

## **Introduction**

According to Wisconsin's Comprehensive Planning Law, the purpose of the Economic Development Element is to promote the stabilization, retention, and expansion of the economic base, and quality employment opportunities. To address this requirement, the Economic Development chapter includes:

- Highlights of the labor force information from *Chapter 3: Community Profile*;
- An assessment of strengths and weaknesses with respect to attracting and retaining business and industry;
- An overview of programs that deal with environmentally contaminated sites for commercial or industrial uses; and
- A list of agencies (and website information) providing economic development programs at the county, regional, state and federal levels.

In terms of the 14 state comprehensive planning goals, those listed below relate specifically to planning for economic development:

- Promotion of the redevelopment of lands with existing infrastructure and public services and the maintenance and rehabilitation of existing residential, commercial, and industrial structures.
- Encouragement of land uses, densities, and regulations that promote efficient development patterns and relatively low municipal, state governmental, and utility costs.
- Encouragement of coordination and cooperation among nearby units of government.
- Building of community identity by revitalizing main streets and enforcing design standards.
- Providing adequate infrastructure and public services and an adequate supply of developable land to meet existing and future market demand for residential, commercial, and industrial uses.
- Promoting the expansion or stabilization of the current economic base and the creation of a range of employment opportunities at the state, regional, and local levels.

### **Economic Development Vision**

In 2030, the Town supports an economy based upon local services and agricultural uses with limited commercial development. Development that has occurred has done so in harmony with the Town's natural and agricultural landscape and caters primarily to local landowners and farmers.

## **Visions, Objectives, Policies, and Goals**

Wisconsin's Comprehensive Planning Law requires that the Economic Development Element contain a compilation of objectives, policies, goals, maps, and programs to promote the stabilization, retention, or expansion, of the economic base and quality employment opportunities in the local

governmental unit, including an analysis of the labor force and economic base of the local governmental unit. The element shall assess categories of particular types of new businesses and industries that are desired by the local governmental unit. The element shall assess the local governmental unit's strengths and weaknesses with respect to attracting and retaining businesses and industries, and shall designate an adequate number of sites for such businesses and industries. The element shall also evaluate and promote the use of environmentally contaminated sites for commercial or industrial uses. The element shall also identify county, regional, and state economic development programs that apply to the local governmental unit.

## Local Economic Development Desires

Each community has a different vision for future economic development. Clearfield, like many other rural townships, has emphasized a quality residential setting, preserving natural resources, and sustaining remaining agricultural operations rather than expanding business and industry. Ideas and comments collected during the 2001 Town of Clearfield Zoning Survey provided much of the background information necessary to identify future economic development goals in Clearfield.

### Local Visions for Economic Development

Relatively few residents support a substantial increase in future commercial and industrial development in the Town. Instead, the general opinion was that future economic development in Clearfield should be done in harmony with the rural, agriculture-oriented landscape of the community. Nature-based eco-tourism and agri-tourism may be desirable economic development alternatives. Others may include farm supply, resident and visitor services, and home-based businesses.

## Labor Force and Economic Base

*Chapter 1: Issues & Opportunities* provides a detailed analysis of Clearfield and Juneau County's economy and labor force. Highlights from that chapter include:

- **Local workers are mobile.** Residents take advantage of convenient access to I-90/94, STH 58, STH 80, STH 21 and HWY 12/16 to commute to nearby employment centers.
- **Income.** Median household income in the Township is on par with that of surrounding communities and is growing.
- **Occupational Types.** While the Town of Clearfield has a relatively diverse working population including professionals, sales people, construction workers and farmers, the Census reveals that the highest employed occupations are in the manufacturing, retail trade, and tourism.
- **Educational Attainment.** Clearfield residents are becoming more highly educated, with 31.3% of the population receiving some level of college education.

