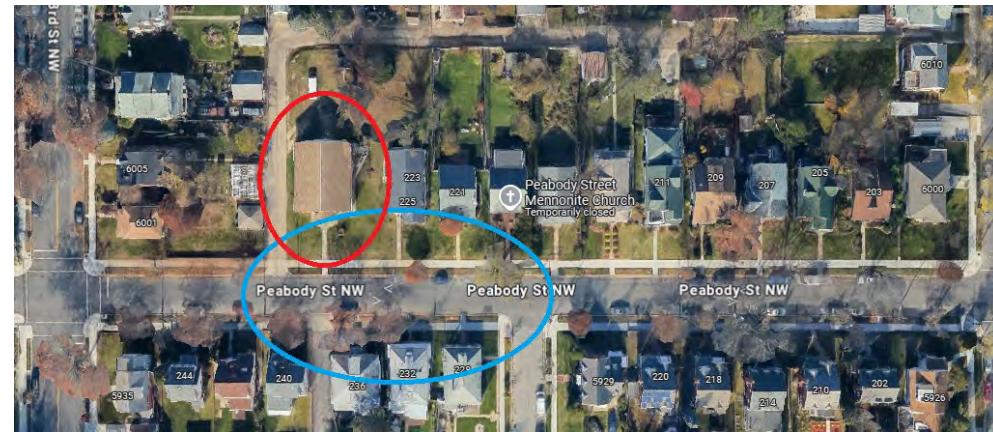


Photos facing East



**Friday, November 22<sup>nd</sup> at 3:37pm**  
During Capital City PCS Dismissal

Part 5



Photos facing East

**Friday, November 22<sup>nd</sup> at 3:37pm**  
During Capital City PCS Dismissal

Part 6

## Congestion on 200 block of Peabody St., NW



*Photo facing Southeast from 223 Peabody St., NW*



*Photo facing South from 223 Peabody St., NW*

**Friday, November 15<sup>th</sup> at 3:35pm**  
During Capital City PCS Dismissal

## Congestion on 200 block of Peabody St., NW



*Photo facing South from 223 Peabody St., NW directly adjacent to 245 Peabody St., NW*

**Friday, November 15<sup>th</sup> at 3:35pm**  
During Capital City PCS Dismissal

## Congestion on 200 block of Peabody St., NW



*Photo facing Southeast from 223 Peabody St., NW*



*Photo facing South from 223 Peabody St., NW*

**Thursday, November 21<sup>st</sup> at 3:32pm**  
During Capital City PCS Dismissal

## Congestion on 200 block of Peabody St., NW



*Photo facing South from 223 Peabody St., NW directly adjacent to 245 Peabody St., NW*

