

# 1 INTRODUCTION AND PLANNING PROCESS

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## 1.1 Purpose

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The purpose of the Phelps County Hazard Mitigation Plan is to substantially and permanently reduce the county's vulnerability to natural hazards. The plan is intended to promote sound public policy designed to protect citizens, critical facilities, infrastructure, private property and the natural environment. This can be achieved by increasing public awareness, documenting resources for risk reduction and loss-prevention, and identifying activities to guide the community towards the development of a safer, more sustainable community.

In an effort to ensure the purpose of the Phelps County Hazard Mitigation Plan is fulfilled, the participants in the development of this plan defined and established a list of goals which are directly relevant to meeting the purpose of the plan. The following is a list of the goals identified by the participants of this plan:

1. Reduce risks and vulnerabilities of people in hazard-prone areas through current technology, better planning and hazard mitigation activities.
2. Reduce the potential impact of natural disasters on new and existing properties and infrastructure and the local economy.
3. Promote education, outreach, research and development programs to improve the knowledge and awareness among the citizens and industry about hazards they may face, their vulnerability to identified hazards, and hazard mitigation alternatives that can reduce their vulnerabilities.
4. Strengthen communication and coordinate participation between public agencies, citizens, non-profit organizations, business, and industry to create a widespread interest in mitigation.
5. Establish priorities for reducing risks to the people and their property with emphasis on long-term and maximum benefits to the public rather than short-term benefit of special interests.
6. Secure resources for investment in hazard mitigation.

This plan was also developed to make Phelps County and participating jurisdictions eligible for certain federal disaster assistance. Those programs include the Federal Emergency Management Agency's (FEMA) Hazard Mitigation Grant Program, Pre-Disaster Mitigation Program and Flood Mitigation Assistance Program.

## 1.2 Background and Scope

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Each year natural disasters take the lives of hundreds of people and injure thousands more in the United States alone. Nationwide, taxpayers pay billions of dollars annually to help communities, organizations, businesses and individuals recover from disasters. Taxpayer dollars only partially reflect the total cost of disasters. Insurance companies and non-governmental organizations that

respond to disasters and/or assist with recovery also contribute enormous sums of money in the wake of natural disasters. Many of these events are predictable and loss of life and property damage could be reduced or eliminated with proper planning and preparation.

Hazard mitigation is defined by FEMA as “any sustained action taken to reduce or eliminate long-term risk to human life and property from a hazard event.” The results of a three-year congressionally mandated independent study to assess future savings from mitigation activities provides evidence that mitigation activities are highly cost-effective. On average, each dollar spent on mitigation saves society an average of \$4 in avoided future losses in addition to saving lives and preventing injuries (National Institute of Building Science Multi-Hazard Mitigation Council, 2005).

Hazard mitigation planning is the process through which hazards that threaten communities are identified, likely impacts of those hazards are determined, mitigation goals are set and appropriate strategies to lessen impacts are determined, prioritized and implemented. This plan documents Phelps County’s hazard mitigation planning process and identifies relevant hazards, vulnerabilities and strategies the County and participating jurisdictions will use to decrease vulnerability and increase resiliency and sustainability in Phelps County.

This multi-jurisdictional plan complies with SEMA’s and FEMA’s planning guidance; Fema regulations, rules, guidelines and checklists; the Code of Federal Regulations; and existing federal and state laws; and such other reasonable criterion as the President, Governor, federal and state congresses and SEMA and FEMA may establish in consultation with local governments while the plan is being developed. This plan also meets the minimum planning requirements for all FEMA mitigation programs, such as the Flood Mitigation Assistance (FMA) Program, the Pre-Disaster Mitigation (PDM) Program, the Hazard Mitigation Grant Program (HMGP), and where appropriate, other FEMA mitigation related programs such as the National Earthquake Hazards Reduction Program (NEHRP), the National Flood Insurance Program (NFIP) and the Community Rating System (CRS).

