



December 13, 2010

City of Sumner
Community Development
1104 Maple Street, Suite 250
Sumner, WA 98390

**RE: Memory Haven of Sumner, Proposed Dementia Care Residences
Conditional Use Permit – Criteria to Grant (SMC 18.48.050)
Sumner Project No. PRE2010-00016, HEC Project No. 2010.46-49**

Dear Ms. Coleman:

Our Client, MJH Property Management, LLC, is proposing the construction of a dementia care residence facility, to be named "Memory Haven of Sumner", on the aforementioned parcels located adjacent to 5103 Parker Road East. The site is currently vacant, having a total site area of just over 1 acre.

The project site is currently zoned High-Density Residential (HDR). We understand that a Conditional Use Permit is required for "homes for the aged; assisted living facilities, continuing care communities, board and care homes, hospices, or nursing homes" in the HDR zone, per Sumner Municipal Code (SMC) 18.14.040 G. Therefore, in accordance with SMC 18.48.050, we provide the following responses to the criteria to grant a Conditional Use Permit:

A. The proposed use will not be materially detrimental to the public welfare or injurious to the property or improvements in the vicinity of the proposed use or in the district in which the subject property is situated.

The project site is surrounded by residential uses in all directions. This proposal is first and foremost a residential community, providing housing and care for elderly residents. Furthermore, there are at least two other assisted living facilities along Parker Road to the south of the site. This proposal is a smaller scale than the other existing facilities, resembling a small multi-family residential development. Our goal is to provide an assisted living facility that looks and feels like a home to our residents and neighbors, not a clinic, hospital, or critical care facility.

Property frontage improvements are proposed on both Parker Road and Elm Street, to include roadway widening, curb, gutter, and sidewalk installation, and Low Impact Stormwater Facilities. These improvements will provide wider traveling lanes, on street parking for this proposal as well as adjacent parcels, and safer pedestrian facilities separated from the vehicular roadway. Said frontage improvement design will be per City of Sumner design guidelines and regulations and as to be agreed through the Design Review process. Rather than being detrimental, these improvements will be a new asset to the community and directly benefit the surrounding properties.

Finally, we would like to stress that this proposal poses no threat or danger to the community. None of the residents drive, limiting vehicular trips to and from the facility as well as the potential for costly and dangerous vehicular accidents. Dementia care

operations make great neighbors for many other reasons, including the following: no loud music or parties, no racing cars, or other noise-related nuisances typical of residential developments. We propose a secure interior and exterior homelike environment for the safety of our residents. Exists to the exterior outside of the secure resident yard will be magnetically locked, requiring keypad entry of a guarded code. These doors will unlock if the fire alarm sounds as required by applicable fire codes. We have taken several other precautions in our site design, such as the secured fenced courtyard for resident and visitor use, the shallow ponding depth in the proposed rain gardens, and the deliberate lack of crosswalks and pedestrian / vehicle crossings.

B. The proposed use shall meet or exceed the performance standards that are required in the district it will occupy.

The performance standards required in the HDR zone, as listed under SMC 18.14.080 and provided below for reference, are addressed as follows:

- A. *Exterior Mechanical Devices.* Air conditioners, heating, cooling, ventilating equipment, swimming pool pumps and heaters and all other mechanical devices shall be screened from surrounding properties and streets and shall be so operated that they do not disturb the peace.

Any and all exterior mechanical devices will be screened from surrounding properties and streets, preventing both visual disturbance and noise pollution, as to be agreed through the Design Review process. We may utilize individual heating and cooling units for each of the proposed rooms, as elderly residents are often particular about control of their own environment and comfort. Said units would be highly energy efficient and low in noise pollution.

- B. *Landscaping Required.* In all MDR and HDR zones landscaping and open space shall be provided. All required landscaping shall be permanently maintained in a neat and orderly condition. For new developments, a landscape plan shall be submitted for review by the community development director. Proposals requiring design review shall comply with the city of Sumner design and development guidelines.

Landscaping will be provided and maintained according to City of Sumner regulations and as to be agreed through the Design Review process. We also propose use of Low Impact Stormwater Facilities (i.e., rain gardens) for onsite stormwater management, which will be integrated into the landscaping plan. Alternative paving surfaces may be utilized, particularly on the proposed one-way drive aisle between the visitor and employee parking areas, as determined through the design process.

