

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 bely 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

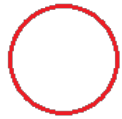
245 Peabody St., NW

Traffic and parking observations around the areas of:

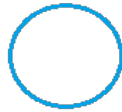
- 100 block of Peabody St., NW
- 200 block of Peabody St., NW
- 6000 block of 2nd St., NW
- 5900 block of 2nd St., NW
- Alleys adjacent to these streets

Overview

Color Legend



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

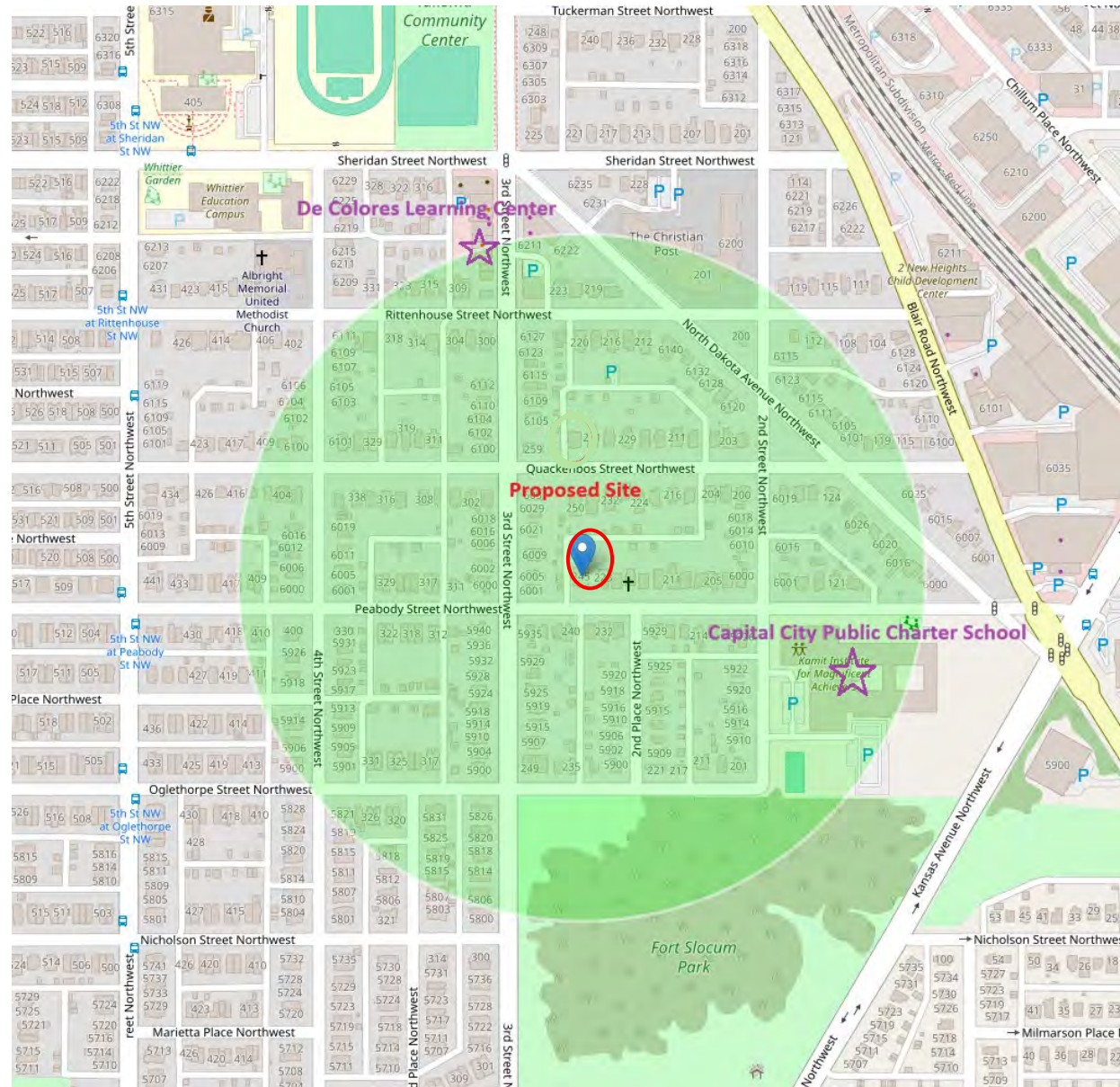


Denotes general area observed

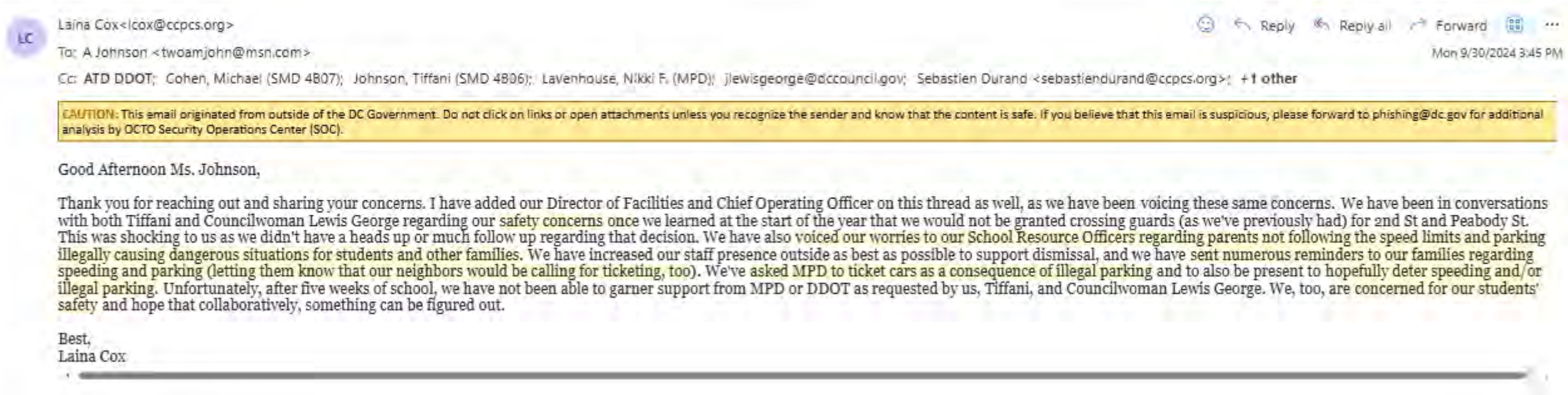


Highlights observed traffic issue

