

KING COUNTY

1200 King County Courthouse 516 Third Avenue Seattle, WA 98104

Signature Report

March 14, 2006

Ordinance 15384

Proposed No. 2005-0487.2

Sponsors Edmonds, Hammond, Hague and Constantine

1	AN ORDINANCE relating to the Regional Wastewater
. 2	Services Plan reporting requirements, amending Ordinance
3	13680, Section 5, as amended, and K.C.C. 28.86.050, and
4	Ordinance 13680, Section 12, and K.C.C. 28.86.120, and
5	Ordinance 13680, Section 13, and K.C.C. 28.86.130,
6	Ordinance 12353, Section 2, as amended, and K.C.C.
7	4.90.010 and Ordinance 11398, Section 1, as amended, and
8	K.C.C. 28.84.055 and adding a new section to K.C.C.
9	chapter 28.86.
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12	STATEMENT OF FACTS:
13	1. The Regional Wastewater Services Plan ("RWSP") was adopted by the
14	King County council in November 1999 by Ordinance 13680 and
15	subsequently codified in K.C.C. chapter 28.86.
16	2. The RWSP is a supplement to the King County comprehensive water
17	pollution abatement plan. The RWSP identifies projects and programs

18	needed to provide wastewater capacity for homes and businesses in the
19	wastewater service area through the year 2030. The RWSP also provides
20	policy direction for the operation and continued development of the
21	wastewater system and its capital improvement program. Many of the
22	policies include reporting requirements that allow for review and oversight
23	of RWSP projects and programs by the King County executive, council,
24	council committees and staff.
25	3. K.C.C. chapter 28.86 includes several policies that describe RWSP
26	reporting requirements related to odor control, treatment plant siting,
27	infiltration and inflow control, water quality monitoring, RWSP
28	implementation and review, and finance. The frequency of these reports
29	ranges from "as needed," to once every three years, though most are
30	required annually at different times throughout the year. Some of these
31	reports are redundant or outdated or have due dates inconsistent with the
32	availability of necessary information, completion of key milestones or
33	time needed to complete data collection and analysis. This ordinance
34	eliminates redundancies in the reporting requirements, adjusts the due
35	dates to reflect the availability of information, consolidates the reporting
36	requirements into fewer, but more comprehensive, reports and facilitates
37	future changes or additions to these requirements.
38	4. The King County council adopted provisos to the 2001 Budget
39	Ordinance (Ordinance 14018, Section 126) and the 2005 Budget

Ordinance (Ordinance 15083, Section 116) that included reporting

requirements related to RWSP projects. Although these ordinances are only in effect for the associated budget year, the intent was for the reports in these provisos to be provided on an ongoing basis. Section 6 of this ordinance incorporates the reporting requirements of these provisos.

BE IT ORDAINED BY THE COUNCIL OF KING COUNTY:

<u>SECTION 1.</u> Ordinance 13680, Section 5, as amended, and K.C.C. 28.86.050 are each hereby amended to read as follows:

Treatment plant policies (TPP).

A. Explanatory material. The treatment plant policies are intended to guide the county in providing treatment at its existing plants and in expanding treatment capacity through the year 2030. The policies direct that secondary treatment will be provided to all base sanitary flows. The county will investigate possible tertiary treatment with a freshwater outfall to facilitate water reuse. The policies also direct how the county will provide the expanded treatment capacity necessary to handle the projected increases in wastewater flows resulting from population and employment growth. The policies provide for the construction of a new treatment plant (the north treatment plant) to handle flows in a new north service area, expansion of the south treatment plant to handle additional south and east King County flows($(\frac{1}{2})$) and the reservation of capacity at the west treatment plant to handle Seattle flows and CSOs. The potential for expansion at the west and south treatment plants will be retained for unanticipated circumstances such as changes in regulations. The policies address goals for odor control at treatment plants. The

policies also describe	e a cooperative	siting process	for the new	north	treatment j	plant and
its outfall.						

B. Policies.

TPP-1: King County shall provide secondary treatment to all base sanitary flow delivered to its treatment plants. Treatment beyond the secondary level may be provided to meet water quality standards and achieve other goals such as furthering the water reuse program or benefiting species listed under the Endangered Species Act (ESA).