The Phelps County Multi-Hazard Mitigation Plan is a multi-jurisdictional plan that covers the participating jurisdictions within the County’s borders, including the following:

- Phelps County
- Phelps County Health Department
- City of Doolittle
- City of Edgar Springs
- City of Newburg
- City of Rolla
- City of St. James

Jurisdictions added in the 2009 revision:

- St. James R-I School District
- Newburg R-II School District
- Phelps County R-III School District (Edgar Springs)
- Rolla 31 School District

The information and guidance in this plan document will be used to help guide and coordinate mitigation activities and decisions for local jurisdictions and organizations. Proactive mitigation planning will help reduce the cost of disaster response and recover to local communities and residents by protecting critical infrastructure, reducing liability exposure and minimizing overall community impacts and disruptions. Phelps County has been affected by natural disasters in the past and participating jurisdictions and organizations are committed to reducing the impacts of future incidents and becoming eligible for hazard mitigation-related funding opportunities.

### 1.3 Plan Organization

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The Phelps County Hazard Mitigation Plan has been prepared according to the requirements of the Disaster Mitigation Act of 2000, which emphasized the need for a more coordinated approach to mitigation planning and implementation. Furthermore, the plan has been developed and organized within the rules and regulations established under the 44 CFR 201.6, published in the *Federal Register* on February 26, 2002 and finalized on October 31, 2007. The regulations established the requirements that local hazard mitigation plans must meet in order to fulfill the eligibility requirements for local jurisdictions to apply for certain federal disaster assistance and hazard mitigation funding under the Robert T. Stafford Disaster Relief and Emergency Act.

The plan contains a mitigation action listing, a discussion of the purpose and methodology used to develop the plan, a profile on Phelps County, as well as the hazard identification and vulnerability assessment of natural hazards. In addition, the plan offers a discussion of the community's current capability to implement the goals, objectives and strategies identified here in. The plan is organized as follows:

- Executive Summary
- Prerequisites
- Chapter 1: Introduction and Planning Process
- Chapter 2: Planning Area Profile and Capabilities
- Chapter 3: Risk Assessment
- Chapter 4: Mitigation Strategy
- Chapter 5: Plan Implementation and Maintenance
- Appendices

To assist in the explanation of the above identified contents, there are several appendices included which provide more detail on specific subjects. This plan is intended to improve the ability of Phelps County and the jurisdictions within to handle disasters and will document valuable local knowledge on the most efficient and effective ways to reduce loss.

### 1.4 Planning Process

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44 CFR Requirement 201.6(c)(1): [The plan shall document] the planning process used to develop the plan, including how it was prepared, who was involved in the process and how the public was involved.

Phelps County's hazard mitigation plan was originally developed by the Meramec Regional Planning Commission. MRPC formed a planning committee comprised of representatives from each of Phelps County's cities, city and rural fire departments, police departments, the county health department, local businesses, the county hospital, utility companies, the American Red Cross, and the University of Missouri-Rolla, not-for-profits and school districts. This cross section of local representatives was chosen for their experience and expertise in emergency planning and community planning for Phelps County.

Meramec Regional Planning Commission's Environmental Programs Department served as project manager for the Phelps County Hazard Mitigation Plan when the 2004 plan was developed. Four planning committee meetings were held over three months to develop ideas for hazard mitigation in Phelps County. All meetings were advertised on MRPC's website and at the MRPC office in St. James. The meetings were held at the Phelps County Courthouse. Agendas, minutes and sign in sheets from each meeting can be accessed at the Meramec Regional Planning Commission, 4 Industrial Drive in St. James, Missouri.

In accordance with Missouri's "sunshine law" (RSMo 610.010, 610.020, 610.023, and 610.024), the public was notified each time the plan, or sections of the plan, was presented for review. Input from each public official (city and county) was solicited by mailing an explanatory letter and a copy of the particular draft. All planning committee members were given a draft of each section as it became available. Members of the planning committee then reviewed the plan drafts and provided valuable input to MRPC staff. The planning committee performed a needs assessment, developed goals, objectives and recommendations and prioritized mitigation projects. Additionally, MRPC contacted many employees of the county and its cities to gain needed information concerning city services, plans and capabilities. Drafts were made available to any interested citizen.

MRPC staff sought public input at each of the planning committee meetings by posting notices in local media. Staff also conducted a radio call-in program and discussed the county's developing mitigation plan. SEMA staff participated in the local radio call-in show and helped explain the state's mitigation programs. Drafts of the Phelps County Hazard Mitigation Plan were also available for download and review from MRPC's website.

#### **1.4.1 Multi-Jurisdictional Participation**

44 CFR Requirement 201.6 (a) (3): Multi-jurisdictional plans may be accepted, as appropriate, as long as each jurisdiction has participated in the process and has officially adopted the plan.

