# Mobilizing the Transformative Power of WHAM:

## Overcoming Obstacles to Integrated Infrastructure Investments in Los Angeles County

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With support from voters, Los Angeles County is investing billions of dollars from Measures W, H, A, and M in clean, safe water, housing and homeless services, parks and open space, transportation, and climate resilience. These projects have the potential to transform our quality of life in Los Angeles County. The Board of Supervisors created a WHAM Taskforce to ensure that the agencies implementing these measures collaborate on multibenefit projects to uplift communities hardest hit by Covid-19 and build resilience equitably across the county. Early on, these efforts hit roadblocks that we identify in this report.

#### To realize the goals declared by the Board, we recommend:

#### That the Board of Supervisors:

- Direct county agencies to collaborate on implementing one multi-benefit pilot project in each supervisorial district.
- Encourage the Metro Board to adopt the WHAM Taskforce's goals and work plan.
- Direct the Chief Sustainability Office to form a strike team to identify and solve impediments to collaboration and convene a multi-agency and stakeholder learning community.
- Fund community engagement to inform the pilot projects.
- Fund an independent evaluation of WHAM implementation to learn, improve, and ensure success.

#### And that the philanthropic community:

- Fund an independent legal review to identify legal impediments to interagency collaborative funding and implementation of multibenefit projects as well as opportunities for improvements in integrated implementation.
- Continue to fund community-based organizations and nonprofits to develop and expand their own research, technical, and advocacy capacities to engage in developing multi-benefit projects.









## **Executive Summary**

In recent years, Los Angeles County voters have approved tax measures for stormwater management (W), parks (A), and transportation (M) infrastructure. Voters also have supported measures for housing and services for homeless residents of Los Angeles County (H). These taxes were expected to generate more than \$1.6 billion a year.¹ Together these measures have come to be called WHAM, a fitting acronym for voter-approved taxes that could have transformative impact in Los Angeles, especially in the county's most disadvantaged communities, which have not benefited equitably from infrastructure investments in the past.²

Recognizing this potential for transformative impact, the Board of Supervisors (Board) directed the agencies responsible for the administration of each of the measures to collaborate on multi-benefit projects that combine parks and open space, stormwater management and green infrastructure, transportation, housing, workforce development, job creation, and climate resilience.<sup>3</sup> The Board created a WHAM Committee, later named the WHAM Taskforce, to institutionalize collaboration. And the Board endorsed 10x10, a community-driven process in the WHAM Taskforce's work plan to identify implementable projects in each of the county's five supervisorial districts.

The WHAM work plan presented "a comprehensive pathway to equitable and climate-resilient infrastructure development" in Los Angeles County, the Board declared. "Now more than ever, as the County begins planning for a future economic recovery in the aftermath of the COVID-19 crisis, it is critical that we maximize the resources we have and ensure that they are invested in a way that uplifts the communities that were hardest hit and builds resilience in the face of future shocks and stresses."

Unfortunately, so far, the tremendous potential of multi-benefit projects has been stalled by bureaucratic silos and procedures, some necessary, others not.

Over the past year, as part of the WHAM Taskforce's work plan, community-based organizations from each of the supervisorial districts (SDs) engaged in a collective process called the 10x10 Initiative to identify 10 multi-benefit projects broadly supported

by their communities that could be completed with funding from WHAM measures in the next 10 years.<sup>4</sup> The work plan stated that "10x10 will function as a proof of concept that will foster a long-term pipeline of publicly supported multi-benefit projects in historically underinvested communities." But that is not what happened.

When the 10x10 Initiative presented its projects to the agencies responsible for the WHAM funding measures in the fall of 2020, the community-based organizations were told to talk to each of the agencies individually and apply for funding in their usual silos. This siloed approach will not create the integrated pipeline that the Board has called for to implement multi-benefit WHAM projects equitably in Los Angeles County.

The 10x10 Initiative's effort to secure a specific, implementable commitment of county agencies and departments to collaborate on multi-benefit WHAM projects failed, despite the Board's endorsement of the process in the WHAM work plan. Community hopes were raised around the transformative power of integrated WHAM funding but dashed, unfortunately, once again. Communities that have seen promising plans linger for years and consequently suffer from increasing planning fatigue found one more reason for growing skepticism about the county's ability to equitably implement multi-benefit projects in historically underinvested communities. This resulted despite demonstrated community support for good, long-planned projects.

