BEFORE THE BOARD OF ZONING ADJUSTMENT
FOR THE DISTRICT OF COLUMBIA

IN THE MATTER OF	*	
	*	
2944 CHESAPEAKE STREET, NW	*	BZA Appeal No. 16764
WASHINGTON, DC	*	
	*	
DARREL GRINSTEAD, APPELLANT	*	

POST-HEARING SUBMISSIONS OF THE ZONING ADMINISTRATOR

Pursuant to the Order of the Board of Zoning Adjustment on October 23, 2001, the Zoning Administrator respectfully submits the following documents:

1. Copies of the Dictionary used by the Zoning Administrator in accordance with 11 DCMR §199.2(g). The relevant definition (2(a)(1)) used by the Zoning Administrator is highlighted. (Att. A)

2. Copies of digital photographs taken on November 9, 2001 depicting the front of the building as viewed by the Zoning Administrator in determining the proper point of measurement. (Att. B and C) The photographs demonstrate that the entire width of the building, clearly seen from the street facing the building, constitutes the front (the part facing forward), consistent with the testimony of Toye Bello. The photographs are accompanied by a copy of the Intervenor's most recent Location Survey (dated 9-25-01) indicating the location of the photographer for the photographs submitted herewith. (Att. D) The Zoning Administrator further adopts the photographs submitted by the Intervenor as true and accurate depictions of the building as seen from the street immediately facing the building.

RECEIVED
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Respectfully submitted,

ROBERT R. RIGSBY
Corporation Counsel, D.C.

SHARON STYLES-ANDERSON
Senior Deputy Corporation Counsel
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Acting Deputy Corporation Counsel
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BZA
Case No. 16764
Exhibit No. 42

Board of Zoning Adjustment
District of Columbia
CASE NO.16764
EXHIBIT NO.42

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Post-Hearing Submissions of the Zoning Administrator were faxed and mailed postage prepaid this 13th day of November, 2001 to James T. Draude, Esq., Driscoll & Draude, 1230 31st Street NW, 2nd Floor, Washington, DC 20007, Fax No.202-298-6699 and John Patrick Brown, Jr., Esq., Greenstein DeLorme & Luchs, P.C., 1620 L Street, NW, Suite 900, Washington, DC 20036-5605, Fax No. 202-451-1410.

Marie-Claire Brown
Assistant Corporation Counsel

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OF THE ENGLISH LANGUAGE UNABRIDGED

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GOVT./PLTF.
EXHIBIT A
CASE# 1676A



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PRINCIPAL COPYRIGHT 1961

Library of Congress Cataloging in Publication Data
Main entry under title:

Webster's third new international dictionary of
the English language, unabridged.

Includes index.
1. English language—Dictionaries. I. Gove,
Philip Babcock, 1902–1972. II. Merriam-Webster Inc.
PE1625.W36 1986 423 85-31018
ISBN 0-87779-201-1 (blue Sturdite)
ISBN 0-87779-206-2 (imperial buckram)

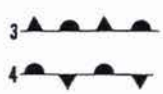
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MADE IN THE UNITED STATES OF AMERICA