During the original planning process in 2004, Phelps County invited incorporated cities, school districts, emergency response agencies, utility companies and not-for-profits to participate in the hazard mitigation planning process:

- Dan Babcock, Phelps/Pulaski American Red Cross Chapter
- Mike Byington, Phelps County Health Department
- Vicki Cason, Rolla Municipal Utilities
- Joe Council, Phelps County Disaster Committee

- Don Ertle, Emergency Management Director of Newburg, Jerome, Doolittle
- Steve Hargis, Rolla Public Works Department
- Gary Heavin, Rolla Public Works Department
- Doug James, City of Rolla Emergency Operations Center
- Viola Johnson, Edgar Springs Rural Fire Department Secretary
- Scott Jones, City of Newburg Police Chief
- Deborah Rhodes, Phelps County Health Department
- Steve Nelson, University of Missouri Rolla
- A.C. O'Neal, Phelps County Regional Medical Center
- Bruce Parton, St. James Fire Department/EMD
- Larry Seest, City of Rolla Fire Department
- Bruce Southard, Phelps County Emergency Management Director
- Andy Sutton, Edgar Springs Rural Fire Department Captain
- Carl Warnol, City of Rolla Fire Department
- Robert Williams, City of Rolla Fire Chief

During the 2009 Update and Revision, Phelps County invited incorporated cities, school districts, emergency response agencies, utility companies and not-for-profits to participate in the hazard mitigation planning process:

- Randy Verkamp, Presiding Commissioner, Phelps County
- Bud Dean, Associate Commissioner, Phelps County
- Larry Stratman, Associate Commissioner, Phelps County
- Don Blankenship, Sheriff, Phelps County
- Bruce Southard, Phelps County EMD, Phelps County
- William S. Jenks, III, City of Rolla Mayor
- John Butz, City of Rolla Administrator
- John Petersen, City of Rolla Community Development Director
- Mark Kearse, City of Rolla Chief of Police
- Robert Williams, City of Rolla Fire Chief
- Steve Hargis, City of Rolla Public Works Director
- Dan Watkins, City of Rolla Municipal Utilities GM
- Ken Kwantes, City of Rolla Parks & Recreation Director
- Brady Wilson, City of Rolla Director of Sanitation
- Rick Williams, City of Rolla EMD
- Paul Smith, City of Doolittle Mayor
- William Jones, City of Doolittle Police Chief
- David Schmickle, City of Doolittle Superintendent
- Kurt Ross, City of Edgar Springs Mayor Pro Tim
- John School, City of Edgar Springs Chief of Police
- Everett Perkins, City of Edgar Springs, Superintendent
- Andy Mattison, City of Newburg Mayor
- Eric Thornson, City of Newburg Police Chief
- James Poucher, City of Newburg Fire Chief

- David Simpson, City of Newburg Water/Sewer Superintendent
- David Wright, City of Newburg Electric Superintendent
- Danny Hamilton, City of Newburg Street Superintendent
- Don Ertle, City of Newburg EMD
- Dennis Wilson, City of St. James Mayor
- Kevin Friend, City of St. James Police Chief
- Bruce Parton, City of St. James Fire Chief/EMD
- Mike Licklider, City of St. James Utilities Superintendent
- Larry Wycoff, City of St. James Utilities Engineer
- John Edgar, City of St. James Street Supervisor
- JR Marcus, City of St. James Parks & Recreation Director
- Joy Tucker, St. James R-I School District
- Michael Bumgarner, Newburg R-II School District
- Kay McMurtrey, Phelps County R-III School District
- Dr. Jerry Giger, Rolla 31 School District
- Larry Merry, Ameren UE
- Tom Werdenhouse, Three Rivers Electric Cooperative
- Dwayne Cartwright, Intercounty Electric Cooperative
- Gary Fulks, Sho-Me Power Cooperative
- John Greenlee, Gascoage Electric Cooperative
- Dan Blesi, Crawford Electric Cooperative
- Fidelity Communications
- Charter Cable
- Todd Preston, Verizon Wireless
- Chris Mueller, Centurytel
- Edna Bridges, American Red Cross
- Wade Jadwin, Missouri Science & Technology
- Denise Whitehead, Webster University/Rolla Metro Campus
- Jana Neiss, Drury University
- Karla Lindeman, Metro Business College
- Dr. Edward Jackson, East Central College
- Dr. Gregory Stratman, Columbia College
- Debbie Hallinar, Phelps County Regional Medical Center
- Patty Faenger, Missouri Veterans Home
- Cedar Knoll Home
- County Valley Home
- Ferndale, Inc
- Heritage Park Skilled Care
- Parkside Assisted Living
- Presbyterian Manor
- Rolla Manor Care
- Rosewood Residential Care
- St. James Nursing Center
- Vince Hillyer, Boys & Girls Town of Missouri