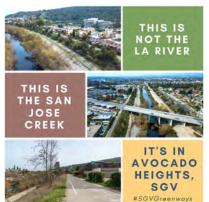
This disconnect alerted us to obstacles in the path of successful WHAM implementation. This report documents the 10x10 Initiative planning process in the context of the WHAM Taskforce and work plan approved by the Board. It also makes recommendations to the Board, the Metro Board, the county's chief sustainability officer, and the philanthropic community for remedies to ensure that we do not miss this historic opportunity to transform Los Angeles equitably through these voter-approved tax measures. We start with our top-level findings and recommendations, followed by an account of the 10x10 Initiative and lessons learned.

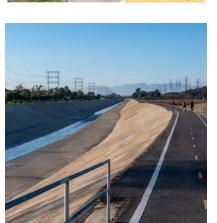
#### **Short Term (Year 1)**





Finding: The Covid-19 pandemic slowed down everything. Taxes and other revenues took a hit. Agencies have had to adjust. Through it all, the county's chief sustainability officer (CSO) has continued to coordinate meetings of the WHAM Taskforce. The agencies in the WHAM Taskforce have submitted lists of projects on which they believe they can collaborate with other agencies. The CSO is preparing recommendations for community feedback at a public meeting to take place in the summer of 2021.





The San Gabriel Valley Greenway Network, a 10x10 project proposed for SD1.

**Recommendation:** This year presents an enormous opportunity for getting WHAM on track. Multi-benefit projects could garner funding not only from WHAM measures but also from a federal infrastructure bill and congressional earmarks, now called "community project funding," and state climate resilience funding. With its focus on climate resilience, which embraces all of the WHAM goals, the CSO's office is well positioned to lead these efforts. The Board of Supervisors should immediately direct the CSO to identify at least one project in each supervisorial district that appears on both the 10x10 Initiative list of community-driven projects and the agencies' lists of potential collaborative projects. The Board should require the relevant funding agencies to collaborate to co-fund solutions and build the projects. We believe that these pilot projects will help to reveal barriers and roadblocks, provide real-time opportunities for problem-solving to create successful multi-benefit projects in the five supervisorial districts, and create precedents and procedures for multi-agency collaborations.



There is tremendous public support in the San Gabriel Valley for increased access to open space, biking, and hiking trails that can provide active and passive recreation and improve physical and mental health and well-being. Community members have great ideas about how to shape public projects to meet these goals and their voices need to be heard."

-David Diaz, ActiveSGV









A 10x10 proposal for an active transportation rail-to-river corridor running from the Crenshaw District to Maywood in SD2.



**Finding:** The Metro Board endorsed the formation of the WHAM Committee, but it has not, yet, formally adopted the WHAM work plan, which the Board of Supervisors has done. This inaction has created some uncertainty about Metro's commitment to the WHAM work plan.

**Recommendation:** The Board of Supervisors should encourage the **Metro Board to formally endorse the WHAM Taskforce and work plan immediately** and direct Metro staff to collaborate on implementing the work plan and the projects identified by the CSO and the Board of Supervisors.



**Finding:** Despite expressions of support for the 10x10 Initiative from the Board of Supervisors and the relevant agencies — Public Works, the Regional Parks and Open Space District, and Metro — at the end of the process the agencies stated that the path forward was for project proponents to meet with their agencies individually. No path was identified for a collaborative approach to move projects forward.

Recommendation: The CSO should assemble a multi-agency strike team to provide high-level technical assistance to the WHAM agencies to work through institutional barriers and bring necessary policy fixes to the Board in order to establish a viable, collaborative path to fund and implement multi-benefit projects. The strike team should also work with local jurisdictions and nonprofit and community-based organizations to deploy coordinated technical assistance from the WHAM agencies to fix any problems impeding successful implementation of the WHAM pilot projects in each supervisorial district. If necessary, the capacity of the CSO's office should be expanded to staff the strike team appropriately.



Community groups would benefit from greater transparency across all county agencies and funding measures to truly understand decision-making and how they can weigh in on these major project opportunities."

—Paul Pulido, SLATE-Z







In SD3, 10x10 proposed "calles verdes," green streets, in San Fernando.