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with unshaken ~ what comes — Theodore Roosevelt〉〈appeared with dauntless ~, accompanied by his par··our —T.B.Macaulay〉(2) : the o· visible, or feigned bearing or b of a person as contrasted w true or essential character, fee.. .., or condition〈the brave ~ she had maintained so long —T.B.Costain〉〈has good within him, behind a perfectly abominable ~ —Irving Stone〉〈a perpetually phony ~ of good fellowship is maintained —V.A. Young〉〈was putting up a ~ . . . in order not to distress this girl —Mary R. Rinehart〉; *also* : external and often feigned appearance (as of material prosperity or high social position)〈very good clothes at bargain prices — important to a man who must maintain a ~ —R.M.Yoder〉(3) : an artificial, affected, or self-important manner : show of vanity or haughtiness : AIRS〈he was very humble and had no ~ for a prince —*Time*〉(4) : stand or posture in reference to some issue or problem : POINT OF VIEW, OUTLOOK, POLICY, POSITION — chiefly used with *change*〈a change of ~ was signaled by his offer to come to terms〉〈suddenly changed ~ and threw in with the opposition〉 **c** (1) : the foremost rank (as of an army) : VAN (2) : a line of battle (3) *often cap* : a zone of conflict esp. between armies〈a division going up to the ~〉(4) : lateral space occupied by a military unit (5) — used as a military command of execution for individuals to turn their heads straight forward (as after dressing to the right)〈ready, ~!〉(6) — used as a call by a hotel desk clerk in summoning a bellboy (7) : a sphere or area of conflict or activity〈while men are always on fire over their opinions, they are rarely so on more than one ~ at a time —Curtis Bok〉〈the four ~s are military, economic, political, and psychological —*Congressional Record*〉〈progress on the educational ~〉〈a fairly quiet month on the athletic ~ —*Dartmouth Alumni Mag.*〉 **d** (1) : a coalition or movement linking persons, elements, or groups often of diverse political, ideological, or other tendency in an effort to achieve certain common objectives〈common unity and a common ~ are surely a pressing political need —Christopher Fremantle〉〈announced his purpose to be the erection of a solid ~ . . . a hemisphere wholly prepared to consult together for our mutual safety —R.W. Van Alstyne〉〈a united psychiatric ~ to frustrate the drive of courts and lawyers to make psychiatric testimony conform to antiquated concepts —Edward de Grazia〉; *specif* : a coalition of political parties of diverse ideological or other tendency for the achievement of certain common objectives — usu. used with a qualifier〈and to create a popular democratic ~ —*Collier's Yr. Bk.*〉〈the people's ~s represented an intermediate stage between Western and Soviet forms of democracy —Taylor Cole〉(2) : a person, group, or thing that is used to cover up or mislead concerning the identity or the usu. illegal, harmful, or self-serving true character, purpose, or activity of the actual controlling or directing agent : FACADE〈uses her as a ~ for his sinister machinations —*N.Y.Times Bk. Rev.*〉〈operated a florist shop as a ~ —Robert Shaplen〉〈assailed the . . . nominees as ~s for a party of privilege —*Collier's Yr. Bk.*〉〈all political groups and mass organizations are useful ~s to strengthen the party's influence —N.D.Palmer & S.C.Leng〉(3) : a person who serves as the official though often only nominal head or spokesman of an enterprise or group to lend it prestige : FIGUREHEAD〈a retired general with an impressive war record made an excellent ~ for the company〉 ▲ **2** : something that confronts or faces forward: as **a** (1) : a face of a building; *esp* : the face that contains the principal entrance (2) : the part of a theater in front of the curtain; *also* : the personnel engaged to work there (3) : the faceplate of a mortise lock through which the ends of the bolt are projected (4) : the part of a crab's carapace between the eyes (5) : FRONS 2 (6) : the forepart of the chest and forelegs in a quadruped (7) : the forepart of a garment〈a book . . . propped against his meager ~ of tweed —James Stern〉(8) : SHIRTFRONT (9) : DICKEY (10) : the part of the human figure opposite to the back〈lying on his ~〉 **b** (1) : the part or surface of something that seems to look out or be directed forward : the fore or forward part〈a grasshopper's back is really his ~ —J.B.S.Haldane〉(2) : land that faces or abuts (as on a body of water, a river, a road) : FRONTAGE〈a lake ~s〉; *also* : a promenade along the beach at a seaside resort〈they walked on the ~ together —W.S.Maugham〉(3) : a relatively narrow zone of rock characterized by concentration of some elements or scarcity of others relative to adjacent zones (4) : the end of a dynamo or motor shaft opposite to the end that carries the pulley or other coupling member (5) : the side of a paper machine from which it is operated (6) : the boundary between two dissimilar air masses — see COLD FRONT, WARM FRONT (7) : the part of the upper surface of the tongue behind the blade that lies opposite the hard palate when the tongue is at rest (8) : BELLY 5d **c** : the first part of something: as (1) *archaic* : the first part of a season or other unit of time : BEGINNING (2) **fronts** *pl* : the first portion of a distillate〈benzene ~s〉 **d** : something attached to the forepart: as (1) : false hair worn over the forehead by a woman (2) : the part of a bridle that crosses the forehead — see BRIDLE illustration **3 a** : a position directly before or ahead of a person or before the foremost part of a thing〈with six seconds to go he forged out in the ~ of his rivals〉〈a tree stood in the ~ of the yard〉 **b** : a position of leadership, advantage, or superiority in any field〈an indefatigable worker, he rapidly made his way to the ~ of his profession〉 — **front and center** **1** — used as a preparatory military command before "march" for certain designated individuals to march to the front of the center of a formation **2** — used as a call for someone not in sight to come forward — **in front of** *prep* : directly before : before the foremost part of : ahead of〈watching the road *in front of* him〉〈a tree stood *in front of* the house〉〈frightened of what lies *in front of* them —*Isis*〉〈*in front of* him were two Union lines —G.J.Fiebeger〉 — **out front** *adv* : in the audience