1000 Foot Radius of 245 Peabody St., NW



Email from CCPCS Principal detailing traffic and safety concerns

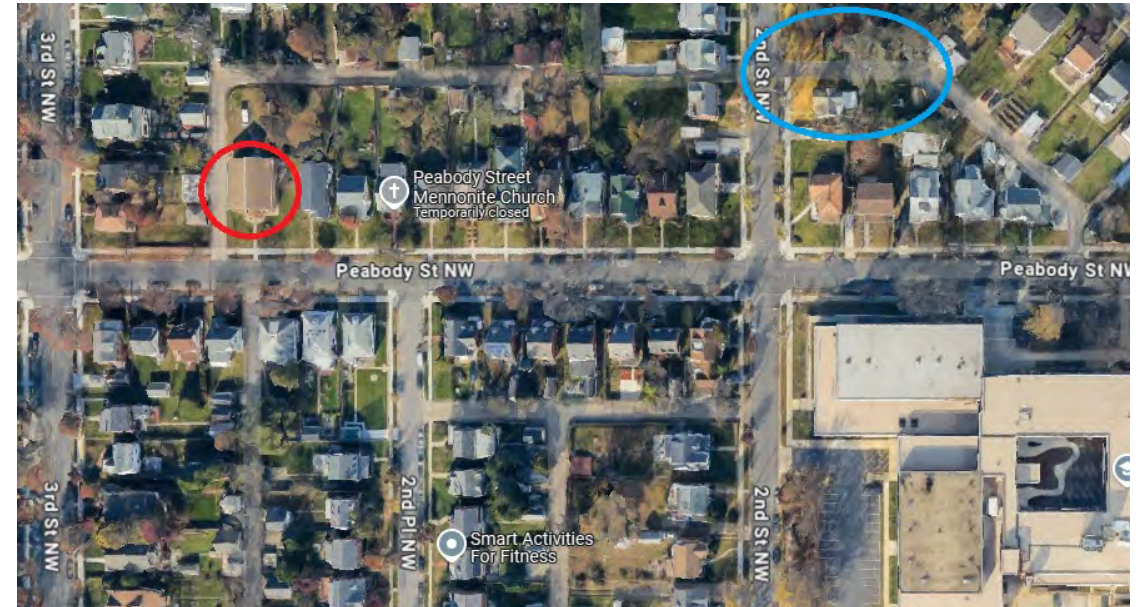


E-mail dated September 30, 2024

Morning



Photo facing East



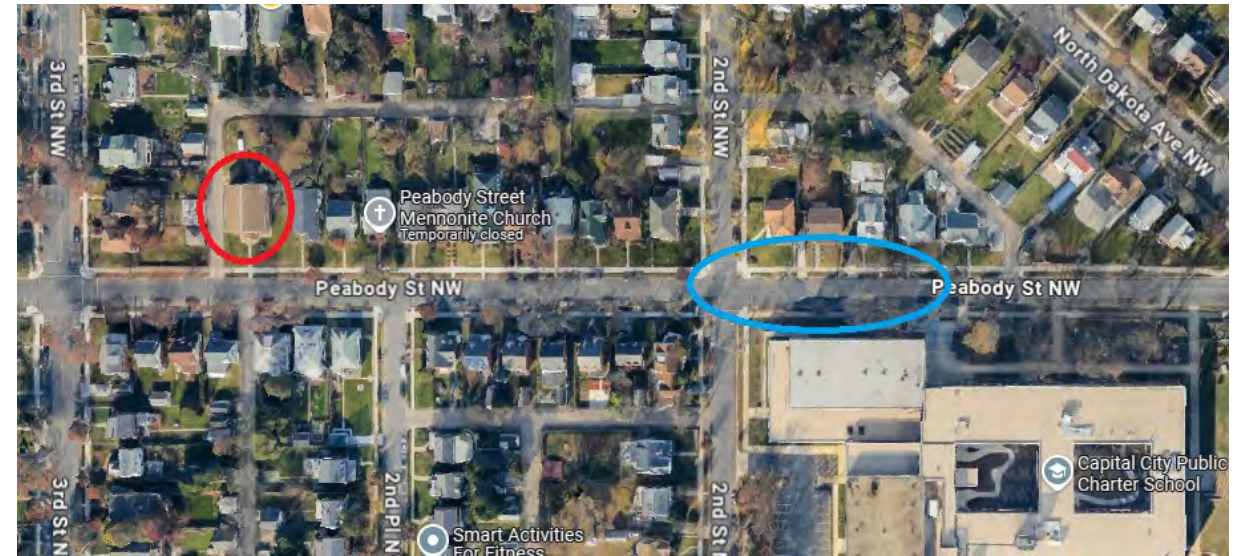
Monday, November 18th at 8:16am

Alley between 2nd St., NW; Peabody St., NW; and North Dakota Ave., NW

Significant congestion, parking issues, no DDOT TOC available



Photo facing East



Monday, November 18th 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 19th 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



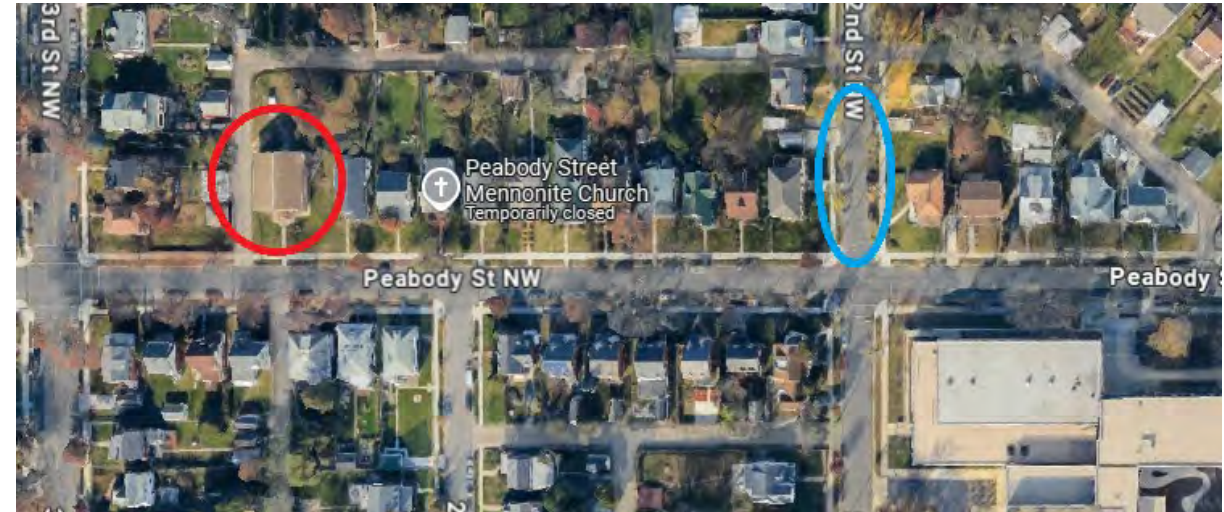
Photo facing South on 100 block of Peabody St., NW