Finding: Agencies are constrained by the legal language of each of the funding measures that voters authorized, as well as by ordinances that govern implementation. The WHAM work plan recognizes this. However, agencies also have wide administrative latitude to define important elements of implementation. Agencies tend to invoke legal constraints when they do not want to exercise creative flexibility to get things done, and they exercise administrative latitude when they do want to get things done. These fluctuations cause confusion among stakeholders and the public, who do not have the legal expertise to determine the real latitude agencies have to collaborate on multibenefit projects.

Recommendation: The philanthropic community should immediately fund an independent legal review of the WHAM measures, implementing ordinances, and guidelines to determine the constraints and flexibility that agencies have in implementing equitable, collaborative, community-driven, multi-benefit projects. This review should be funded independently of the county and distributed publicly so that stakeholders and agencies have a common understanding of potential pathways and limits to collaboration.



Finding: Although many of the potential projects identified in the 10x10 Initiative already have been vetted through a variety of local planning processes which included robust community engagement, ongoing community participation will be necessary to ensure continuing public support for these multi-benefit investments. Transparency and really listening to public input will be crucial for the long-term success of WHAM.

**Recommendation:** County agencies should coordinate to fund **robust community-engagement around the WHAM pilot projects** through trusted local community-based organizations that can educate residents to increase understanding and cultivate ongoing support for WHAM projects. The "OurCounty" sustainability plan provides a model for this kind of community engagement.<sup>7</sup>







Finding: The WHAM Taskforce was created to identify obstacles and solutions for funding and implementing multi-benefit projects. Creation of a learning culture at the county level, informed by project experiences and insights, will be essential for identifying policy and systems changes necessary for sustained success. Doing so also could foster changes within the cultures of siloed agencies as they learn from each other while collaborating and completing successful projects. Two philanthropically funded projects called "Link" and "Redesign LA" are currently creating this kind of learning community among nonprofit technical assistance providers, community-based organizations, and funders to implement multi-benefit projects in high-need areas of the county.8 These projects provide a model for in-depth technical assistance and cross-sector collaboration that could be replicable in WHAM projects.



Recommendation: Regularly — monthly at first and then quarterly when construction is underway — convene the multi-agency teams, key stakeholder organizations, and funders working on all of the WHAM pilot projects to share lessons and challenges and identify obstacles and solutions. These convenings should periodically include stakeholders, such as those involved in the Link and Redesign LA projects so that lessons can be shared among agencies and the wider community. And the philanthropic community should continue to fund community-based organizations and nonprofits to develop and expand their own research, technical, and advocacy capacities to engage in developing multi-benefit projects.9



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These projects are innovative. They don't fit within standard plans. When you add stormwater capture infrastructure to a park, the permit and project costs can double. We need changes in planning and permitting to keep up with current best practices to ensure that future projects are permitted in a streamlined fashion."

In SD4, 10x10 offered a vision plan for multiple benefits at DeForest Park in Long Beach.

-Meredith McCarthy, Heal the Bay

#### **Medium Term (Year 2)**







10x10 proposed a transit-to-trails program for accessing the San Gabriel Mountains in SD5.



**Finding:** As noted above, administrative and legal constraints present some obstacles to collaboration across multiple agencies using multiple funding sources, including competitive grants. Some of these constraints may require policy fixes from the Board of Supervisors.

Recommendation: Within one year of beginning the implementation of the WHAM pilot projects, the CSO should provide the Board with a set of recommendations for policy fixes and other changes necessary to institutionalize collaborative approaches. Given that many projects will take longer to fully implement, the CSO should update the Board annually on any other recommendations that emerge from measurement, evaluation, and learning.



Finding: The CSO is developing a set of metrics for measuring the success of WHAM. These metrics will be useful for the Board to track success at the county level. A complementary independent evaluation of the WHAM pilot projects could provide valuable insight and learning to inform the Board's decisions about any policy or systems changes that could be necessary for the success of WHAM. An independent evaluation also could measure the costs and benefits of multi-agency collaboration on WHAM projects. Assumptions could be tested and costs and benefits quantified, such as increased efficiencies, particularly in areas such as technical assistance and community engagement, as well as increases in overall benefits at lower total costs from multi-benefit projects.

**Recommendation:** The Board should **fund an independent evaluation of the five WHAM pilot projects** that runs parallel with implementation and provides updates to the Board on implementation milestones and metrics.