front \"\ *vb* -ED/-ING/-S [partly fr. MF *fronter*, fr. *front*, n.; partly fr. ¹*front*] *vi* **1** : to have or turn the face or front in a specified direction : FACE〈the house ~s toward the east〉 **2 a** : to act as a sponsor, advocate, or spokesman〈the persons who had gotten them jobs ~*ed* for them in time of stress —C.R.Cooper〉〈his ability to . . . ~ for the U. S. in world affairs —*Time*〉 **b** : to serve as a front〈~*ing* for oil interests —*Current Biog.*〉〈the top men in the community have little time for committee meetings; they send a lesser man to ~ for them —O.S.Strong〉 ~ *vt* **1 a** : to face up to : CONFRONT〈went to the woods because I wished . . . to ~ only the essential facts of life —H.D.Thoreau〉〈loses his job . . . and with it his ability to ~ life benignly —J.P.Bishop〉 **b** : to appear before : meet face-to-face〈daily ~*ed* him in some fresh splendor —Alfred Tennyson〉 **2 a** : to stand in front of : serve as a front to〈a lawn ~*ing* a house〉 **b** : to be the leader of (a dance orchestra)〈appeared as soloist in reviews, in addition to ~*ing* bands —*Esquire's Jazz Bk.*〉 **3** *obs* : BEGIN, INTRODUCE, PREFACE **4** : to supply a front to : put a facing upon〈~*ed* the building with brick〉 **5** : to face or look toward : have the front toward, opposite, or over against



front 2b(6): symbols used on weather maps to indicate *1* cold front, *2* warm front, *3* occluded front, *4* stationary front

front-age \'frənj, -tij\ *n* -S [*front* + *-age*] **1 a** : a portion of land that fronts (as on a stream, body of water, or road)〈the Romans won . . . a ~ on the Atlantic ocean —A.J. Toynbee〉〈states of the Union . . . which have a salt-water ~ —··· *tional Record*〉; *also* : the extent of front〈has a lake ··roximately two miles —*Amer. Guide Series: La.*〉 **b** : ··· between the front of a building and the street **2** : ··· part or face of a building〈dirty plaster ~*s* embossed with scrollwork and heraldic devices —Christopher Isherwood〉〈the pillars of its colonnaded ~ —Claud Cockburn〉 **3** : the act or fact of facing a given way : EXPOSURE **4** : something that belongs to, is part of, or appears in or on a front〈a dazzling ~ of flowers and faces —Leonard Merrick〉 **5** : the lateral extent of responsibility of a military unit : the width of a zone of military action in an attack : the width of a military sector in defense

front-ag-er \-jə(r)\ *n* -S : one that holds the frontage (as on a road or on water)

frontage road *n* : a local street or road generally paralleling an expressway or through street on one or both of its sides to collect local traffic and provide access to property isolated from the expressway through access controls — called also *service road*