## Current Business Inventory and Business Environment

The current business inventory in Clearfield is small and focused primarily on farming and local services. To understand the business environment of a community, it is helpful to classify the local economy. In small towns there are generally five types of economies<sup>1</sup>:

1. **Resource-Based Economy.** This type of economy is characterized by geographic isolation, as they are typically far away from larger cities / metro areas and have limited interstate access. These communities often have an aging population base and lack of opportunities for higher education and local employment.
2. **Industrial Economy.** This type of economy is characterized by dependence on yesterday's economic base. Often a community of this type has a single manufacturing or industrial operation that sustains the vast majority of residents.
3. **Metropolitanizing Economy.** These communities are experiencing a high amount of residential development which causes concern about decreasing land supplies, loss of community identity, maintaining small town character, and avoiding becoming a "bedroom community."
4. **Dependent Economy.** Usually an unincorporated (i.e. township) area outside of the suburban ring of development. The economic vitality of this community depends on the economic success of the larger adjacent/nearby community (i.e. La Crosse, Madison). The primary challenge is handling local residential development pressure.
5. **Lifestyle Economy.** These communities include university towns, small communities with military bases, and tourist destinations. Residents enjoy their small community setting and quality of living, but are concerned about their long-term dependency on a single economic source. In the case of Clearfield, participants expressed concern about residential development in the form of second homes and time-shares for people who reside outside of the community.

Based on these descriptions, the Town of Clearfield is best described as a combination of a resource-based and dependent economy shifting towards dependent in the coming decades. The majority of the Town's non-farming residents work in nearby cities where they also find shopping, entertainment, healthcare, and other services.

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<sup>1</sup> Randall Gross, Embracing Change in Small Communities, APA National Conference, March 2005.

## **Costs and Benefits of Economic Development**

The Town of Clearfield has several positive attributes desirable to potential businesses:

- A location that has traffic flowing through it from north and south along STH 58, STH 80, I90/94, HWY 12/16 and STH 21.
- An attractive and safe community atmosphere that provides for a high quality of living.
- Quality school districts serving the area.
- Reasonable tax rates.
- Access to recreational areas, open space, and water.

While the Town of Clearfield enjoys the advantages identified above, there are several challenges that must be addressed in attracting new businesses and industry, including:

- Residents can easily drive to nearby cities to purchase services and products;
- Similarly, many residents travel outside of the Town to work and find shopping, dining and entertainment choices;
- There is a lack of businesses catering to people's everyday needs that further entices residents to shop outside the community for basic needs.
- Competition from existing development centers limits the market area for businesses in Clearfield.
- Although seasonal residence will likely increase during the next twenty years, limited primary or year-round population growth is projected for Clearfield (refer to Table 2 in *Chapter 1: Issues & Opportunities*). This projected limited growth will result in the market base remaining about the same size over the planning period. This in turn will limit the growth potential of existing businesses and the market demand for additional businesses as most will require a year-round customer base to remain profitable.
- Opposition to development from current landowners who may perceive commercial development as a threat to the Town's rural character and quality of living.

## **Economic Development Opportunities**

This section highlights some of the economic development opportunities available to Clearfield. Supporting goals, objectives and policies are provided at the end of the chapter to help Clearfield capitalize on its most desired economic opportunities.

### **Agriculture and Economic Development**

A depressed farm economy and growing pressure from nonfarm development may lead to increasing conflicts over the use of agricultural lands. Central to this conflict is the demand for rural housing and recreational land, which has resulted in accelerated rates of farmland conversion to nonfarm uses. In fact, nonfarm growth pressures led to Wisconsin passing the Comprehensive

Planning Law in 1999 to encourage communities to write and use comprehensive plans to guide land use decisions.

### **Strategies to Preserve Agriculture**

The *Agricultural, Natural and Cultural Resources* chapter highlighted several strategies for sustaining agriculture in the Town over the next 20 years and beyond. Given the importance of agriculture to the local economy, this section offers some additional opportunities available to local farmers.

- Sell products directly to customers at a centralized farmer's market. Possible locations for a new farmers market within Clearfield are identified on the Future Land Use Map later in this plan.
- Develop a historical and/or niche farm tour to showcase local farm operations and farm products. This tour could be included on the Clearfield and Juneau County Visitor's Bureau web sites as well as in a brochure available from the Visitor's Bureau.
- Participate in seminars and training hosted by the UW-Extension to learn about tools available to farmers to accommodate development requests (i.e. transfer and purchase of development rights, zoning ordinance tools) and other opportunities (i.e. the sale of farm by-products for energy generation, organic farming opportunities, niche farming opportunities, etc.).
- Consider conversion to organic farming. Strong organic and specialty farm markets are proving very profitable. Since 1990, the organic food industry has grown 20% or more each year and now constitutes an almost \$8 billion industry. An opportunity exists to capitalize on this growing market.