**Thursday, November 21<sup>st</sup> at 3:32pm**  
During Capital City PCS Dismissal

*Evening*

## Congestion in front of 245 Peabody St., NW

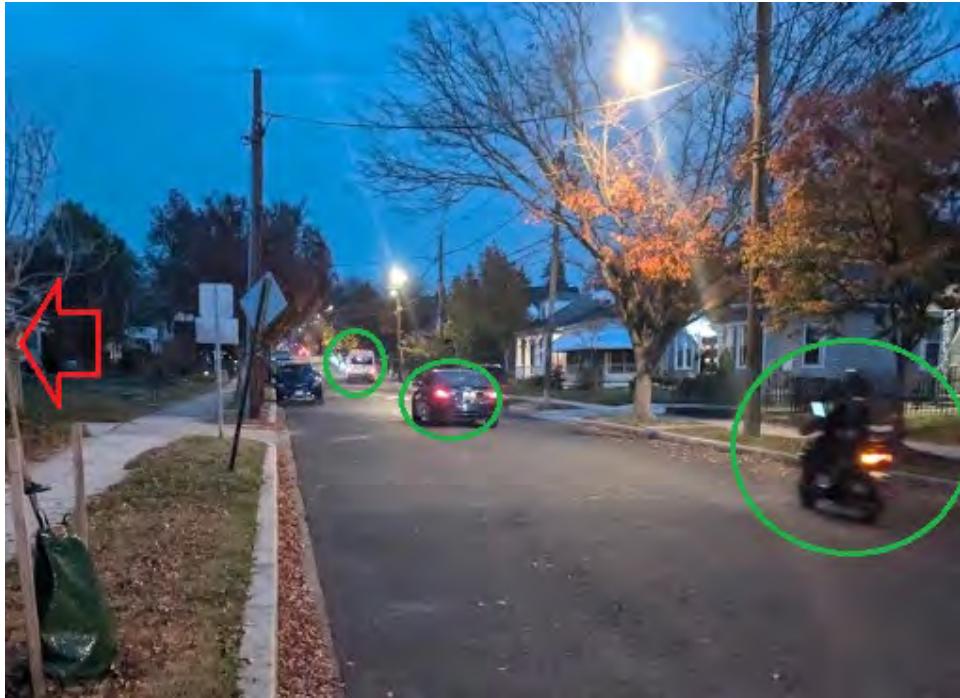
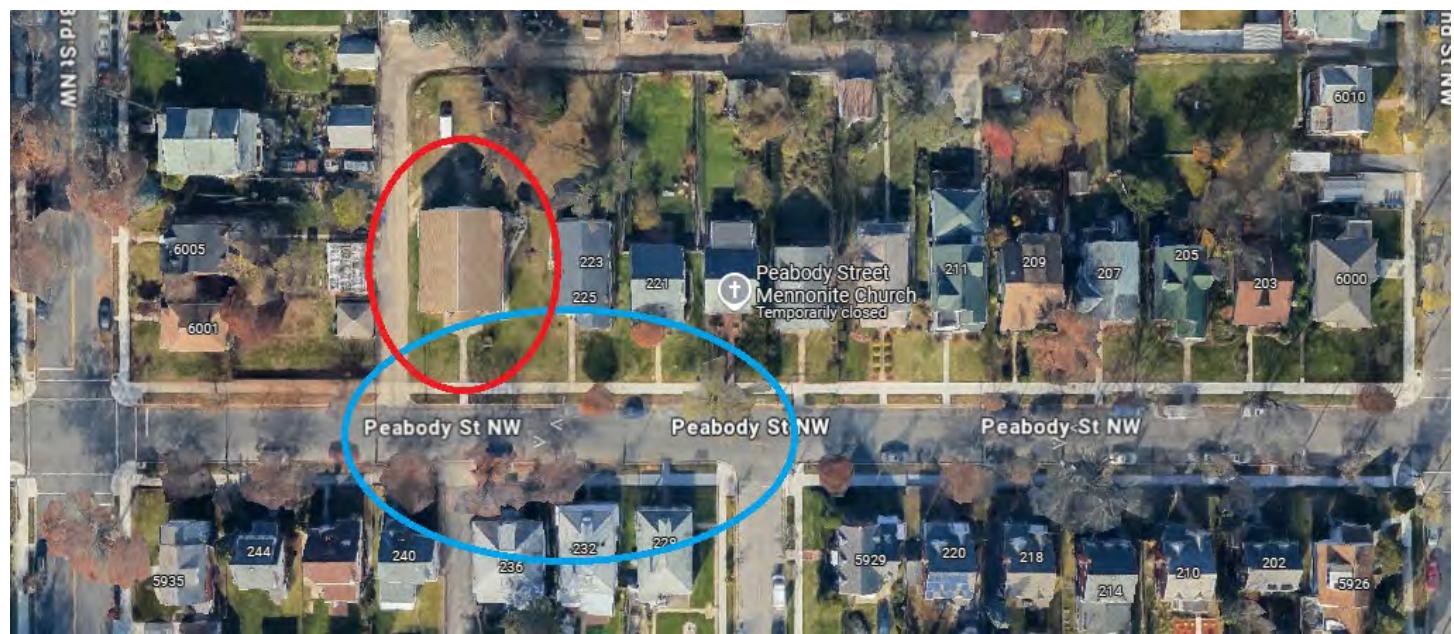


Photo facing East



**Thursday, November 21<sup>st</sup> at 5:15 pm**  
**245 Peabody St, NW**