¹fron-tal \'frənt°l\ *sometimes* -rən-\ *n* -s [in sense 1, fr. ME *frountel*, *frontel*, fr. MF *frontel*, fr. L *frontale*, fr. *front-*, *frons* + *-ale* (neut. of *-alis* -al); in sense 2, fr. ME *frountel*, *frontel*, fr. ML *frontellum*, dim. of L *front-*, *frons*; in other senses, fr. ²*frontal*] **1** : something worn across the forehead; *specif* : an ornamental band often of jewels . **2** : a movable decorative piece (as of rich stuff or embroidery) covering the front of an altar in a church **3** : FACADE **4 a** : FRONTAL BONE **b** : a frontal scale or plate

²frontal \"\ *adj* [NL *frontalis*, fr. L *front-*, *frons* forehead + *-alis* -al — more at BRINK] **1 a** : of or relating to the forehead or the frontal bone **b** : of or being a scale or plate lying between the eyes and over the frontal bone in a reptile **2 a** : belonging to the front part〈a ~ appendage〉 **b** : of or relating to the front : taking place from or at the front〈to cease all ~ resistance and to limit its activity to guerrilla warfare —D.J. Dallin〉 **c** : directed against the front : delivered upon the main or essential point or issue : DIRECT〈a ~ assault on the enemy〉〈~ attack . . . on broad problems of human nature —F.A.Geldard〉 **3 a** : parallel to the main axis of the body and at right angles to the sagittal plane **b** : having or showing frontality **4** : of or relating to a meteorological front **5** : FRONT 2 — **fron-tal-ly** \-°lē,-°li\ *adv*

frontal angle *n* : the angle formed by the intersection of lines from the bregma and glabella to the auricular point

frontal apron *n* : APRON 5

frontal artery *n* : one of the terminal branches of the ophthalmic artery

frontal bone *n* : one of a pair of membrane bones of the upper front part of the cranium next anterior to the parietals, in man becoming united into a single bone that forms the forehead and upper part of the orbits

frontal convolution *or* **frontal gyrus** *n* : any of the convolutions of the outer surface of the frontal lobe of the brain

frontal crest *n* : a median ridge on the internal surface of the vertical part of the human frontal bone

frontal eminence *n* : the prominence of the human frontal bone above each superciliary ridge

frontal gibbosity *n* : a protuberance on the head of certain male fishes prominent as sexual maturity is reached

frontal index *n* : the ratio of the least breadth of the forehead to its greatest breadth multiplied by 100

fron-ta-lis \,frən-'talȯs, frān--, -tāl-,-tāl-\ *n* -ES [NL, fr. *frontalis* frontal] : the muscle of the forehead that forms part of the occipitofrontalis

fron-tal-i-ty \,frən-'talad-ē, frān--\ *n* -ES **1** *in sculpture* : a schematic composition of the front view that is complete without lateral movement **2** *in the pictorial arts* : an arrangement of one or more planes parallel to the picture plane

frontal lobe *n* : the anterior division of each cerebral hemisphere having its lower part in the anterior fossa of the skull and being bordered behind by the central sulcus

frontal nasal spine *n* : a median process projecting down from the frontal bone and articulating with the two nasal bones — called also *superior nasal spine*

frontal nerve *n* : a branch of the ophthalmic nerve supplying the forehead, scalp, and adjoining parts

frontal shield *also* **frontal plate** *n* : a platelike prolongation of the base of the upper mandible over the forehead that is a characteristic feature of the coots and gallinules

frontal sinus *n* : either of two air spaces lined with mucous membrane that lie within the frontal bone above the orbit on each side

frontal vein *n* : a vein of the middle of the forehead that unites with the supraorbital to form the angular vein near the inner angle of the orbit

front bench *n* : either of the two benches nearest the chair in the British House of Commons or House of Lords occupied by government and opposition spokesmen — compare BACK BENCH

front bencher *n* : a government or opposition spokesman in the British House of Commons or House of Lords