- Missouri State Highway Patrol
- Jeff Faulkner
- All Star Gas
- Poe's Gas
- Leo Pelek, Ferrellgas
- Linda Hanrahan, St. James Ambulance
- Forest Supervisors Office, Mark Twain National Forest
- Carol Mahan, Missouri Department of Conservation
- Tom Stehn, Missouri Department of Transportation
- Pat Neuman, Missouri Department of Transportation
- Dr. Brad Frazier, Wal-mart Distribution Center
- David Wallen, Missouri Pipeline & Missouri Gas
- SFC Paul Sorrell, Missouri National Guard Amory

The Disaster Mitigation Act requires that each jurisdiction either participate directly in the planning process or authorize another entity to represent them in the planning process. There were a number of criteria for participation including the following:

- Providing a representative to serve on the planning committee;
- Participating in at least one of two or more meetings of the planning committee, either by direct representation or through authorized representation;
- Providing data for plan development;
- Identifying goals and mitigation actions for the plan;
- Prioritizing mitigation actions/projects for the plan;
- Reviewing and commenting on the draft plan document;
- Informing the public, local officials and other interested parties about the planning process and providing opportunities for them to comment on the plan;
- Formally adopting the plan

The jurisdictions that participated in the process, as well as their level of participation in the process are shown in Table 1.1. Documentation of meetings, including sign-in sheets are included in Appendix A: Planning Process Documentation.

#### **1.4.2 The Planning Process**

Phelps County and MRPC worked together to develop the plan and based the planning process on FEMA's Local Multi-Hazard Mitigation Planning Guidance (2008), the State and Local Mitigation Planning How-To Guides (2001) and the *Multi-Jurisdictional Mitigation Planning (2006)*. The planning process has included organizing the county's resources, assessing the risks to the county, developing the mitigation plan and implementing the plan and monitoring the progress of plan implementation.

The planning process formally began with the initial meeting being held in conjunction with the Phelps County Commission meeting on November 18, 2008. MRPC mailed out letters of invitation to all of the jurisdictions listed above. MRPC's invitations were mailed out to

representatives of each of Phelps County’s cities, city and rural fire departments, ambulance districts, police departments, the county health department, colleges and universities, local businesses, utility companies and the American Red Cross. This cross section of local representatives was chosen for their experience and expertise in emergency planning and community planning for Phelps County. The mailing list is included in Appendix A: Planning Process Documentation. In some cases jurisdictions desired to participate in the planning process but were not able to attend planning meetings. In order to insure that these jurisdictions would be considered part of the plan, MRPC followed the planning guidance provided by FEMA and provided Authorizing Resolutions to those jurisdictions for review and adoption. Copies of the Authorizing Resolutions are included in Appendix A. Those jurisdiction still participated by providing information and reviewing the plan document, but did not have adequate staff to attend planning meetings.

All planning committee members were provided drafts of sections of the plan as they became available. Members of the planning committee then reviewed the plan drafts and provided valuable input to MRPC staff. The planning committee performed a needs assessment, developed goals, objectives and recommendations and prioritized mitigation projects. Additionally, MRPC staff contacted several employees of the county and city governments to gain needed information concerning city services, plans and capabilities.

Phelps County assisted in the planning process by issuing public notice of the planning meetings as well as by providing facilities for the meetings. County officials, including commissioners and the County Clerk attended and participated in the meetings.

The planning committee contributed to the planning process by:

- attending and participating in meetings
- collecting data for the plan
- making decisions on plan content
- reviewing drafts of the plan document
- developing a list of needs
- prioritizing needs and potential mitigation projects
- assisting with public participation and plan adoption

Table 1.1 shows the meeting dates as well as agenda items for each of the meetings.