### **Agriculture / Nature Related Tourism**

Two potential agricultural tourist markets exist in Clearfield:

1. Eco-Tourism. The Little Yellow River and proximity to Castle Rock Lake provide opportunities to bring nature enthusiasts to the area that could spend money in the community at local restaurants, the farmers market, and other businesses. (Please refer to *Chapter 3: Transportation* for more information on bike/trail route opportunities in Clearfield.)
2. Agri-Tourism. Opportunities exist to offer tourist activities related to area agriculture, including: farmer-for-a-day experiences, rural bed & breakfasts, roadside stands, horse boarding and trail riding, pick-your-own produce operations, corn mazes, pumpkin patches, cheese factories etc.

### **Locations for Future Business Development**

The Town of Clearfield administers its own zoning ordinance. The Future Land Use Map in *Chapter 8: Future Land Use* will identify areas ideally suited, and desired, for future economic development.

Once the Comprehensive Plan is approved and adopted the zoning Ordinance will be reviewed and, if necessary, revised in order to be consistent with the Plan.

### Brownfield Sites

Brownfield sites vary in size, location, age, and past use. A brownfield site can be a former corner gas station or an empty manufacturing plant. There are an estimated 10,000 brownfields across Wisconsin. These sites pose a number of problems for communities including:

- Neighborhood deterioration and community blight;
- Potential harm to human health and the environment;
- Reduced tax revenue and economic growth; and,
- Attraction for vandalism, open dumping and other illegal activity.

The United States Environmental Protection Agency (EPA) definition of a **brownfield site** is "With certain legal exclusions and additions, the term 'brownfield site' means real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant."

The term "brownfield" was first used to distinguish developed land from unused suburban and rural land, referred to as "greenfield" sites. The EPA, states, and municipalities believe that choosing brownfield redevelopment over greenfield development yields several benefits for communities and for commerce. Brownfield redevelopment encourages the cleanup of contaminated sites. This is the major goal of most modern environmental regulations. The fewer the number of contaminated sites, the less the cumulative impact to the environment. Another benefit of brownfield redevelopment is that it revitalizes urban areas (many brownfields are centrally located in urban areas). This leads to another perceived benefit -- the minimization of green space development. When brownfields are redeveloped or revitalized in urban areas, less farmland on the urban fringe is developed, maintaining green space and reducing the need for expanding infrastructure and utilities. Finally, when brownfields are redeveloped and new businesses begin operating, these properties return tax base and provide jobs. This is a major financial incentive for communities to develop and encourage programs for brownfield redevelopment.

Interested residents can search for properties in the Town of Clearfield that have been impacted by environmental contamination (and have been reported) through the WDNR Bureau for Remediation and Redevelopment Internet web site tracking available at: [www.dnr.state.wi.us/botw/welcome.do](http://www.dnr.state.wi.us/botw/welcome.do). This database tracks identified sites from first reporting through closure or no further action. Records are kept in perpetuity regardless of whether or not contamination was actually found, the size of the incidence, and whether or not the site has been cleaned.

Governments at all levels have recognized that brownfield redevelopment is an important issue. Numerous programs have been created to encourage brownfield redevelopment including grants, loans, and tax incentives. In the future, Clearfield should encourage landowners to pursue the clean up of all brownfield sites. Likewise, Clearfield will encourage environmentally friendly business development that is properly permitted and regulated to protect the area's natural environment,

particularly its groundwater resources. Clearfield may choose to grant density bonuses or setback waivers as an incentive to re-develop brownfield sites.