Tuesday, November 19th at 8:19am
During Capital City PCS Arrival

Cars blocking Peabody St., NW Private Parking Access



Photo facing South



Monday, November 18th at 8:16am
6000 block of 2nd St., NW

General Congestion on 2nd St., NW



Photo facing South



Monday, November 18th at 8:16am
5900 block of 2nd St., NW

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



Photo facing West



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

Congestion on 200 block of Peabody St., NW



Photo facing West



Thursday, November 21st at 8:35 am
200 block of Peabody St., NW

Use of Alley for CCPCS PUDO, denoted in Green



Photo facing South

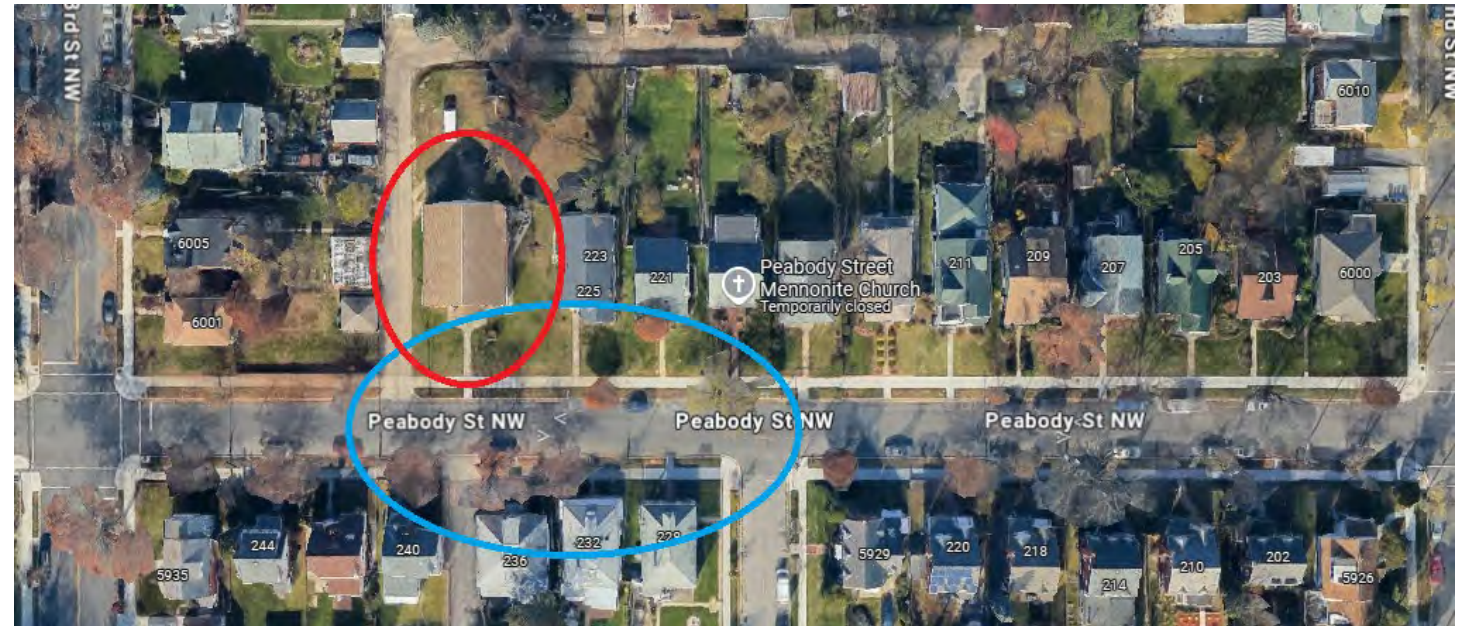


Thursday, November 21st at 8:35 am
Alley adjacent to 5926 2nd St., NW

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



Photo facing East

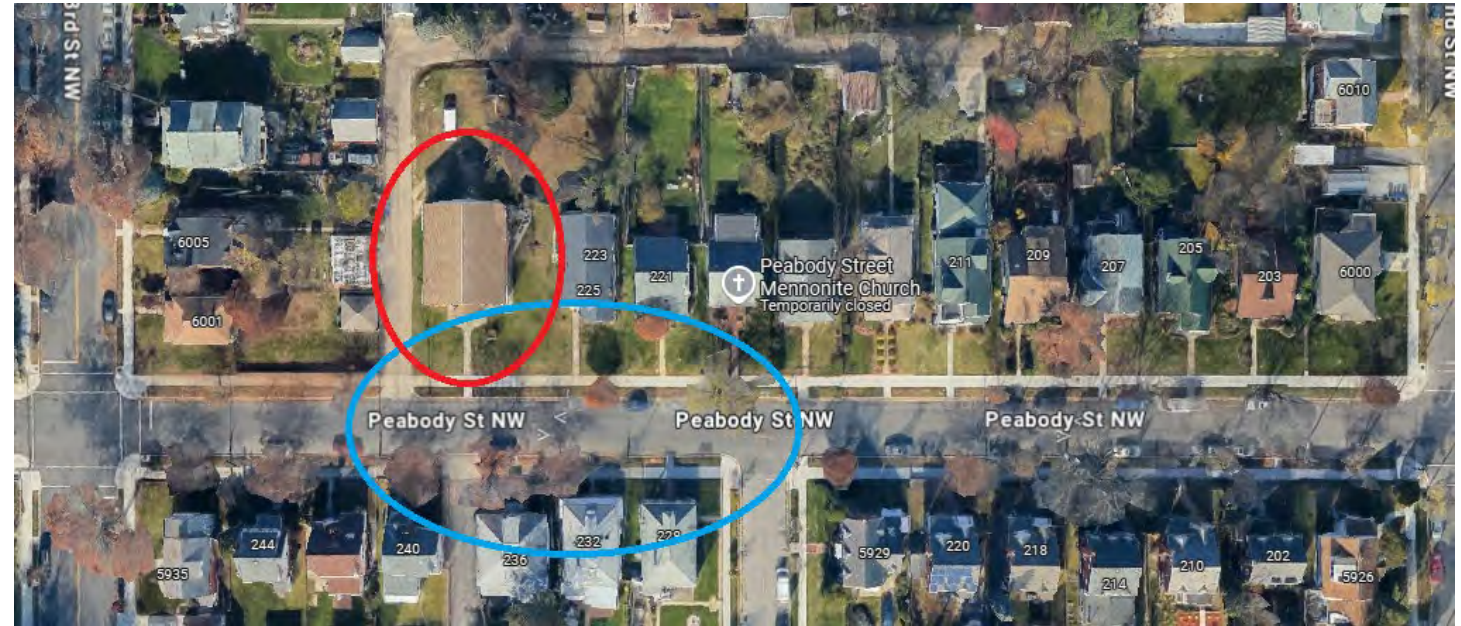


Thursday, November 21st at 8:40 am
245 Peabody St, NW

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



Photo facing East