- C. *Outdoor Storage and Parking of Vehicles.* Storage or parking of any motor vehicle or vehicle accessory such as camper shells, boats, trailers, motorbikes or other wheeled accessory or conveyance shall not be allowed except as follows: 1. Storage of such vehicles and vehicle accessories is permitted within the paved areas and driveways located in the front and street side yard; and rear and interior side yards; provided, that such vehicles and accessories are screened from neighboring properties and public rights-of-way by a six-foot-high solid fence or landscaped screen. For purposes of this subsection "storage" means the keeping of such vehicles and accessories on any portion of any parcel of property for a period of 120 continuous hours, and 2. Parking for any length of time of such vehicles and vehicle accessories is prohibited within any landscaped area of the front or street side yard, except for parking for the washing of vehicles and not to exceed two hours.

There shall be no outdoor storage of vehicles or accessories on the property, with exception to vehicles parked in delineated parking stalls being used by staff and/or visitors. An enclosed garage is proposed for storage of any equipment and vehicle accessories, which is integrated into one of the proposed residence structures, not being a separate detached structure. This will limit the building footprint impact on the site as well as help match the look and feel of the proposed site with adjacent properties.

- D. Setbacks from Alleys. Garage structures which are directly attached to a principal structure or attached with no greater than an enclosed breezeway, and have vehicular access from an adjacent alley, may encroach into the rear yard such that the total of the alley width and setback from the alley is equal to no less than 24 feet. In such case, only a garage attached to the principal structure by no greater than a breezeway may exceed a height of one story.*

No alleys exist nor are proposed for this project. The proposed garage is integrated into the east proposed building, situated away from the main site entry and not protruding or otherwise standing out from the structure. Finally, the access to the proposed garage will be facing the employee parking area, away from the proposed visitor parking area and main entry.

- E. Yard Projections. Every required front, rear and side yard shall be open and unobstructed from the ground to the sky unless otherwise provided: 1. Fences and walls as specified and limited under subsection (K) of this section may project into a required yard. 2. Fireplace structures not wider than eight feet measured in the general direction of the wall of which it is a part may project into a required yard by not more than 30 inches. 3. Cornices, sills, eave projections and awnings without enclosing walls or screening may project into a required yard by not more than 30 inches. 4. Bay windows and garden windows which do not require a foundation may project into a required front, rear, or street side yard by not more than 30 inches. 5. Planting boxes or masonry planters not exceeding 30 inches in height may project into a required yard. 6. Open, unenclosed, unroofed decks may project into a required rear or interior side yard, providing, however, that the decks are constructed at grade elevations, or in no event exceed 30 inches above adjoining grade and not over any basement or story below. 7. Additions of accessory structures such as stairs or balconies, covered porches or unroofed decks which have no more than 200 square feet, provided lot coverage is not exceeded may project into a required front or rear yard. 8. Detached accessory buildings on the rear 33 percent of the lot, or in back of the front 75 feet of the lot, are permitted not closer than three feet to side property lines nor three feet to rear property lines or alleys, except that detached accessory garages, which use an alley for vehicular access, may intrude such that the total of the alley width and setback from the alley equal no less than 24 feet. The maximum building height for a detached accessory structure shall be 16 feet for gabled, hipped and gambrel roofs and 12 feet for flat and mansard roofs.*

There are no proposed yard projections that will conflict with these provisions. Any and all yard projections will be reviewed during the design process.

- F. Residential antennas, including satellite dish antennas less than or equal to three feet in diameter, shall not be located between the front or street side property lines and a building, and shall be limited to a height of 10 feet in excess of the maximum height required for each zone. Antennas shall be set up so that in case an antenna falls it will fall within the confines of the owner's property. Satellite dish antennas greater than three feet in diameter and amateur radio towers and associated antennas are regulated below: 1. Satellite Dish Antennas Ground-Mounted. Ground-mounted, satellite dish antennas are allowed as permitted accessory uses subject to the following requirements: a. The*