#### Long Term (Year 3+)







Finding: The Board of Supervisors and the Metro Board currently are the two authorities that can compel agencies to collaborate on multi-benefit WHAM projects. The two boards could establish another authority to incentivize, fund, manage, and institutionalize multi-agency collaborations. A joint powers authority (JPA) is a standard vehicle for multi-agency collaborations. A new model — a joint benefits authority (JBA) — is being developed in San Francisco by the World Resources Institute, Encourage Capital, the Liquid Assets Project, and the San Francisco Public Utility Commission for joint planning, funding, project delivery, and long-term stewardship of multi-benefit projects. The JBA "addresses the needs of each individual department and the community" and it considers "neighborhood challenges holistically to develop a fully integrated project that captures increased benefits." 10



**Recommendation:** The Board should direct the CSO to **research** and consider the potential for creating a JPA or JBA as a vehicle for **institutionalizing interagency collaborations** on multi-benefit projects in Los Angeles County.



Now more than ever, as the County begins planning for a future economic recovery in the aftermath of the COVID-19 crisis, it is critical that we maximize the resources we have and ensure that they are invested in a way that uplifts the communities that were hardest hit and builds resilience in the face of future shocks and stresses."

—Los Angeles County Board of Supervisors



## The 10x10 Initiative

The 10x10 Initiative was created out of a desire to achieve equitable infrastructure development in Los Angeles County by leveraging four countywide funding sources: Measures W, H, A, and M.<sup>11</sup> In 2016, Los Angeles County voters passed Measures A and M to help improve our regional parks and transportation systems. In 2017, voters passed Measure H to combat homelessness. And in 2018, voters passed Measure W to manage stormwater and help improve water quality and supply.

These four measures were projected to generate more than \$1.6 billion annually to create and maintain neighborhood parks and open space. improve transportation options county-wide, protect the region's water quality and supply, and provide services to help homeless people get housing. The goal of the 10x10 Initiative was to identify 10 projects in L.A. County, two in each supervisorial district, that exemplify multi-benefit, equitable and community-informed approaches to infrastructure investment.12 These 10 projects — to be completed within 10 years to meet the opportunity for international visibility in the 2028 Olympic Games in Los Angeles — would serve as examples of what is possible in our region, spur the development of similar projects, and attain multiple benefits for less overall cost, such as:

- Employing best management practices for water quality and supply;
- Enhancing open space and biodiversity:
- Connecting people with bikeways or transit options in their neighborhoods and near their iobs;
- Creating neighborhood infrastructure that improves public health, reduces exposure to environmental hazards, and enhances climate resilience;

- Generating good, green, local, skilled jobs;
   and
- Avoiding displacement of communities that projects are designed to benefit.

The 10x10 Initiative also presented an opportunity to engage community-based organizations that had organized and mobilized their constituents to vote for the WHAM measures. The initiative encouraged these organizations to advocate for deployment of these county funds equitably and transparently for multi-benefit, community-supported infrastructure projects.

The initiative brought together 17 organizations across L.A. County to collaboratively identify projects with strong local political and community support in each supervisorial district. With funding from the Liberty Hill Foundation and Environment Now, Estolano Advisors coordinated and facilitated the 10x10 Initiative. The Liberty Hill Foundation provided small capacity-building grants to eight of the community-based organizations to support their participation in the initiative.

Participating organizations included: Active San Gabriel Valley, From Lot to Spot, Heal the Bay, Investing in Place, Long Beach Forward, Los Angeles Alliance for a New Economy, Los Angeles Neighborhood Initiative, Los Angeles Neighborhood Land Trust, Nature for All, Pacoima Beautiful, South Los Angeles Transit Empowerment Zone, The Nature Conservancy, and TreePeople. Participating funders included Environment Now, Liberty Hill Foundation, Resources Legacy Fund, and the Water Foundation.<sup>13</sup>

#### The 10x10 Initiative

From August 2019 to August 2020, Estolano Advisors facilitated six meetings of the full group, in which participants came together to brainstorm their initial project lists, develop criteria for prioritizing projects, and discuss strategies for vetting potential projects with additional community partners. Members of the full group were split into five groups, each group corresponding to one of L.A. County's five supervisorial districts. Estolano Advisors facilitated a series of small group meetings with each district team to prioritize a short list of competitive projects for each district, considering opportunities to enhance each project, each project's status, and local political and community support for each project. Examples of projects included a San Gabriel Valley greenway network in SD1, an active transportation rail-to-river corridor in South Central and Southeast Los Angeles in SD2, "calles verdes" or green streets in San Fernando in SD3, a vision plan for multiple benefits at DeForest Park in Long Beach in SD4, and a transit-to-trails program for accessing the San Gabriel Mountains in SD5.