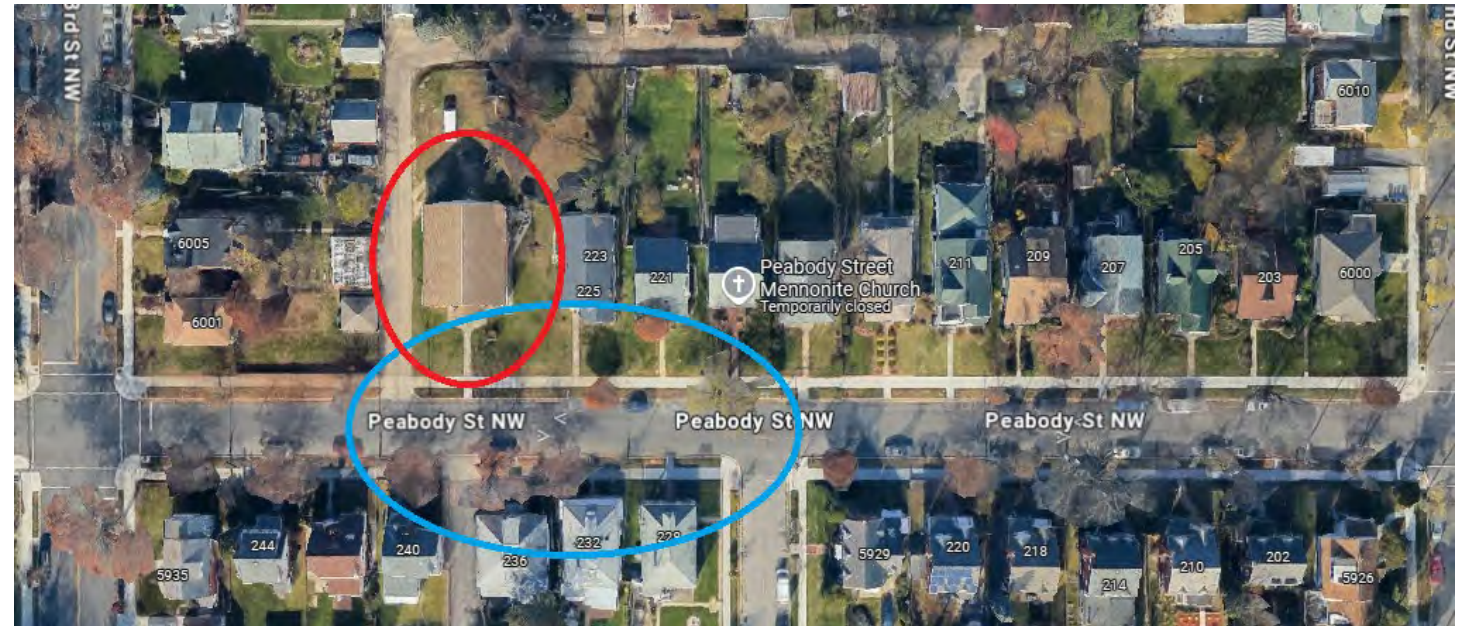


Thursday, November 21st at 8:40 am
245 Peabody St, NW

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



Photo facing East



Thursday, November 21st at 8:42 am
245 Peabody St, NW

Use of Alley to avoid CCPCS traffic

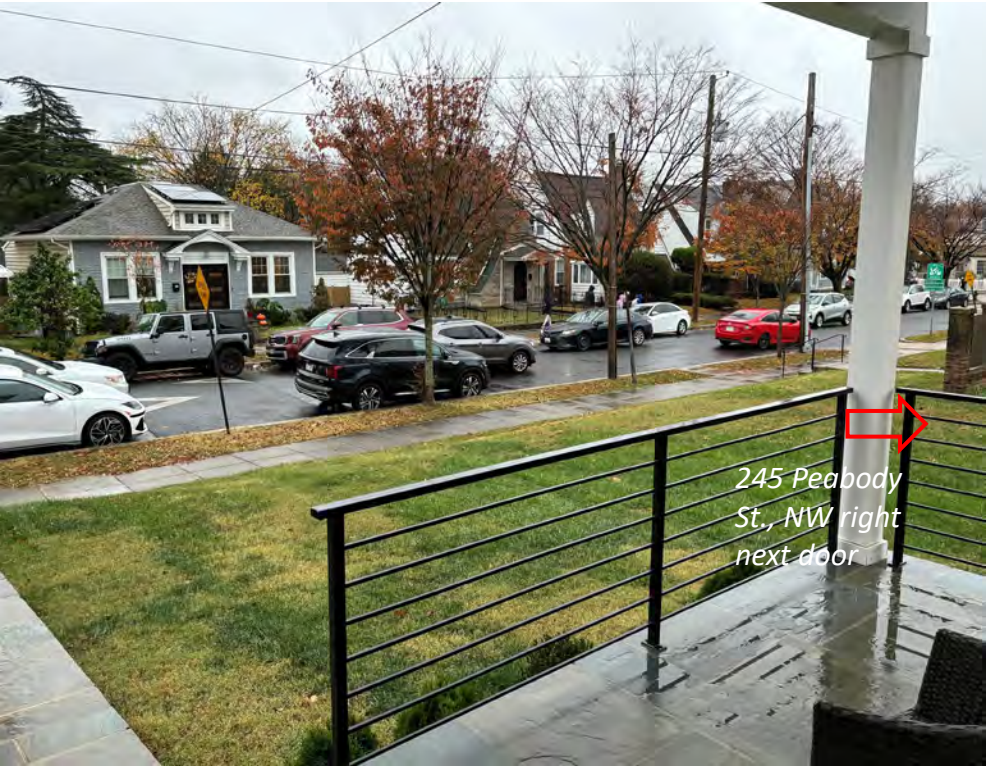
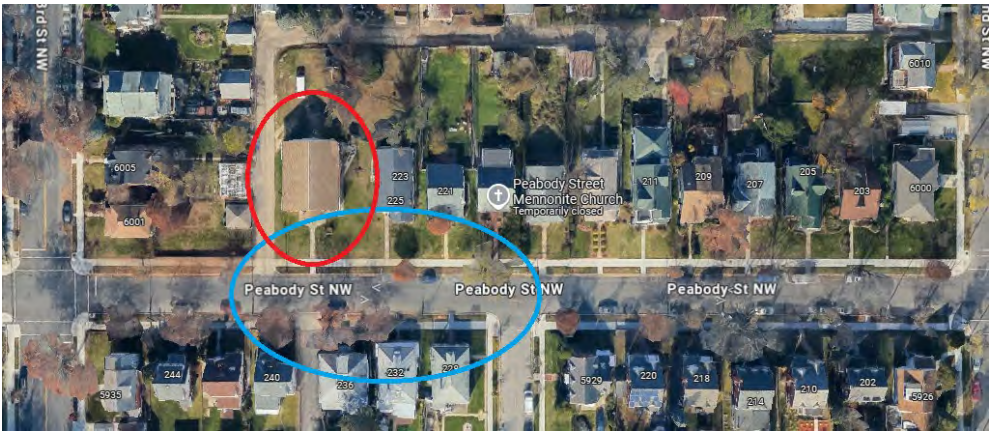


Photo facing East



Thursday, November 21st at 8:50 am
Alley adjacent to 245 Peabody St, NW

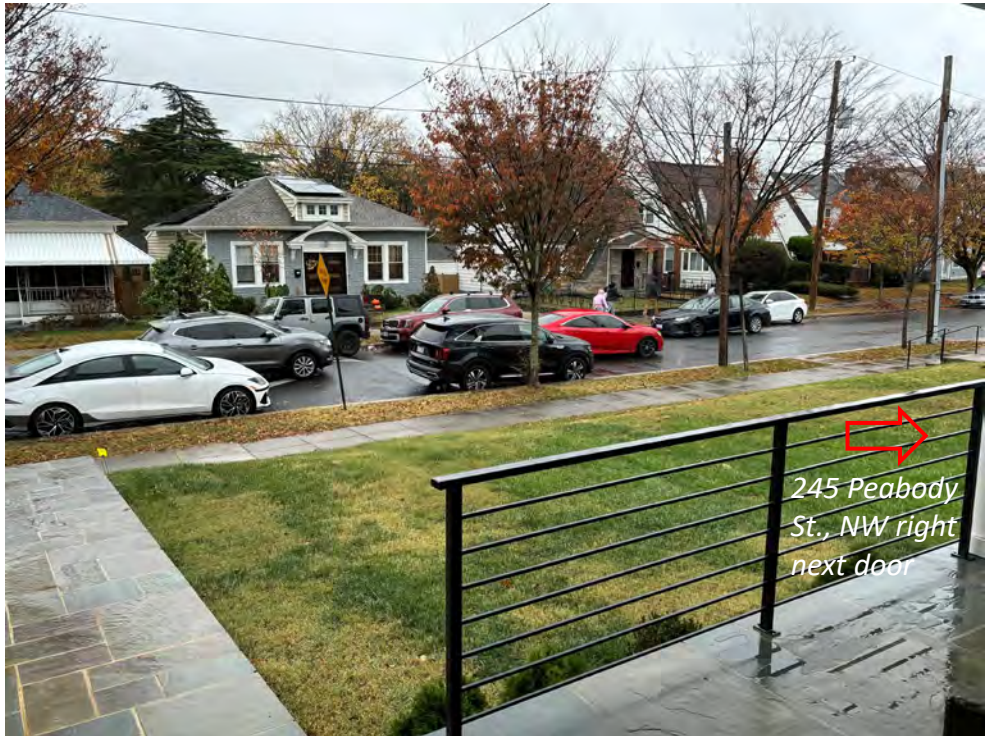
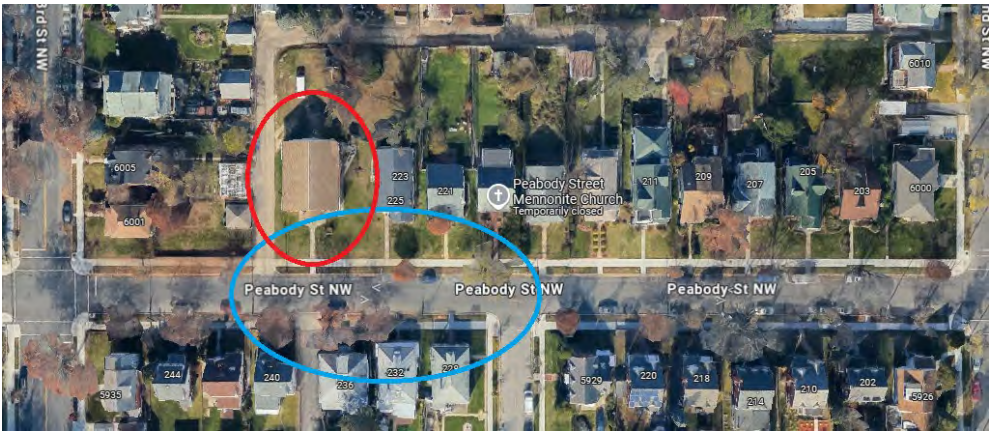
Afternoon