## **Economic Development Tools, Programs, and Partners**

### **Capital Improvements program (CIP)**

Through a Capital Improvements Program (CIP), communities are able to responsibly plan for future improvements. As is recommended in *Chapter 4: Utilities and Community Facilities*, Clearfield should consider developing a CIP to help plan for community improvements that can support existing local businesses and desirable new business opportunities. A CIP may be used to plan for road maintenance, vehicles, parks and recreation facilities, and Town facility improvements, among others

### **Internet Marketing**

An opportunity exists to develop and utilize the Town of Clearfield web site as a marketing tool to advertise desirable economic activities (i.e. home occupations, strong tourism market, and recreational opportunities). The web site could include information about available development sites. The web site could also provide information about the development approval process, including printable permit applications, meeting schedules and agendas. This will keep interested individuals abreast of upcoming Plan Commission and Town Board agenda items, including site plans and completed application forms for resident review.

### **Tax Increment Financing**

Tax Incremental Financing (TIF) allows communities to undertake a public project to stimulate beneficial development or redevelopment that would not otherwise occur. It is a mechanism for financing local economic development projects in underdeveloped and blighted areas. Taxes generated by the increased property values pay for land acquisition or needed public works.

Until recently, TIF has been an economic development tool available exclusively to cities and villages. However, the Wisconsin Law was changed to allow Towns to establish TIF districts to promote agricultural and forestry development. Towns are more restricted than cities and villages in the range of activities that may receive TIF benefit. The list of eligible activities for a Town TIF district includes<sup>2</sup>:

- Agriculture - animal and crop production and direct support activities.
- Tourism - camps, RV parks, campgrounds, dairy product stores and public golf courses.
- Forestry - including logging and direct support activities.

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<sup>2</sup> At least 75 percent of the area of a TIF in a Town must be used for one of the allowable activities.

- Manufacturing - defined as animal slaughtering and processing, wood product manufacturing, paper manufacturing, or ethyl alcohol manufacturing.
- Residential development - limited to sleeping quarters within a TIF district for employees who work for employers engaged in an eligible TIF project (cannot include hotels, motels or traditional homes).
- Retail development - Related to the sale of products as a result of allowed agriculture, forestry or manufacturing activities.

The boundary of a TIF may be amended one time. A Town TIF district can remain in existence until the earliest of the following:

- The Town has received aggregate incomes equal to the total project costs;
- 11 years after the last expenditure in the original plan is made;
- The Town Board dissolves the district by resolution (the Town is then liable for all costs); or,
- The Secretary of Revenue determines the tax increments have been used to pay ineligible costs.

#### **State Agencies/Programs**

- Wisconsin Department of Commerce – [www.commerce.state.wi.us](http://www.commerce.state.wi.us): This department is the state’s primary agency for delivery of integrated services to businesses.
- Wisconsin Department of Transportation – [www.dot.state.wi.us](http://www.dot.state.wi.us): The Office of Disadvantaged Business Enterprise Programs encourages firms owned by disadvantaged individuals to participate in all federal and state transportation facility contracts.
- Forward Wisconsin – [www.forwardwi.com](http://www.forwardwi.com): Forward Wisconsin markets outside Wisconsin to attract new businesses, jobs, and increase state economic activity.
- Department of Workforce Development – [www.dwd.state.wi.us](http://www.dwd.state.wi.us): This department builds and strengthens Wisconsin’s workforce by providing job services, training and employment assistance, and helping employers find necessary workers.
- Wisconsin Small Business Development Centers – [www.uwex.edu/sbdc](http://www.uwex.edu/sbdc): These centers help ensure the state’s economic health and stability. They offer formative business education, counseling, and technology training.

#### **How Does a TIF Work?**

1. The community defines a TIF district area.
2. Tax assessments for the district are frozen at their current value.
3. The community prepares a plan for the TIF district called a “project plan” to describe costs to be incurred and the anticipated tax revenue to make up for the cost overtime.
4. The community, through its tax-increment finance authority, can acquire land and make capital improvements in the district (i.e. streets, lighting, landscaping, etc.) to make it more desirable to developers.
5. When development occurs, the value of the land in the district increases. This increased value is taxed, but for a period of time while the TIF district is in effect, the additional tax revenues go to the TIF.
6. This additional tax revenue is used to pay off the expenses incurred by the community in land acquisition and installation of capital improvements.

More information about establishing a TIF is available in Wis. Stats. Ch. 66.1105(5)(g).