The 10x10 Initiative was successful in three ways: 1) supporting community-based organizations in L.A. County to engage in planning for the implementation of major funding measures which they had advocated and helped pass; 2) forming new partnerships between organizations in different parts of the county and across conservation, environmental justice, workforce, and transportation-focused sectors; and 3) developing the 10x10 project list and presenting priority projects to the WHAM Taskforce.

Early on, the 10x10 Initiative engaged the Board of Supervisors and their staff to discuss the value and urgency in prioritizing multi-benefit projects across the region and to identify priority projects in each supervisorial district. The group used local and regional planning documents and project lists developed by other organizations to generate an initial list of more than 90 potential projects across L.A. County. With guidance from Estolano

Advisors, the initiative created a prioritization tool to assess the potential of each project to successfully compete for WHAM funding. The prioritization tool included these and other questions:

- Does the project have the necessary land entitlements?
- Can the project leverage multiple funding sources?
- Is there political will or can it be developed to drive the project toward completion within 10 years?
- Does substantial community support exist for this project, and is it aligned with current community plans and priorities?
- Does the plan for the project include antidisplacement measures?

Through application of the prioritization criteria and conversations with community partners in each district, participants in the 10x10 Initiative worked in each supervisorial district to identify two to five priority projects. Though participants were initially asked to identify two projects per district, the task of narrowing down proved quite challenging, because the needs are so great in each district. Many groups identified more than two priority projects.

The 10x10 Initiative culminated in a presentation to the WHAM Taskforce in September 2020, in which representatives of community-based organizations presented the most viable, top-priority projects they had identified in each of the five districts. Taskforce members stated that they were impressed with the 10x10 Initiative's work and recommendations, but when participants asked what the next steps should be to advance these projects, the WHAM Taskforce members invited the presenters to discuss the projects with their agencies individually and apply for project funding through their usual channels.



## Lessons Learned

Although discussions about WHAM collaborations are ongoing and great hope remains for the transformative power of WHAM, the agencies and departments that control WHAM funding clearly are reluctant to relinquish power and control over their existing decision-making processes. Thus they are unable to surmount their own bureaucratic silos and break out of their molds for the greater good of collaborative project development. Agencies and departments may be constrained by existing administrative structures, processes, rules, guidelines, and ordinances, although those constraints are sometimes overstated. They do not have incentives to collaborate, and they may not see the benefits until they actually begin collaborating.

That is why the Board of Supervisors, the Metro Board, and the philanthropic community should take immediate, decisive action to firmly guide county agencies and departments toward integrated, collaborative project development and implementation. The Board of Supervisors and the Metro Board are the only bodies with enough power and accountability to compel the county agencies and departments to collaborate. There likely will be policy fixes — changes to administrative structures, rules, guidelines, and perhaps even ordinances — that can be accomplished only by the two boards. And the philanthropic community can provide support for an independent legal review and ongoing capacity building for the community-based organizations and nonprofits that are crucial players in this ecosystem.

Pilot projects offer an effective approach to uncover and fix impediments to effective multiagency collaboration, while achieving real outcomes and beneficial impacts on the ground. That is why we recommend that the Board of Supervisors and the Metro Board take action to require the WHAM agencies to identify and work together immediately on at least one multi-benefit project in each supervisorial district. Through this experience the agencies will identify obstacles and the policy and systems changes needed to implement transformative projects in the communities that most urgently need them in Los Angeles County.

The need, of course, goes way beyond the first five WHAM projects, but only by intentionally and deliberately working through the first five projects can a path be forged for future successes.

Los Angeles County has the essential preconditions for success that Eugene Bardach, a professor of public policy at UC Berkeley, identified in *Getting Agencies to Work Together: The Practice and Theory of Managerial Craftsmanship,* his classic study of interagency collaborations nationwide. In Los Angeles right now "the politics, the personalities, and the policy...are all aligned at once."