Photos facing West



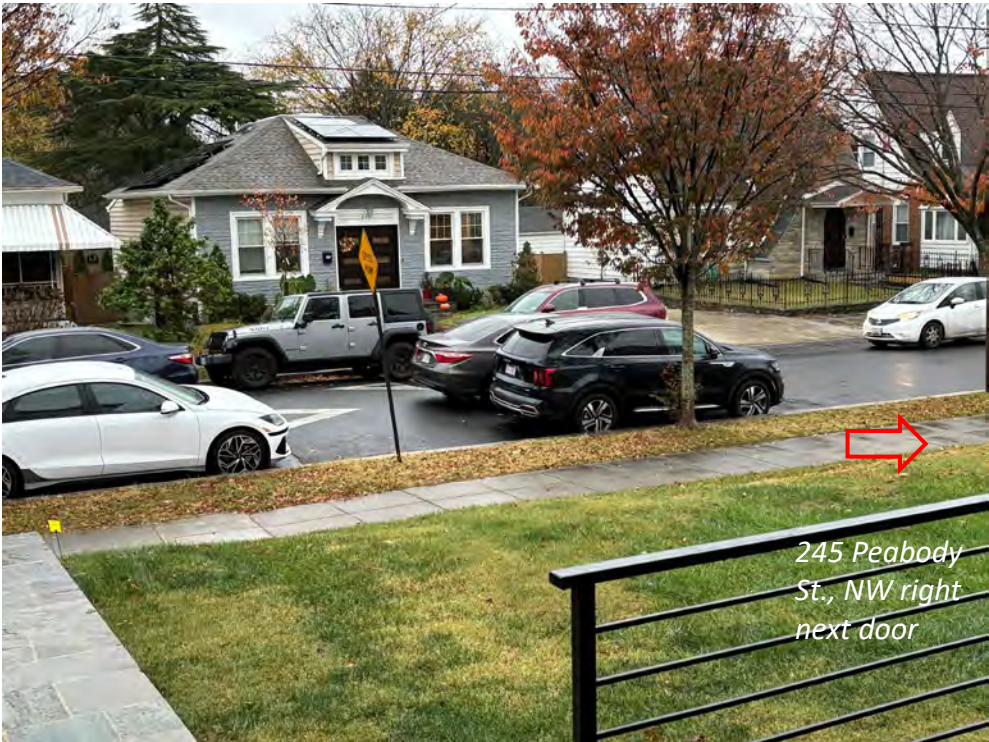
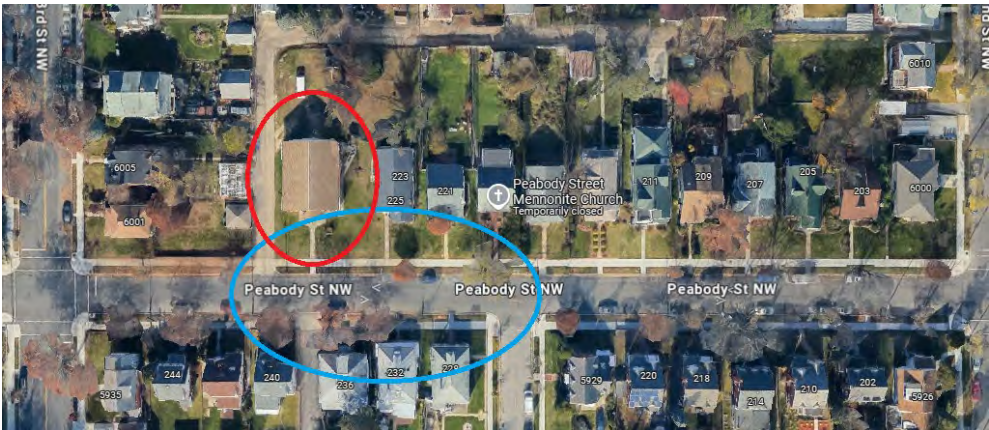
Friday, November 22nd at 3:37pm
During Capital City PCS Dismissal



Photos facing West



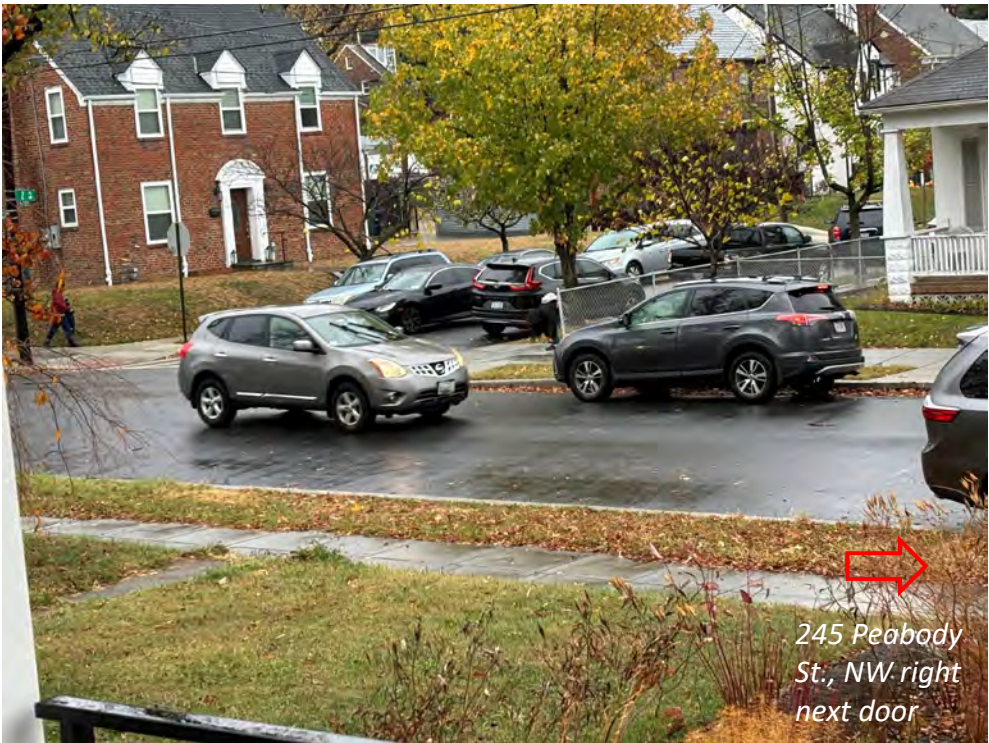
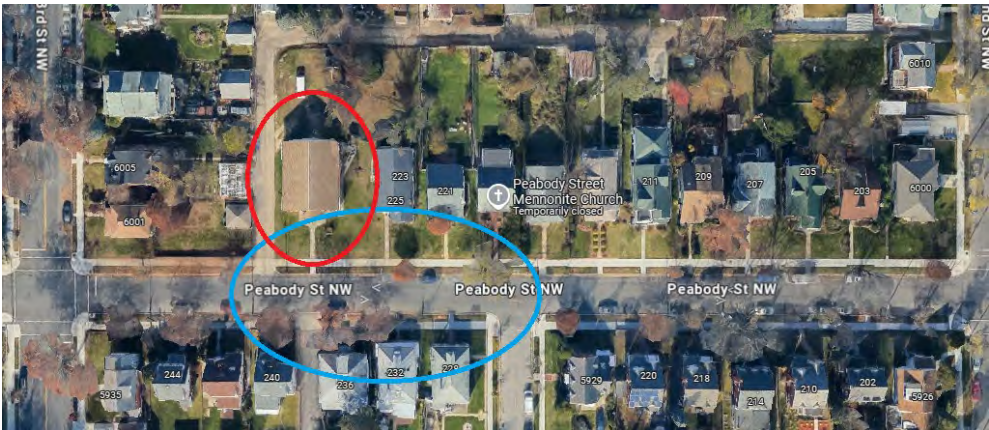
Friday, November 22nd at 3:37pm
During Capital City PCS Dismissal