**Table 1.1 Phelps County Hazard Mitigation Planning Meetings**

Meeting	Topics Covered	Date
Phelps County Hazard Mitigation Planning Committee	Initial meeting: Welcome & introductions, review of plan update requirements, review of current plan, discussion of goals & objectives & progress made in 5 years, discussion of possible changes to goals and objectives	November 18, 2008

Meeting	Topics Covered	Date
Phelps County Hazard Mitigation Planning Committee	Welcome & introductions, review of action items, review of current plan, discussion of goals & objectives & progress made in 5 years, discussion of possible changes to goals & objectives	December 11, 2008
Phelps County Hazard Mitigation Planning Committee	Welcome & introductions, review of action items, review of plan, discussion of goals& objectives & progress made in 5 years, discussion of possible changes to goals & objectives	January 8, 2009

The following individuals, by jurisdiction or organization, were in attendance at the November 18, 2008 meeting of the Phelps County HMPC:

James Remillard, Missouri State Highway Patrol, Troop I  
Gary Heavin, City of Rolla  
Larry Wycoff, City of St. James  
Scott Grahl, City of Rolla  
Rick Williams, City of Rolla Police Department  
Vicki Cason, Rolla Municipal Utilities  
Victoria Woods, Missouri Department of Transportation  
Larry Stratman, Phelps County Associate Commissioner  
Randy Verkamp, Phelps County Presiding Commissioner  
Charles “Bud” Dean, Phelps County Associate Commissioner  
Carol Bennett, Phelps County Clerk  
Andy Mattison, Mayor of City of Newburg  
Tamara Snodgrass, Meramec Regional Planning Commission  
Tonya Price, Meramec Regional Planning Commission

Those individuals , by jurisdiction or organization, who participated in the second planning meeting of the Phelps County HMPC, held on December 11, 2008 included:

Larry Wycoff, City of St. James  
Vicki Cason, Rolla Municipal Utilities  
Gary Heavin, City of Rolla  
Scott Grahl, City of Rolla  
K.C. Kotyk, Rolla Daily News  
Charles “Bud” Dean, Phelps County Associate Commissioner  
Randy Verkamp, Phelps County Presiding Commissioner  
Larry Stratman, Phelps County Associate Commissioner  
Tamara Snodgrass, Meramec Regional Planning Commission  
Tonya Price, Meramec Regional Planning Commission

Those individuals, by jurisdiction or organization, who participated in the third planning meeting of the Phelps County HMPC, held on January 8, 2009 included:

Gary Heavin, City of Rolla  
 Scott Grahl, City of Rolla  
 Vicki Cason, Rolla Municipal Utilities  
 Ron Smith, City of Rolla Fire Department  
 Tamara Snodgrass, Meramec Regional Planning Commission  
 Tonya Price, Meramec Regional Planning Commission

Table 1.2 shows the entities involved in the planning process and how they participated. All of these entities, as well as jurisdictions located in neighboring counties, were asked to review the draft plan and provide input into the document.

**Table 1.2 Participation in Phelps County Hazard Mitigation Planning Meetings**

Jurisdiction	Participating Jurisdiction	Participated in Planning Process	HMPC Nov 18, 2009 Meeting	HMPC Dec 11, 2008 Meeting	HMPC Jan 8, 2009 Meeting	Signed Authorized Representative Resolution	Completed Surveys/ Provided Information
Phelps County	X		X	X			X
City of Doolittle	X						X
City of Edgar Springs	X						X
City of Newburg	X		X				X
City of Rolla	X		X	X	X		X
City of St. James	X		X	X			X
St. James R-I School District	X					X	X
Newburg R-II School District	X					X	X
Phelps County R-III School District	X					X	X
Rolla 31 School District	X					X	X
Missouri Highway Patrol Troop I		X	X				
Missouri Department of Transportation		X	X				
Rolla Daily News		X		X			

Even if a jurisdiction submitted an Authorizing Resolution, in order to be considered a participating jurisdiction, they were still required to provide information for the plan either by completing surveys or responding to direct requests for data. In addition, all participating jurisdictions were asked to review the final draft plan, including goals and action items, and

provide input to the HMPC. Those individuals who provided information for the plan, and the jurisdictions they represent, are listed in Table 1.3 below.