front-connected switch \'=,=-=\ *n* : a switch in which the conductors are fastened to terminals in front of the mounting

front court *n* : a basketball team's offensive half of the court

front dive *n* **1** : a dive in which for the takeoff the diver faces the water **2** : one of several competitive dives including those in which the body rotates forward from a front takeoff — compare BACK DIVE, INWARD DIVE, REVERSE DIVE, TWIST DIVE

front door *n* **1** : the main entrance to a dwelling or apartment having more than one entrance : a doorway fronting on or giving direct access to a street or road **2 a** : a place or area affording the main or best approach or access (as to a country)〈the war would then be brought directly to the *front door* of the Americas —Emil Lengyel〉 **b** : an open direct forthright approach or a legal approach toward gaining some object〈should do it directly and openly, through the *front door* —*Yale Rev.*〉

front drop *n* : a fundamental trampoline stunt consisting of dropping to a prone position on the bed with the head up and then rebounding to a standing position

front-ed \'frənt-əd\ *adj* : having or furnished with a front of a specified kind or quality〈plaster-*fronted* houses . . . painted in garish colors —James Reach〉〈a tuck-*fronted* shirt —*New Yorker*〉

¹fronter *comparative of* FRONT

²fronter *n* -S [¹*front* + *-er*] : one who is a member of an organization which is or is alleged to be a front〈a Communist ~ —Hillel Silver〉

frontes *pl of* FRONS

front-fanged \'=,=\ *adj* : having grooved or perforated venom-conducting teeth in the front of the mouth — used chiefly of members of the Proteroglypha; compare BACK-FANGED, PIT VIPER

front flap *n* : the part of a book jacket that folds over and onto the inside of the front board

front foot *n* : a foot measured along the front of a piece of property — called also *foot front*

front-foot rule *n* : a method of property assessment based upon the length of frontage of the property

or line of inqui··· farthermost lim··· ~s of linguistic··· the ~ of politi··· the atomic ~ la··· modern science— crust —W.H.Bud··· or opposed thin··· —T.S.Eliot〉 **d** ··· offers scope for ··· 〈a large econon··· sion destined to ··· *Alumnus*〉〈the ··· Wilson〉

²frontier \"\ *adj* ··· : BORDERING, CO··· withdrawn〉 **2** ··· America : chara··· 〈turning to the t··· ton〉〈the hardshi··· **3** : advancing or ··· achievement : EX··· manities —C.E···

³frontier \"\ *vt* ···

fron-tiers-man \ ··· living on the fron···

fronting *pres part* ···

fron-tis \'frantəs ··· : FRONTISPIECE

¹fron-tis-piece \' ··· fluenced by *piece*) ··· *spicium* front of a ··· *frons* forehead, ..b··· look, look at) — m··· of a building; *esp* ··· tively treated **b** : ··· over a portico or ··· door) **2 a** *obs* : T··· or illustration on ··· : the page itself c··· the title page of a ··· book; *also* : the p··· which details are ··· way

²frontispiece \"\ ··· act as a frontispiece

front-less \'frantl··· **2** *archaic* : SHAMEL···

front-let \-lət, *usu* ··· fr. MF *frontelet*, d··· *-let* — more at FR··· black velvet ~ just ··· Yarwood〉 **b** : PH··· 6:8(AV)〉 **2** : a ··· facade **b** : SUPER··· altar frontal **3 a** : ··· **b** : the forehead o··· color or texture of ···

frontlighting \'=,=-=\ ··· graphic subject fro···

front line *n* **1** : a ··· tactical units in a ··· of contact with an ··· responsible, or van··· struggle〈constantly ··· —F.S.Philbrick〉

frontline \'=,=\ *adj* ··· at the front〈a new··· *Bull.*〉 : relating to ··· cultural news —*At*··· schools are the ··· tr···