Photos facing West



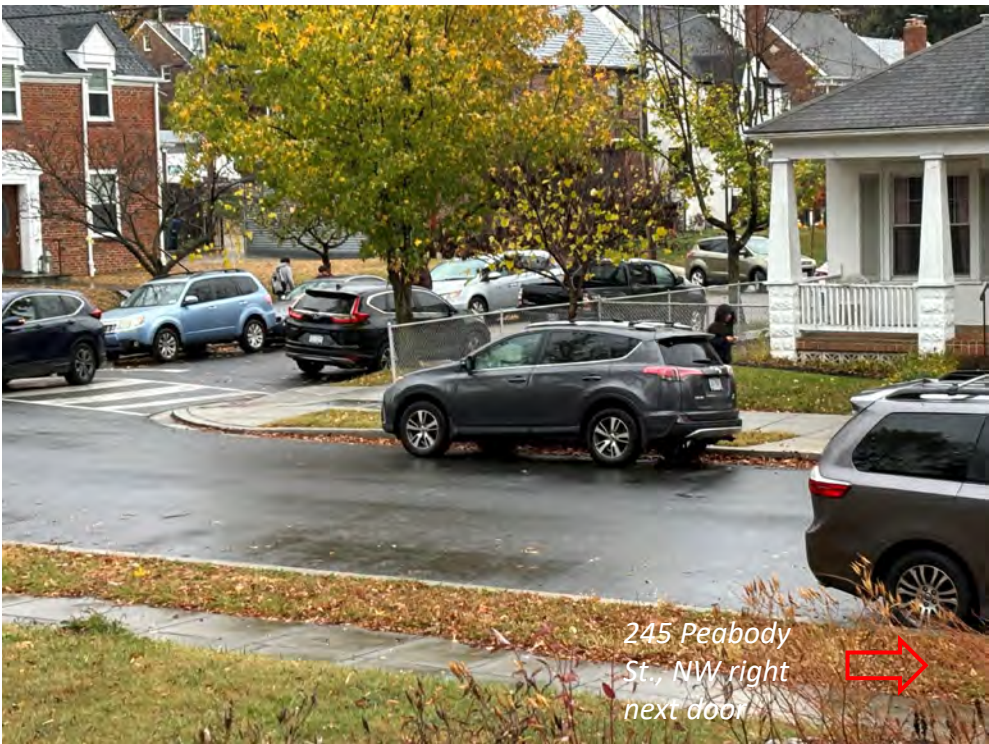
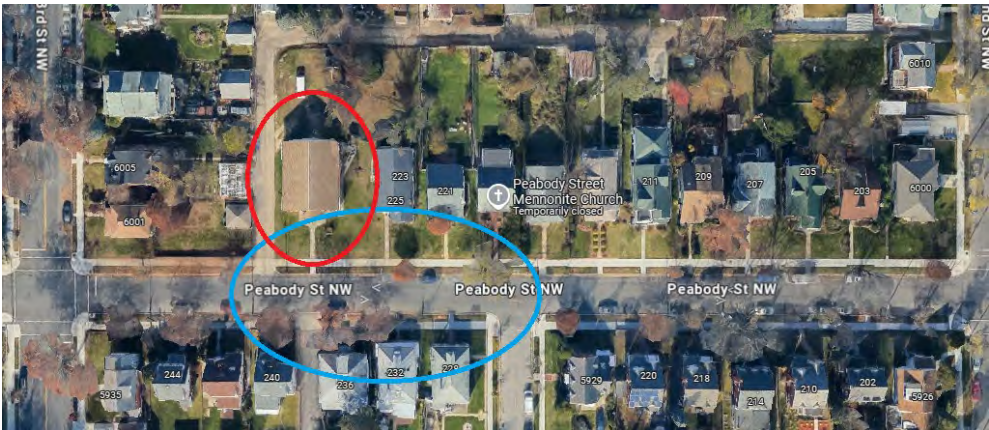
Friday, November 22nd at 3:37pm
During Capital City PCS Dismissal



Photos facing East



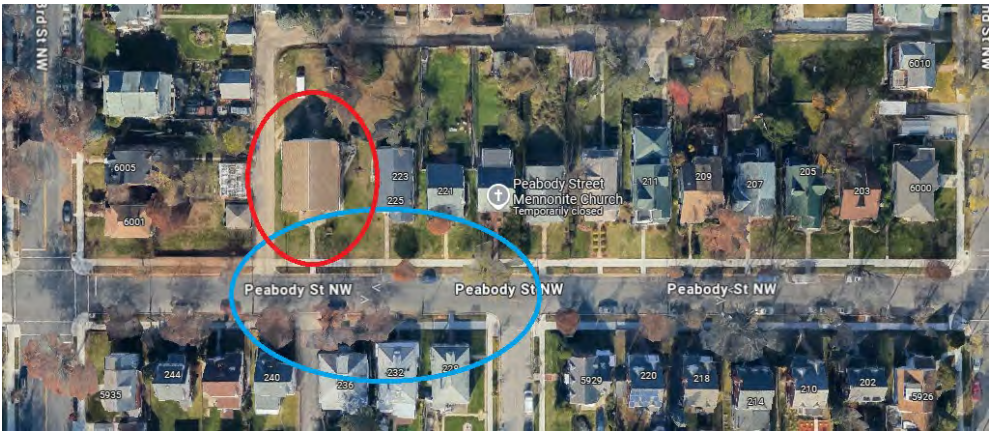
Friday, November 22nd at 3:37pm
During Capital City PCS Dismissal