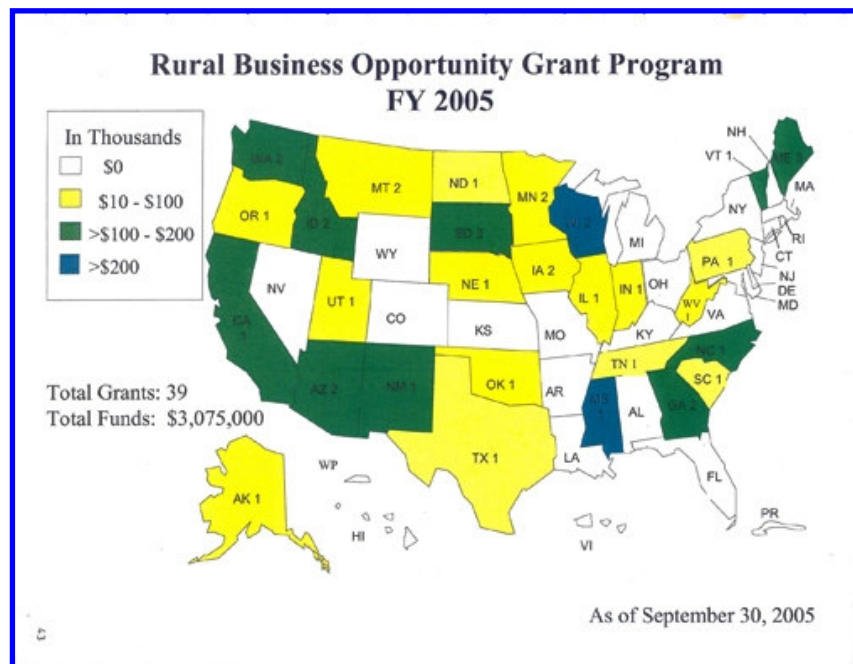


- Wisconsin Youth Apprenticeship Program - <http://uwhelp.wisconsin.edu/admission/requirements/freshman/wisyouthprog.asp>: helps businesses prepare future workers and is an integral part of the State Department of Workforce Development's workforce training strategy. Youth apprenticeship is a rigorous two-year elective program for high school juniors and seniors that combine academic and technical classroom instruction and on-the-job training from mentors.
- Dairy 2020 Initiative is a state, business, and education partnership that works to enhance the competitive edge of the Wisconsin dairy industry.
- Wisconsin Women's Business Initiative Corporation - [www.wwbic.com](http://www.wwbic.com): This statewide economic development organization offers quality business workshops and trainings, one-on-one business assistance, business incubation programs, a variety of micro loan programs and individual development accounts.

### Rural Business Opportunity Grants<sup>3</sup>

The Rural Business Grants program has made available \$1.5 million to help promote sustainable economic development in rural communities. The average grant size is expected to be no more than \$50,000. The grants make available money for economic planning, technical assistance for rural businesses, or training for rural entrepreneurs or economic development officials.

Eligible applicants include public bodies, nonprofit corporations, Indian tribes, or cooperatives with members that are primarily rural residents. Applicants must also possess “significant expertise” in the proposed activities as well as financial strength that will ensure the objectives of the proposed grant will be completed. The grant money must result in economic development of a rural area (any area other than a city or town with a population of greater than 50,000 and the urbanized area contiguous and adjacent to such a cities or towns). The project must include a method for determining the success/failure of the project and assessing its impact.



<sup>3</sup> SOURCE: United States Department of Agriculture (USDA), 2006 at: <http://www.rurdev.usda.gov/rbs/busp/rbog.htm>

### **Federal Agencies/Programs**

- Department of Agriculture Rural Development Administration – [www.rurdev.usda.gov](http://www.rurdev.usda.gov)
- US Small Business Administration – [www.sba.gov](http://www.sba.gov): provides financial, technical and management assistance to help Americans start, run and grow their businesses.
- US Department of Commerce – [www.doc.gov](http://www.doc.gov)
- US Department of Transportation – [www.dot.gov](http://www.dot.gov)

## **Economic Development Issues & Concerns**

### **Residential Development as Economic Development**

To some, residential development is a growing source of taxable income. However, housing requires far more services than commercial, industrial and agricultural development. As a result, residential development may not be an effective, long-term strategy to increase the local tax base.

