December 19, 2003

Mr. Geoffery Griffis
Chairperson
Board of Zoning Adjustment
441 Fourth Street NW, Room 201
Washington DC, 20001

Re: Applicant's December 17, 2003 "Motion To Strike Certain Materials"
BZA Application 16970
National Child Research Center
3209 Highland Place NW, Square 2072, Lot 30

Dear Mr. Griffis,

This letter is a supplement to the "Answer in Opposition To Motion To Strike Certain Materials From the Record" filed by "Party Opponents".

In the final hearing of case 16970, the Board ruled to admit DDOT testimony regarding NCRC traffic. Since this was accepted after the record had been closed and since no one from DDOT was available for cross-examination regarding their submission, you allowed rebuttal of the document as long as it was "on-point" and "specific". You also gave a deadline for any submissions.

As stated in the November 14, 2003 fax cover sheet, DDOT sent a representative "to the NCRC site to evaluate the effectiveness of the Transportation Management Plan". Three times, a DDOT representative watched NCRC's new TMP during the morning drop-off, tabulated her observations and gave her conclusions. Three times, I watched NCRC's new TMP during the morning drop-off, tabulated my observations and gave my conclusions. I included six pictures to supplement those observations. To further "evaluate the effectiveness of the Transportation Management Plan," I also related two incidents that I witnessed during the time frame you gave, supplied a photo of one, and gave my conclusions.

What I submitted was fully within your direction and timely.

To accept DDOT's, Katherine Marshall's, Friends of NCRC's, and ANC 3-C's testimony and not to accept my or the Beckner's testimony would be arbitrary and capricious.

Respectfully Submitted,

Linda Badami by SRH
Linda Badami

Gaylord Neely and Linda Badami
3207 Highland Place NW
Washington DC, 20008

cc:
Maureen Dwyer
Friends of NCRC
Katherine Marshall
Steven Hunsicker
Bruce Beckner
Henry Little
Nancy MacWood

BZA
Case No. 16970
Exhibit No. 338

Board of Zoning Adjustment
District of Columbia
CASE NO.16970
EXHIBIT NO.338