antenna shall not be located between the front property line or street side property line and a building; such antennas may be located in a rear or interior side yard. b. The maximum diameter shall be 12 feet. c. The maximum height shall be 15 feet in height above the existing grade to the highest point of the dish. d. The minimum setback shall be no less than three feet to rear or side property lines as measured when the dish is in a horizontal position. e. Satellite dish antennas shall be located to prevent obstruction of the antenna's reception window from potential permitted development on adjoining properties. f. Satellite dish antennas shall be constructed of transparent material such as wire mesh; and shall be finished in a dark color and a nonlight-reflective surface. g. All installations shall include screening treatments located along the antenna's nonreception window axes and low-level ornamental landscape treatments along the reception window axes of the antenna's base. Such treatments should completely enclose the antenna and consist of no less than three landscape elements which provide year- round screening. Landscape plans shall be reviewed by the director. h. Dish antennas shall be installed and maintained in compliance with the applicable requirements of the International Building Code, as amended. i. Only one dish antenna shall be permitted on any residential lot. j. Dish antennas shall not be installed on a portable or movable device, such as a trailer. k. The antenna shall be set up so that in case an antenna falls it will fall within the confines of the owner's property. 2. Satellite Dish Antennas, Roof-Mounted. Roof-mounted satellite dish antennas which have a maximum of 12 feet in diameter may only be allowed upon approval of a variance application in accordance with chapter 18.50 SMC. In addition to the review criteria of SMC 18.50.030, the following criteria shall be met: a. Demonstration by the applicant that compliance with subsection (F)(1) of this section would result in the obstruction of the antenna's reception window, prohibiting a usable signal; furthermore, such obstruction involves factors beyond the control of the applicant. 3. Amateur radio towers and antennas for use by a noncommercial, licensed amateur operator shall be allowed if such facilities: a. Are not located between the front or street side property line and a building. b. Are limited to a height of 10 feet in excess of the maximum height required for each zone. c. Are installed with a reasonable effort to minimize visibility from adjacent properties while still permitting effective operation. d. Are located and constructed in a manner that will prevent the installation from falling onto adjoining properties. e. Do not interfere with nearby utility lines, etc. f. Such installations which propose to exceed the maximum height restrictions, but which meet all of the above criteria in subsections (F)(3)(a) through (e) of this section, may only be allowed upon approval of a variance application in accordance with chapter 18.50 SMC.

If any residential antennas as described above are desired for the proposed project, their placement will meet all of the above requirements and as agreed through the Design Review process.

- G. Swimming Pools. All swimming pools having a depth of 24 or more inches shall maintain a protective fence, wall or enclosure not less than five feet in height, with no opening greater than four inches wide and equipped with a self-closing gate surrounding said pool. This requirement shall also apply to other outdoor bodies of water having a depth greater than 24 inches, excluding natural lakes, streams, rivers, or drainage ditches.*

There are no swimming pools anticipated under this proposal. The proposed Low Impact Stormwater Facilities shall have a maximum ponding depth of six (6) inches or less, with said ponding occurring during and after significant storm events.

- H. Building Height Exceptions. Chimneys and vents, and church steeples and church spires, may be erected to a height greater than the permitted building height set forth.*

No elements of the proposed buildings are anticipated to exceed the allowed 35-foot height in the HDR zone.

- I. Trash Receptacles. Except on trash pickup days, all trash receptacles shall be screened from neighboring properties and public rights-of-way by an opaque visual barrier no lower than the maximum height of the receptacles. Provision of recycling bins shall be made. These shall be located near the trash receptacles and screened as required above.*

The proposed trash receptacles will be located away from the streets and screened / fenced as per Sumner regulations and as determined through the Design Review process. We anticipate said receptacles to be located near the employee parking area, away from the visitor parking area and main entry, but near to the residence structures and proposed integrated garage.

- J. School and Church Height Exceptions. When applicable, a height exception shall be applied for as part of a conditional use permit application to establish such uses or expansion of such uses. Conditionally permitted school and church uses may exceed building height requirements to a maximum of 50 feet in the MDR and the HDR zones upon approval of such height exception by the hearing examiner. A height exception does not require separate application for a special exception or variance.*

Does not apply – This proposal does not include a school or church.

