GOVERNMENT OF THE DISTRICT OF COLUMBIA
BOARD OF ZONING ADJUSTMENT

Tudor Place Foundation, Inc. Application for Special Exception for Tudor Place at 1644 31st Street, and Dower House at 1670 31st Street, NW Square 1281, Lot 835	)	Application **No. 16974**

2003 JUL 25 P 12:42

31st.St. Parties Response to O.R.George Technical Memorandum.

The Technical Memorandum dated July 14, 2003 fails to consider parking and traffic conditions during the fall, winter and spring. This study was taken when a large percentage of area residents are on vacation. An accurate study of conditions and adverse impact must be conducted when every one is in town, not away on summer vacation.

The study is directed to large traffic problems and ignores any adverse impact of events which are less than 75 or 100 persons. The study is silent on events of less than 50 which are requested for 1670 on an unlimited basis (except that no more than 4 per month shall be rental).

Attached is a copy of the George Exhibit-2 which shows the situation along 31st. St. N.W. where the entrances to both 1644 and 1670 are located. The area of adverse impact by attendees parking in the evening (even groups less than 50) is shown in additional lines along 31st. St. and R Street. The location of the residences of the parties Wells, Morris and Snider are also now shown on the George Exhibit-2.

BZA
Case No. 16974
Exhibit No. 115

Board of Zoning Adjustment
District of Columbia
CASE NO. 16974
EXHIBIT NO. 115

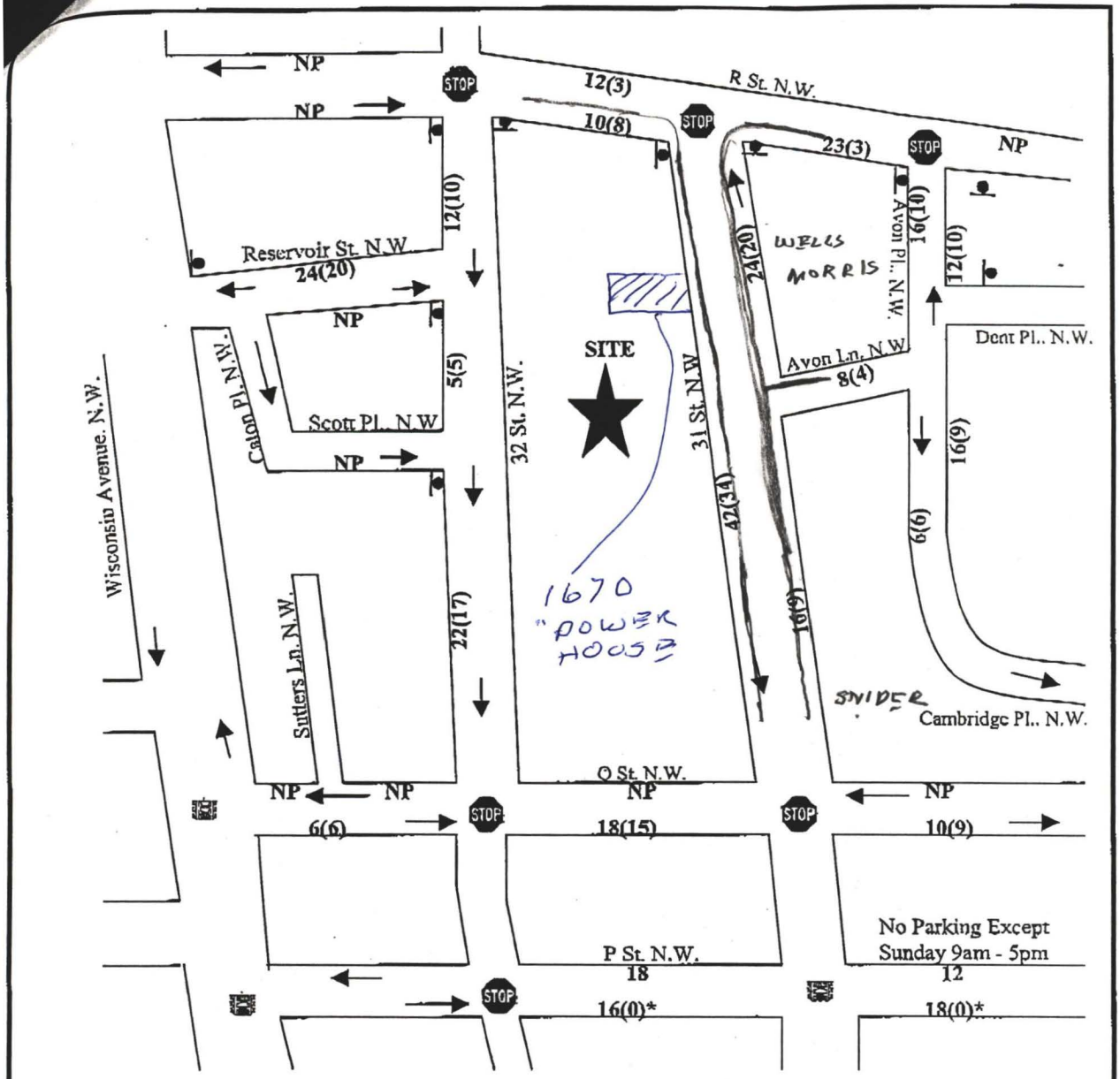
This study has failed to address the problem of less than 75 attendees and is at the wrong time of year. Applicant has not met its burden of proof of no adverse impact as required by 11 DCMR 217.

Respectfully Submitted,



Ronald R. Snider

for 31st. St. Parties



O. R. GEORGE & ASSOCIATES, INC. Traffic Engineers – Transportation Planners	**EXHIBIT - 2** **Tudor Place, 3100 Q Street N.W.** **Site Access and On-Street Parking Situation**

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the 31st. St. Parties "Opposition to Applicant's Motion to Reopen Record" and a copy of the 31st. St. Parties "Response to O.R. George Technical Memorandum" were served on July 21, 2003 upon:

Gordon C. Wilson
Hogan and Hartson
555 Thirteenth Street, N.W.
By FaX 202-637-5910

Donald W. Crocket
3070 Q Street
By HAND

Norton Katz
1671 32nd Street, N.W.
By HAND

Respectfully Submitted,

Ronald R. Snider
for 31st. St. Parties