front man \'=,=\ *n*, ··· almost certainly be ··· succeeded in capturi··· leading law firms ··· or histrionic abilit··· mously through *fron*··· sional *front man* wi··· barker esp. for a sho··· *front man* for a mag··· a dance orchestra 〈··· from the improvisati···

front matter *n* : ma··· called also *prelima*···

fronto- *comb form* [··· front — more at BRI··· : frontal lobe and 〈··· ary of an air mass 〈···

front office *n* : the he··· making staff〈play t··· what the *front office* ··· —R.D.Altick〉

fron-to-genesis \,fra··· *genesis*] : the coming ··· rents of air in such ··· sharpened between th··· each other to induce ···

front-o-ly-sis \,fran··· **frontoly-ses** \-ə,sēz ··· tending to destroy a ··· mixing and divergenc···

¹fron-ton \,frən-'tōn, ··· *frontone*, aug. of *front* ··· pediment esp. over a ···

²fron-ton \'frän-,tän, ··· ence of L *front-*, *fron* ··· *frons* — more at BRIN··· jai alai

fron-to-occipital \,fr··· : of or pertaining to t···

fron-to-parietal \"+ ··· to, or involving both ···

frontoparietal suture ···

fron-to-pontine \"+ ··· E *-ine*] : of or relating ···

frontopontine tract *n* ··· cortex and ending in t···

¹front-page \'=,=\ *adj* ··· ing on the front pag··· 〈*front-page* news〉 — ···

²front-page \"\ *vt* [*¹* ··· (an event) on the fro··· 〈every newspaper in th··· White〉

frontpiece \'=,=\ *n* : ··· something

front-porch campaig··· the candidate instead ··· issuing written stateme··· his home community ···

front-rank \'=,=\ *adj* ··· : ranking among the b··· : FIRST-RATE〈emerges



NOV.9.2001 DSC3213.jpg

GOVT./PLTF.
EXHIBIT B
CASE# 1676A



NOV.9.2001 DSC3216.jpg

GOVT./PLTF.
EXHIBIT C
CASE# 1676A

LOCATION SURVEY
SQUARE 2256 LOT 30
2944 CHESAPEAKE ST,N.W.
WASHINGTON, DC.

SCALE: 1"= 20'

CHESAPEAKE STREET, N.W.

LOT 852

LOT 872

LOT 871

LOT 30

LOT 841

2944

R=50.0
39.27
N 45°05'30" E
109.98
22.77
8.01
21.04
13.71 PORCH 8.0
29.04
21.38
8.0
33.83
10.16
8.57
8.0
STOOP
11.05
8.63
7.75
6.0
21.40
2.70
6.78
6.56
6.0
2.18
49.35
46.14
2.0
(23'-4 3/8")
25.39
91.42
N 63°42' W
(22'-2 1/2")
22.20
7.0
15.61
(25'-8 3/4")
26.73
108.13
S 16°48'22" W

20 10 0 10 20
SCALE: 1"= 20'

THIS PROPERTY IS SUBJECT TO RESTRICTIONS OF RECORD.
THIS SURVEY WAS PREPARED WITHOUT THE BENEFIT OF A TITLE REPORT

CERTIFICATE

I HEREBY CERTIFY THAT THIS POSITION OF ALL THE EXISTING IMPROVEMENTS ON THE ABOVE DESCRIBED PROPERTY HAS BEEN CAREFULLY ESTABLISHED BY A TRANSIT-TAPE SURVEY.

RICHARD KEHR
PROFESSIONAL LAND SURVEYOR No.

REFERENCES
BOOK 193
PAGE 144
LIBER
FOLIO
FIELD BOOK
PAGE No.

WEST CONSULTING GROUP, INC.
4424 MONTGOMERY AVENUE,
BETHESDA, MARYLAND 20814
(301) 654-7907 654-7938 (FAX)

DATE OF SURVEY:
WALL CHECK
HOUSE LOC. 09-25-01
BOUNDARY

SCALE: 1"= 20'
DRAWN BY: R.D.P.
JOB No. 01-034

GOVT./PLTF.
EXHIBIT D
CASE# 16764