A number of community studies have been completed across the country that compare tax revenue generated by different land uses (i.e. commercial, industrial, single-family residential, multi-family residential, etc.) to the services they require. These assessments, known as *Cost of Community Services* (COCS) studies, have demonstrated that single-family residential development routinely increases public costs by a larger amount than it increases tax revenue. In contrast, commercial and industrial developments have a more positive balance relative to tax dollars paid and dollars expended on services; and, agricultural lands and open space fare even better.

#### **Cost of Community Services in the Town of Dunn, Dane County**

The premier example of such a study in Wisconsin was completed by the Town of Dunn, Dane County in 1994. Many subsequent studies have relied on the Town of Dunn as a model in their efforts<sup>4</sup>. The Dunn study revealed that for every \$1 in tax revenue collected by the Town, \$1.06 was required in local services. The ratios for commercial and industrial uses were far more favorable (i.e. for every \$1 in tax revenues collected significantly less than \$1 of service costs were required). The tax ratio was most favorable for farmland and natural areas that required generally around \$0.15 in services for each \$1 in taxes collected. As a result of this study, the Town of Dunn estimates that residential development costs taxpayers \$1,060 in services for every \$1,000 paid in property taxes. Farm and parkland only cost \$180 to service for the same \$1,000 in taxes paid.

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<sup>4</sup> Additional Information about the Town of Dunn Community Services Study is available on-line at [www.town.dunn.wi.us](http://www.town.dunn.wi.us).

Clearfield supports the idea that new residential development should pay a fair and proportionate share of its service costs and complete necessary studies to adequately gauge their impact on traffic and schools. To achieve this, impact fees (in accordance with Act 477<sup>5</sup>) can be used to require that new development pay a fair and equitable share of road improvement and park costs, among others. If new development stops or slows significantly, revenue generated from impact fees will decrease or disappear.

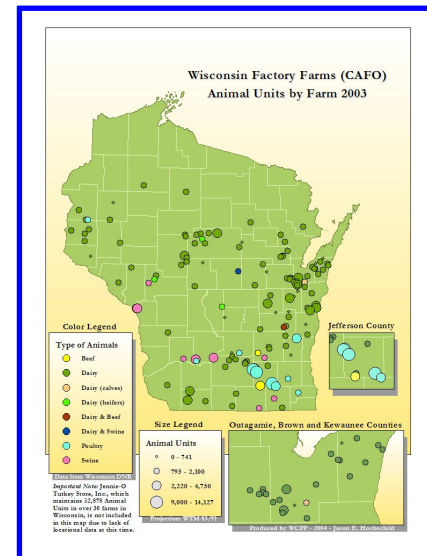
To make informed land use decisions, the Town must consider the full costs and benefits of new development. Just as an Environmental Impact Statement allows for an understanding of the effects of building projects on environmental resources, Property Tax Impact Statements help decision-makers to assess the full costs and benefits of new development. Property Tax Impact Statement estimate the additional costs of providing and servicing schools, roads, fire, police, water, sewer and other public services that will be required for each new development. With a Property Tax Impact Statement decision-makers will know up-front what the Town will be paying for and will be able to decide if a development is beneficial or detrimental to Clearfield from a financial standpoint. These statements may be prepared by a developer, or the Town could possibly contract with an independent analyst, the cost of which would be paid by the developer.

### Concentrated Animal Feeding Operations (CAFOs)

Concentrated animal feeding operations (CAFOs) may be of concern to many residents of Clearfield. In order for a CAFO to be approved, it must be in accordance with State regulations (refer to *Chapter 5: Agricultural, Natural, and Cultural Resources* for more information regarding ATCP 51). It is possible that no suitable location may be found in the Town of Clearfield for a CAFO.

### Respecting Rural Character

The visions in preceding chapters highlighted the need to preserve natural features, maintain farmland, and continue to offer a quality rural living environment. Accordingly, it is important that economic development respect these visions by being of a complimentary scale. Intensive industry (with potential pollution concerns) and large commercial establishments (i.e. big box stores, strip malls, etc.) are not consistent with this image.



Source: CAFOs in Wisconsin and Risks to Human Health and the Environment, Midwest Environmental Advocates, 2004.