Photos facing East



Friday, November 22nd at 3:37pm
During Capital City PCS Dismissal



Photos facing East



Friday, November 22nd at 3:37pm
During Capital City PCS Dismissal

Congestion on 200 block of Peabody St., NW



Photo facing Southeast from 223 Peabody St., NW



*245 Peabody St., NW right next
door*

Photo facing South from 223 Peabody St., NW

Friday, November 15th 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 15th 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 21st 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 21st at 3:32pm
During Capital City PCS Dismissal

Evening

Congestion in front of 245 Peabody St., NW

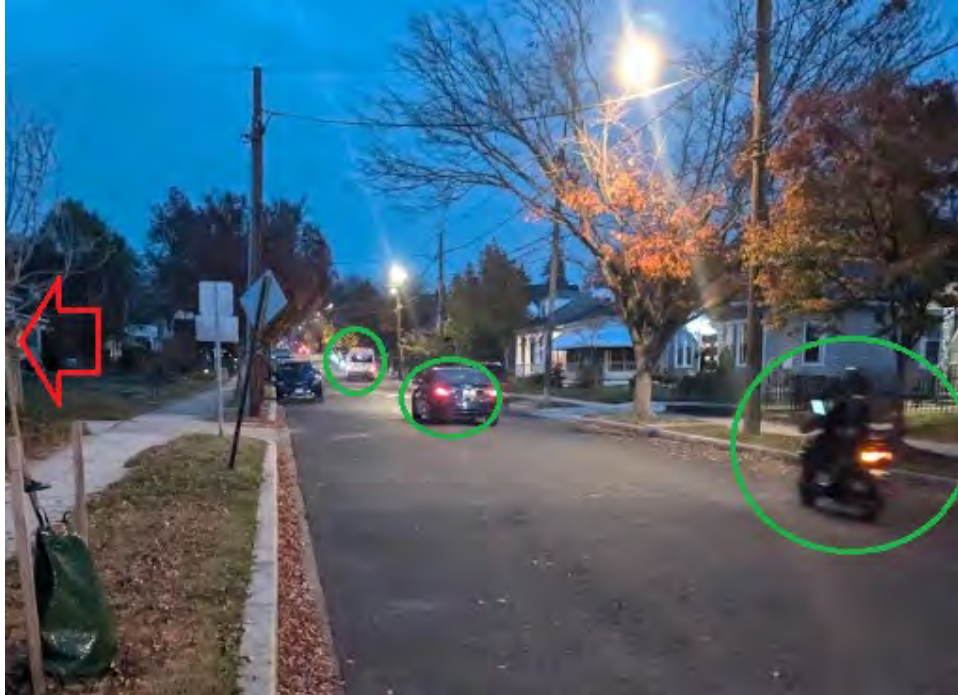
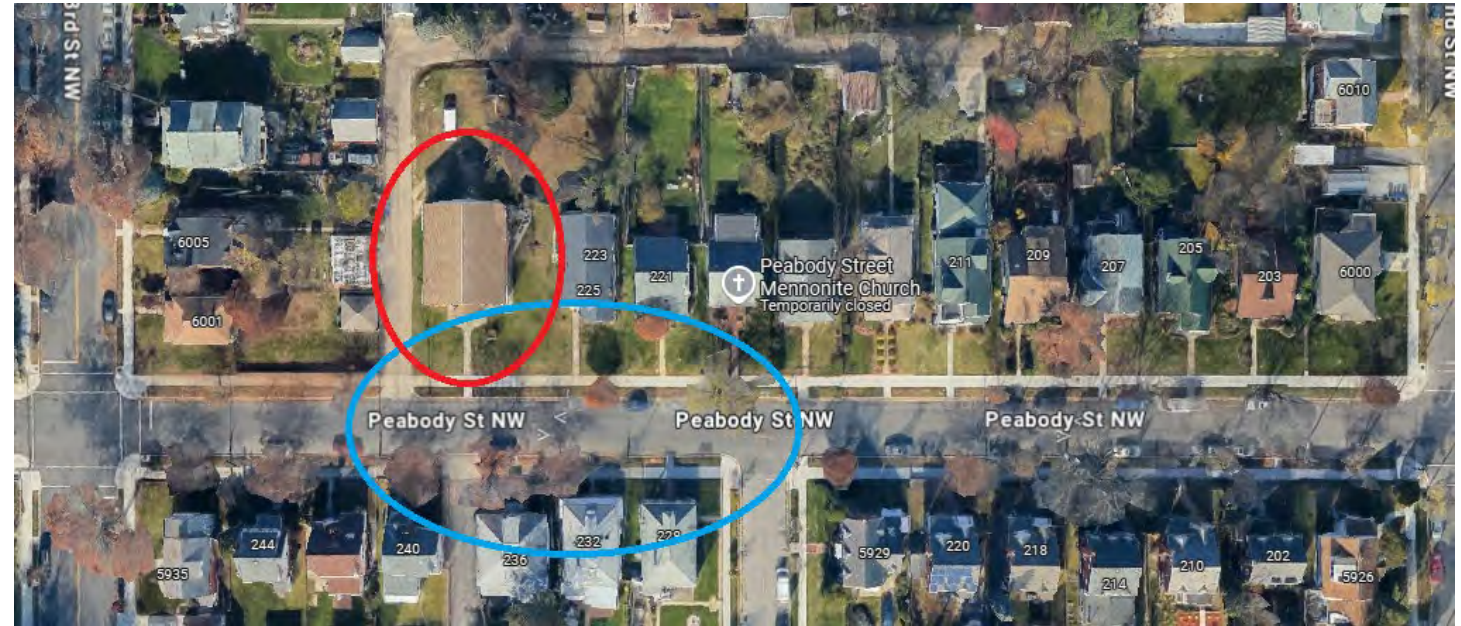


Photo facing East



Thursday, November 21st at 5:15 pm
245 Peabody St, NW