We have a "high-quality operating system" in our county agencies, engaged experts and stakeholders, nonprofits, philanthropies, and community-based organizations. We have acquired "resources" through the voter-approved WHAM measures. The Board has created a "steering process" through the WHAM Taskforce. The WHAM Taskforce is developing a "culture of trust and joint problem-solving." Now we all need to work together to create and manage "a strategically sequenced developmental process." 14

## **Acknowledgments**

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### **Endnotes**

- 1 Measure W: \$300 million annually; Measure H: \$355 million annually for 10 years; Measure A: \$96 million annually; Measure M: \$860 million annually. The Covid-19 pandemic caused a decline in some of these tax revenues.
- In November 2020, voters approved Measure J, which allocates at least 10% of the county's locally generated, unrestricted funding to address racial injustice through community investments, such as youth development, job training, small business development, supportive housing services, and alternatives to incarceration. Measure J also could contribute to these transformative multi-benefit investments, leading some to advocate for "J-WHAM."
- See: "Leveraging and Coordinating Green Infrastructure Funding: Creating the WHAM Committee," Motion by Supervisors Sheila Kuehl and Hilda L. Solis, December 3, 2019: http://file.lacounty.gov/SDSInter/bos/ supdocs/142249.pdf; and "Leveraging and Coordinating Green Infrastructure Funding: Implementing the WHAM Committee Workplan," Motion by Supervisors Sheila Kuehl and Hilda L. Solis, June 9, 2020: http://file.lacounty.gov/ SDSInter/bos/supdocs/146336.pdf. The taskforce was convened by the Chief Executive Office of the County and includes the Los Angeles County Flood Control District (Measure W), the County CEO's office (Measure H), the Regional Parks and Open Space District (Measure A), and the Metropolitan Transit Authority (Measure M), along with the Chief Sustainability Office and the director of the Department of Public Health. A subcommittee on workforce development was also created and includes representatives from Workforce Development, Aging and Community Services, the Department of Human Resources, and the Worker Education and Resource Center.
- 4 The 10x10 Initiative was supported by grants from the Liberty Hill Foundation and Environment Now.
- 5 Sachi Hamai, "Leveraging and Coordinating Green Infrastructure Funding: Creating the WHAM Committee (Item No. 4, Agenda of December 03, 2019," County of Los Angeles Chief Executive Office, June 8, 2020, Attachment 1, page 20.
- 6 "Leveraging and Coordinating Green Infrastructure Funding: Creating the WHAM Committee," Motion by Super-

- visors Sheila Kuehl and Hilda L. Solis, June 18, 2020: https://metro.legistar.com/ViewReport.ashx?M=R&N=Tex-tL5&GID=557&ID=6857&GUID=LATEST&Title=Board+Report
- 7 See https://ourcountyla.lacounty.gov/.
- 8 The Link program is funded by The California Wellness Foundation, First 5 LA, Resources Legacy Fund, and The Rosalinde and Arthur Gilbert Foundation, and includes Active San Gabriel Valley (ActiveSGV), Communities for a Better Environment, the Los Angeles Neighborhood Land Trust, Pacoima Beautiful, and the Trust for Public Land. The Link program is modeled on Redesign LA, a similar program developed by the Water Foundation and the Council for Watershed Health, which has included ActiveSGV, API Forward, Community Repower Movement, East Yard Communities for Environmental Justice, Koreatown Youth and Community Center, Pacoima Beautiful, and Promesa Boyle Heights.
- 9 For more on how to support community-based organizations throughout the implementation process see "Measures Matter: Ensuring Equitable Implementation of Los Angeles County Measures M & A," Vanessa Carter et al., USC Dornsife Program for Environmental and Regional Equity, Los Angeles, 2018: https://dornsife.usc.edu/pere/measures-matter-la/.
- 10 "Joint Benefits Authority: Integrated Public Investments for Livable Cities," World Resources Institute: https://wriorg.s3.amazonaws.com/s3fs-public/uploads/joint-benefits-authority.pdf
- 11 The authors thank Estolano Advisors for providing an account of the 10x10 Initiative, which they facilitated, and upon which this seaction of this report is partially based. The authors are solely responsible for this report.
- 12 Estolano Advisors, "10x10 Concept Paper," January 13, 2020.
- 13 Not all organizations participated for the full duration of the effort.
- 14 Eugene Bardach, *Getting Agencies to Work Together: The Practice and Theory of Managerial Craftsmanship*,
  Washington, D.C.: Brookings Institution Press, 1998,
  pages 310 and 321.