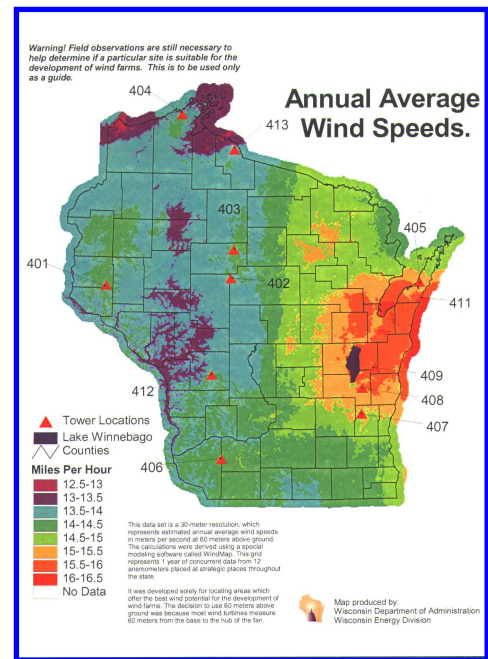
<sup>5</sup> Passed May 30, 2006, Act 477 updates impact fee legislation. Counties can no longer collect impact fees, and municipalities can no longer use them for “other transportation uses” (allows roads, not the purchase of vehicles) or “other recreational uses” (allows money for parks, playgrounds, and land for athletic fields, not for improvements of these fields). Fees are to be collected from the builder or property owner within 14 days of the issuance of the building or occupancy permit, must be placed in separate accounts, and must be spent within 7 years or refunded.

While a limited number of new businesses may be established in Clearfield, they must be appropriately located to minimize potential conflicts with residential areas. Furthermore, new business development must exist in harmony with the rural setting. To further protect the rural landscape from development, the Town may want to coordinate with Juneau County to consider opportunities for purchase and transfer of development rights programs. These types of programs are discussed in detail in *Chapter 5: Agricultural, Natural and Cultural Resources*.

### Economic Development and Energy Production

As the illustration at right shows, the Town of Clearfield experiences sustained winds significant enough to support wind energy production. This situation provides the potential for wind turbines in the Town. The siting of a wind turbine provides a landowner direct economic gains. For this reason, wind towers can be particularly enticing to landowners who can benefit from the financial return and still continue to farm the land surrounding the turbine without the conflicts that arise when farmland is sold for residential uses (i.e. complaints about farm noise, odors, hours of operation, etc.). Moreover, having available local sustainable energy supplies is a positive economic factor that may influence some businesses to locate in the region.

Wind farms are not without their concerns, including: noise, visual impact, impacts on wildlife, and economic effects on land values for properties surrounding turbines or properties with views of turbines. For wind turbines to be effectively located in Clearfield, areas should be selected that are agricultural in character with limited nearby residential development. Please refer to *Chapter 4: Utilities & Community Facilities* for additional information on wind-generated power.



### Coordination with Other Comprehensive Plan Chapters

#### Future Land Use Chapter

Any new business development must be located in areas that the market will support. At the same time, new development should not create a nuisance for neighboring properties or natural resources. These criteria were carefully considered during the development of the Future Land Use Map.

### **Transportation Chapter**

Any new business development Clearfield should be done in coordination with Juneau County and WisDOT in order to ensure that traffic is appropriately planned and sited to minimize its impact on adjacent roadways. This may require periodic traffic studies to assess the affect of proposed developments. Pedestrian and bicycle access must also be considered.

### **Housing Chapter**

Economic development in Clearfield may bring visitors to the Town who decide its rural, scenic, country-setting is an ideal location to live. Successful business development can also result in jobs that bring people to the community looking for places to live near their place of employment. Accordingly, areas for housing development, consistent with state growth projections, are provided on the Future Land Use Map.

### **Utilities & Community Facilities**

To support economic development, infrastructure (sanitary service, transportation, electricity, communication, etc.) must be available to meet the needs of businesses. *Chapter 4: Utilities and Community Facilities* chapter discusses Clearfield's existing and planned infrastructure to serve the needs of the community, including economic interests.

## **Economic Development Policies, Goals, and Objectives**

The policies, goals, and objectives related to Economic development in the Town of Clearfield can be found in *Chapter 10: Implementation*.