**Table 1.3 Names of Participants Providing Data for Phelps County Plan**

Name	Jurisdiction	Completed Survey	Provided Information
Carol Bennett, County Clerk	Phelps County		X
Randy Verkamp, Presiding Commissioner	Phelps County		X
Charles "Bud" Dean, Associate Commissioner	Phelps County		X
Larry Stratman, Associate Commissioner	Phelps County		X
Kevin Rasmussen, County Assessor	Phelps County		X
Ann Wolfe, Clerk	City of Doolittle	X	X
Dennis Hale, Clerk	City of Edgar Springs		X
Phyllis Harris, Clerk	City of Newburg		X
Carol Daniels, Clerk	City of Rolla	X	X
Marilyn Woolsey, Clerk	City of St. James	X	X
Joy Tucker, Supt.	St. James R-I School District		X
John Westerman, Supt.	Newburg R-II School District		X
Kay McMurtrey, Supt.	Phelps County R-III School District		
Dr. Jerry Giger, Supt.	Rolla 31 School District		X

### 1.4.3 Public Participation in the Planning Process

44 CFR Requirement 201.6 (b): An open public involvement process is essential to the development of an effective plan. In order to develop a more comprehensive approach to reducing the effects of natural disasters, the planning process shall include: (1) An opportunity for the public to comment on the plan during the drafting stage and prior to plan approval.

The development of this plan has involved the public throughout. All meetings were publicized in accordance with Missouri's Sunshine Law (RSMo 610.010, 610.020, 610.023 and 610.024) the public was notified each time the plan, or sections of the plan, was presented for review and discussion. Input from each public official of city, county and school district, as well as surrounding jurisdictions, was solicited by mailing a postcard and directions to the MRPC website located at [www.meramecregion.org](http://www.meramecregion.org) as well as the City of Rolla website at [www.rollacity.org](http://www.rollacity.org) where a copy of the draft plan could be viewed or downloaded.

In addition Phelps County is dedicated to the continued involvement of the public during the bi-annual review and the five-year update, as well as, in the interim. Phelps County and its

encompassing jurisdictions have established strategies herein which will provide opportunity for continued public involvement. These strategies include a copy of the adopted plan to be placed at the Phelps County Courthouse and the city hall or municipal building of each jurisdiction for public review. In addition, a copy of the plan and any proposed revisions will be displayed on the county-sponsored website with a phone number for the public to direct questions or comments regarding the plan to the emergency management director.

#### **1.4.4 Coordination with Other Departments/Agencies/Jurisdictions**

44 CFR Requirement 201.6 (b): An open public involvement process is essential to the development of an effective plan. In order to develop a more comprehensive approach to reducing the effects of natural disasters, the planning process shall include: (2) An opportunity for neighboring communities, local and regional agencies involved in hazard mitigation activities and agencies that have the authority to regulate development, as well as businesses, academia and other private and non-profit interests to be involved in the planning process. (3) Review and incorporation, if appropriate, of existing plans, studies, reports and technical information.

There are several organizations that have a presence in Phelps County whose purpose and goals coincide with hazard mitigation. In order to insure that those agencies were included in the hazard mitigation planning process they were invited to participate in the planning committee. The organizations that chose to participate in the planning process are listed in 1.4.2. The complete mailing list is included in Appendix A: Planning Process Documentation.

Planning meetings and the planning process were announced through press releases and public notices in accordance with Missouri's Sunshine Law (RSMo 610.010, 610.020, 610.023 and 610.024). Press releases were distributed throughout the eight-county Meramec region. The public was notified each time the plan, or sections of the plan were presented for review. Input from each public official (city and county) was solicited by mailing an explanatory letter and copy of the particular draft. All planning committee members were given a draft of each section as it became available. Additionally, MRPC staff contacted many employees of the county, its cities and other organizations to gain needed information concerning services, plans and capabilities. Drafts of the plan were made available to any interested citizen either in hard copy or via download from the MRPC website. Postcards were mailed out to neighboring jurisdictions inviting them to review the plan and provide input and notifying them of where to view copies of the document. A listing of those jurisdictions that received postcards is included in Appendix A.

MRPC staff contacted jurisdictions as well as the planning committee to insure that all applicable plans, studies, reports and technical information were identified and made available for review and comparison with the draft plan. A list of these documents can be found in Section 2.2.