- K. Fences – Intent. The intent of this section is to establish minimum requirements and standards for fences in order to promote safety, provide screening, and to protect the aesthetic assets of the community. Fences constructed within multifamily zones shall not exceed a maximum height above the adjacent grade as set forth herein: 1. The requirements of this subsection shall apply only to fences built after the adoption date of the ordinance codified in this section. Fences built before that date shall be considered legal nonconforming fences. Existing fences being replaced after this adoption date shall meet the requirements of this section. The construction of any fence, arbor, or trellis requires a building/land use permit. 2. Fences located within the required front yard or within a five-foot setback from the street side property line shall not exceed a height of three feet where fences would provide less than 50 percent visibility. Fences providing at least 50 percent visibility shall not exceed a height of four feet within the required front yard or within a five-foot setback from the street side property line. Examples of fences that could meet the 50 percent visibility include spaced rail fences, spaced picket fences, and chain link fences. 3. Corner lots located along minor arterials may construct a fence to the maximum height with a zero side yard setback along the minor arterial; provided, that all sight distance requirements are met. 4. No fence shall exceed a total height of six feet above existing or finish grade in a multifamily zone, unless exceptions of subsection (K)(9) of this section apply. 5. Fences utilized to enclose drainage detention ponds or other drainage facilities shall meet the requirements of the King County Washington Surface Water Design Manual, as well as any other applicable regulations of this section and the Sumner Municipal Code. Chain link fences used to enclose drainage detention ponds or other drainage facilities shall be green or black coated or painted. 6. No barbed wire, razor wire, or electric fence shall be allowed within multifamily zones, unless exceptions of subsection (K)(9) of this section apply. 7. Chain link shall be black or green coated or painted in the front or street side yard. 8. Arbors and trellises will be subject to the following: a. An arbor of up to three additional feet in height to a nine-foot maximum can be constructed over a gate, walkway, or entryway. The maximum width of an arbor shall be eight feet. These requirements apply to arbors sited in the front and side yard and to arbors attached to fences. Arbors shall be of structurally sound design. b. A trellis of up to two additional feet in height to a maximum of eight feet may be added to a fence as a decorative element. Trellises with a horizontal element shall not encroach onto adjacent properties. Trellises shall be a structurally sound part of the fence design. 9. Exceptions to the standards set forth in this subsection are listed as follows: public facilities, minor and major utility facilities, schools, and wireless communication facilities may have fences higher than the required six-foot maximum for safety and security*

reasons, and are not subject to the requirements of this section. Such facilities needing added public safety and security shall construct fences in accordance to the standards set forth for such facilities. 10. Through lots with frontage along minor arterials may construct a fence to the maximum height with a zero setback along the minor arterial; provided, that all sight distance requirements are met.

All proposed fencing shall meet these requirements and be as agreed through the Design Review process. We anticipate use of six-foot black or green vinyl-coated chain link fencing for the secure courtyard area, and otherwise aesthetically pleasing chain link and/or rail fencing around the remainder of the property and integrated into the landscaping plan. Said fencing may be slatted or otherwise sight obscuring along project boundaries to protect adjacent sites from unintentional nuisances, such as light from onsite lighting and/or vehicle headlights.

- L. *Sight Distance Requirements. At all intersections there shall be a triangular yard area within which no tree, fence, shrub, wall or other physical obstruction shall be permitted higher than three feet above the adjacent grade where fences, walls and hedges would provide less than 50 percent visibility. Fences, walls, and hedges providing at least 50 percent visibility shall not exceed a height of four feet. Examples of fences that could meet the 50 percent visibility include spaced rail fences, spaced picket fences, and chain link fences. This triangular area shall measure as follows: 1. Street Intersections. At any intersection of two street rights-of-way, two sides of the triangular area shall extend 20 feet along both shoulder or curblines of the improved portion of the rights-of-way, measured from their point of intersection. For the purpose of this subsection, an alley shall be considered as a street. 2. Street and Driveway Intersections. At any intersection of a street right-of-way and a driveway, two sides of the triangular area shall extend 20 feet along the edge of the driveway and 10 feet along the shoulder or curbline of the improved portion of the right-of-way, measured from their point of intersection. Such triangular area shall be applied to both sides of the driveway. 3. Fences utilized to enclose drainage detention ponds or other drainage facilities shall meet the above regulations, as well as any other applicable regulations of the Sumner Municipal Code.*

No fencing or landscaping greater than 3-feet in height will be permitted in the sight distance triangle as specified above and as agreed through the Design Review process.