TPP-2: King County shall provide additional wastewater treatment capacity to serve growing wastewater needs by constructing a new north treatment plant in north King County or south Snohomish County and then expanding the treatment capacity at the south treatment plant. The west treatment plant shall be maintained at its rated capacity of one hundred thirty-three mgd. The south treatment plant capacity shall be limited to that needed to serve the eastside and south King County, except for flows from the North Creek Diversion project and the planned six-million-gallon storage tank. The potential for expansion at the west treatment plant and south treatment plant should be retained for unexpected circumstances which shall include, but not be limited to, higher than anticipated population growth, new facilities to implement the CSO reduction program or new regulatory requirements.

- TPP-3: Any changes in facilities of the west treatment plant shall comply with the terms of the West Point settlement agreement.
- TPP-4: King County's goal is to prevent and control nuisance odor occurrences at all treatment plants and associated conveyance facilities and will carry out an odor

prevention program that goes beyond traditional odor control. To achieve these goals, the following policies shall be implemented:

- 1. Existing treatment facilities shall be retrofit in a phased manner up to the High/Existing Plant Retrofit odor prevention level as defined in Table 1 of Attachment A to ((this o))Ordinance 14712, the odor prevention policy recommendations dated March 18, 2003. This level reflects what is currently defined as the best in the country for retrofit treatment facilities of a similar size. Odor prevention systems will be employed as required to meet the goal of preventing and controlling nuisance odor occurrences;
- 2. Existing conveyance facilities that pose nuisance odor problems shall be retrofitted with odor prevention systems as soon as such odors occur, subject to technical and financial feasibility. All other existing conveyance facilities shall be retrofitted with odor control systems during the next facility upgrade;
- 3. The executive shall phase odor prevention systems implementing the tasks that generate the greatest improvements first, balancing benefit gained with cost, and report to the council on the status of the odor prevention program ((annually. This report shall include a listing and summary of odor complaints received and detail progress on implementing odor prevention policies and projects)) in the annual RWSP report as outlined in section 6 of this ordinance;
- 4. New regional treatment facilities shall be constructed with odor control systems that are designed to meet the High/New Plant odor prevention level as defined in Table 1 of Attachment A to ((this o))Ordinance 14712, the odor prevention policy recommendations dated March 18, 2003. This level reflects what is currently defined as the best in the country for new treatment facilities of a similar size;

108	5. New conveyance facilities serving these new regional treatment facilities
109	shall also be constructed with odor control systems as an integral part of their design;
110	6. Design standards will be developed and maintained for odor control systems
111	to meet the county's odor prevention and control goals;
112	7. A comprehensive odor control and prevention monitoring program for the
113	county's wastewater treatment and conveyance facilities will be developed. This program
114	shall include the use of near facility neighbor surveys and tracking of odor complaints
115	and responses to complaints and shall consider development of an odor prevention
116	benchmarking and audit program with peer utilities; and
117	8. New odor prevention and measurement technologies will be assessed and
118	methods for pilot testing new technologies identified when determined by the executive
119	to be necessary and appropriate for achieving the goals of this policy.
120	TPP-5: King County shall undertake studies to determine whether it is
121	economically and environmentally feasible to discharge reclaimed water to systems such
122	as the Lake Washington and Lake Sammamish watersheds including the Ballard Locks.
123	TPP-6: When there are opportunities to transfer flows between King County's
124	treatment facilities and treatment facilities owned and operated by other wastewater
25	utilities in the region, the county shall evaluate them. Such evaluation shall include, but
26	not be limited to cost, environmental and community impacts, liability, engineering
27	feasibility, flexibility, impacts to contractual and regulatory obligations and consistency
.28	with the level of service provided at the county owned and operated facilities.
29	TPP-7: King County may explore the possibility of constructing one or more
.30	satellite treatment plants in order to produce reclaimed water. The county may build

these plants in cooperation with a local community and provide the community with reclaimed water through a regional water supply agency. In order to ensure integrated water resource planning, in the interim period prior to the development of a regional water supply plan, King County shall consult and coordinate with regional water suppliers to ensure that water reuse decisions are consistent with regional water supply plans. To ensure costs and benefits are shared equally throughout the region, all reclaimed water used in the community shall be distributed through a municipal water supply or regional water supply agency consistent with a regional water supply plan.

TPP-8: King County shall continue water reuse and explore opportunities for expanded use at existing plants, and shall explore water reuse opportunities at all new treatment facilities.