- M. *Expansion of Specified Existing Uses. Existing automotive and motorized vehicle sales and rental agencies lawfully operating as of June 1, 2000, may be maintained as follows: 1. The specified uses may expand, except that expansion shall not occur if it is necessary to purchase additional property. The expansion shall meet the development standards of the zone such as setbacks, lot coverage, and building height. 2. Structures may be rebuilt after a fire or other disaster to original dimensions, or expanded per requirements in this section, unless a health or safety impact would occur. 3. If expansion requires any increase in impervious surface, a 10-foot landscaped yard setback shall be created and solid six-foot masonry wall or wood fence established and maintained along the property line that abuts residential properties, except that fences and walls located within the required front or street side yard shall not exceed a height of three feet. The landscape buffer shall contain a planting of trees with a minimum of eight feet in height at planting and a minimum of 20 feet at maturity. Trees shall be a mix of 50 percent deciduous and coniferous and planted 15 feet on center. 4. Any expansion shall meet the performance standards set forth in SMC 18.16.080 and design review standards per chapter 18.40 SMC.*

As the site is currently vacant and unimproved, no expansion of any existing use is proposed.

- N. Manufactured homes shall meet all of the following conditions: 1. Manufactured homes shall be new; 2. Manufactured homes shall be set upon a permanent foundation and the space from the bottom of the home to the ground shall be enclosed by concrete or an approved concrete product which can be either load-bearing or decorative; 3. Manufactured homes shall be thermally equivalent to the State Energy Code; 4. Manufactured homes shall have exterior siding similar in appearance to siding materials commonly used on site built single-family homes; 5. The roofs of manufactured homes shall be constructed with a shake or shingle, coated metal, or similar material with a nominal roof pitch of 3:12; and 6. Manufactured homes shall be comprised of at least two fully enclosed parallel sections each of not less than 12 feet wide by 36 feet long.*

No manufactured homes are present or proposed.

- O. A minimum of 50 percent of the area of front and street side yards shall be landscaped with vegetation or other landscaped features other than paving, gravel, or hard surfaces.*

At least 50% of the front yard areas along both Parker Road and Elm Street will be landscaped, as agreed through the Design Review process.

Also, while being an assisted living facility, the proposed dementia care residence follows some of the intent of a retirement home, which is a permitted use in the HDR zone. As defined in SMC 18.04.0900, "Retirement homes" mean apartments in an apartment complex with extra services included in the rent, such as meals, light housekeeping, laundry and recreational programs. The proposed dementia care residence will contain individual rooms (or units) in a single complex providing extra services included in the rent, including but not limited to meals, housekeeping, laundry, and recreational programs for residents.

Finally, Table 18.14.070 provides several property development standards for the HDR zone. The maximum development density provided is 25 dwelling units per acre. Assuming two residents per dwelling unit on average, this would allow approximately 50 residents per acre. Our proposal contains up to 26 beds, falling well below this threshold. Front yard setbacks of 10 feet are provided from both Parker Road and Elm Street. A rear yard setback of 20 feet is proposed from the east boundary, and side yard setbacks of 5 feet from all other exterior boundaries. The proposed buildings are currently planned to be about 24 feet tall, falling below the maximum height allowed of 35 feet. Finally, the proposed lot coverage is less than 30%, falling below the maximum threshold of 45%.

C. The proposed development shall be compatible generally with the surrounding land uses in terms of traffic and pedestrian circulation, building and site design.

As mentioned above, the project site is surrounded by residential uses in all directions. This proposal is first and foremost a residential community, providing housing and care for elderly residents. This proposal is a smaller scale than other assisted-living facilities in the area, resembling a small multi-family residential development. Our goal is to provide an assisted living facility that looks and feels like a home to our residents and neighbors, not a clinic, hospital, or critical care facility.

In regard to traffic and pedestrian circulation, property frontage improvements are proposed on both Parker Road and Elm Street, to include roadway widening, curb, gutter, and sidewalk installation, and Low Impact Stormwater Facilities. These improvements will provide wider traveling lanes, on street parking for this proposal as well as adjacent parcels, and safer pedestrian facilities separated from the vehicular roadway. Onsite parking shall be provided per City design regulations, limiting the need

for on-street parking, and footpaths are proposed connecting the frontage improvements along Parker Road to the facilities. Furthermore, the anticipated traffic demand from this project is much lower than that of a typical multi-family development, as none of the residents will have their own vehicles and most will have irregular visitations. A one-way vehicular access is proposed leaving the visitor parking area toward Elm Street, allowing an alternate exit point for visitors with greater available sight distance. We have not proposed a footpath connection to Elm Street for two reasons: 1) We do not want to encourage general public use of the site as a bypass of the intersection of Parker Road and Elm Street, and 2) we want to focus pedestrian activity between the facilities and the visitor parking area.

The proposed building and site design is similar to many of the surrounding multi-family residential developments. The buildings have been designed to resemble a small multi-family development, looking and feeling like a home to residents, visitors, and neighbors. Regarding site design, we have proposed a “centrally” located parking area, with the primary entry points for both buildings focused on the visitor parking area. Also, the shared courtyard is located between the two buildings, situated away from the public road and screened from neighboring properties using fencing and possibly buffer landscaping.

D. The proposed use shall be in keeping with the goals and policies of the Sumner Comprehensive Plan.

This proposal follows many of the goals and policies in the Sumner Comprehensive Plan, detailed as follows:

Economic Development Element: The Plan encourages a variety of businesses in the City. Memory Haven of Sumner is another new business opportunity, providing a needed service for the City and surrounding communities focusing on dementia care. The proposal is very compatible with surrounding residential uses, being a mixture of single- and multi-family housing. Finally, the Plan encourages small business establishment and growth in the City. This proposal will employ at least 20 staff members, having a staff of eight (8) during the day and evening shifts, and four (4) overnight. It will also be served by various product and material deliveries, supporting other businesses in the area.

Community Character Element: The Plan identifies the intersection of Elm Street and Parker Road as a Neighborhood Center. This project site, being on the southeast corner of said intersection, may serve as an anchor for the Neighborhood Center. Currently vacant land, this proposal will provide a new amenity for the neighborhood and increase the viability and attractiveness of the area. Native plantings will be utilized in the landscape design, and the building design is intended to make the project look and feel like it belongs in the community.

Housing Element: This project will help preserve the existing residential neighborhood, providing much-needed street improvements along the site frontage and extending existing stormwater infrastructure to adjacent properties. It also satisfies the Plan’s goal to provide housing for “all life stages and economic segments of the Sumner community.” Energy efficiency will also be utilized and encouraged through the design process.

Family and Human Services Element: The Plan encourages support of “human service programs that focus on... education, and families.” Care for the elderly, especially those

with dementia, is very difficult on families. This proposal will provide a much-needed service to the community, and provide a peaceful setting for its residents and peace of mind for their families.

E. All measures have been taken to minimize the possible adverse impacts which the proposed use may have on the area in which it is located.

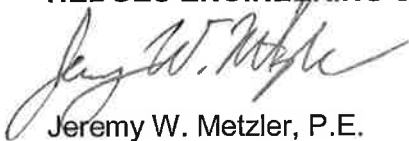
The proposed dementia care residence facility is being designed to resemble other residential structures in the area. Our goal is to provide an assisted living facility that looks and feels like home, not a clinic, hospital, or critical care facility. The proposal contains a pair of single-story structures perpendicular to one another with large overhangs and pitched roof planes, featuring a porch at each building's main entry. A secure fenced courtyard is proposed between the buildings, which will not be visible from either street frontage and will be screened from adjacent residential properties. The proposed Low Impact Stormwater Facilities will blend into the surrounding landscaping and be well vegetated and maintained.

Furthermore, while it would be much more cost effective to build only one larger building, that would not be in the best interest of those afflicted with dementia, nor the surrounding community. Smaller home-like environments allow the residents to live and prosper much more than an institutional environment. By providing two structures, several features are duplicated, such as the kitchen, laundry, bathroom, and HVAC facilities, etc. This makes the overall site design is more costly, but more livable and allows residents to thrive. Any and all of the specific design details will be addressed through the Design Review process.

If you have any questions, comments, or require more information prior to our meeting, I can be reached by phone at (253) 891-9365, or via email at jeremym@hedgesengineering.com. We look forward to your positive review of this application, and the subsequent review and consideration of our request by the Hearing Examiner.

Sincerely,

HEDGES ENGINEERING & CONSULTING, INC.



Jeremy W. Metzler, P.E.
Project Engineer

Attachments: CUP Application
Conceptual Site Plan (5 copies 11"x17", 1 copy 24"x36")
Conceptual Floor Plan (5 copies 11"x17", 1 copy 24"x36")
Mailing Labels for all property owners within 500 feet of project (2 copies)
Permit Fee - \$1,100.00

cc: Project File (2010.34-49), Marvin E. Rogers, John B. Merz, Henry L. Hayes