TPP-9: A comprehensive public involvement program shall be developed and implemented to provide the public, at a minimum, the opportunity to give input on the criteria and the screening process used for selecting the list of possible sites for the new north treatment plant, its conveyance system and outfall and to comment on the final selection of a site. The King County executive shall establish one or more committees to aid in the siting of a north treatment plant. The committees shall, at a minimum, evaluate siting criteria to be used and propose a narrowed list of sites for consideration by the executive after consulting with the council as follows:

1. The King County executive shall transmit a motion to the council that establishes the criteria by which sites will be selected; and

152	2. The executive shall provide the council with timely reports that detail the
153	sites that meet the criteria and are under consideration and, at a later date, those sites that
154	are final candidates for the siting of the north treatment plant.
155	TPP-10: Based on criteria approved by the council, the King County executive
156	shall have the final decision on the site for a north treatment plant.
157	SECTION 2. Ordinance 13680, Section 12, and K.C.C. 28.86.120 are each
158	hereby amended to read as follows:
159	Water quality protection policies (WQPP).
160	A. Explanatory materials. The water quality protection policies are intended to
161	guide King County in identifying and resolving regional water quality issues, protecting
162	public and environmental health and protecting the public's investment in wastewater
163	facilities and water resource management. Research and analysis are required and will be
164	used to evaluate water quality in county streams and other bodies of water within the
165	service district.
166	B. Policies.
167	WQPP-1: King County shall participate in identifying and resolving water
168	quality issues pertaining to public health and ecosystem protection in the region to ensure
169	that the public's investment in wastewater facilities and water resource management
170	programs is protected.
171	WQPP-2: King County shall evaluate the impacts and benefits of actions that
172	affect the quality of the region's waters and identify measures to meet and maintain water
173	quality standards.

174	WQPP-3: King County shall forecast future aquatic resource conditions that may
175	affect wastewater treatment decisions and work cooperatively to identify cost-effective
176	alternatives to mitigate water quality problems and enhance regional water quality.
177	WQPP-4: King County shall participate with its regional partners to identify
178	methods, plans and programs to enhance water quality and water resources in the region.
179	WQPP-5: The King County executive shall implement a comprehensive water
180	quality monitoring program of streams and water bodies that are or could be impacted by
181	influent, effluent, sanitary system overflows or CSOs. The range of data to be gathered
182	should be based on water pollutants and elements that scientific literature identifies as
183	variables of concern, what is needed to substantiate the benefits of abating combined
184	sewer overflows and what is required by state and federal agencies. The executive shall
185	submit ((annually to council for review a written report shall include:
186	1. Analysis and presentation of water resource sampling, environmental
187	monitoring, economic and other improvement data. The range of data to be gathered
188	should be based on water pollutants and elements that scientific literature identifies as
189	variables of concern in addition to data required by state and federal agencies.
190	2. Analysis regarding the impacts of CSOs and the benefits of abating CSOs.
191	The range of data to be gathered should be based on what is needed to substantiate the
192	benefits of abating overflows in addition to data required by state and federal agencies.
193	3. Other wastewater research activities undertaken by the executive.
194	4. The quality variability of biosolids over time.)) summary reports and
195	comprehensive reviews of this information to the King County council as outlined in
196	section 6 of this ordinance.

on which the RWSP is based.

197	WQPP-6: King County shall implement and maintain water quality, monitoring,
198	evaluating and reporting programs to support the national pollutant discharge elimination
199	system for wastewater and other permit applications, and ensure permit compliance.
200	WQPP-7: King County shall actively participate in the development of water
201	quality laws, standards and program development to ensure cost-effective maintenance or
202	enhancement of environmental and public health.
203	WQPP-8: King County shall assess the risk to human health and the environment
204	from wastewater treatment and conveyance activities, and use this information in
205	evaluating water pollution abatement control options.
206	SECTION 3. Ordinance 13680, Section 13, and K.C.C. 28.86.130 are each
207	hereby amended to read as follows:
208	Wastewater planning policies (WWPP).
209	A. Explanatory material. The wastewater planning policies are intended to guide
210	the county in its long-term comprehensive planning for design and construction of
211	facilities that meet the wastewater needs of customers within the service area.
212	Recognizing that the RWSP is a complex and dynamic comprehensive
213	development guide that will regularly need to be updated, the county will conduct annual
214	reviews $((:1:))$ of plan implementation and its consistency with policies, and $((2:))$ of
215	scientific, economic and technical information((.Every three years conduct a
216	comprehensive review)) as well as periodic comprehensive reviews of the assumptions

218	These policies also express the intent of the council to request that the RWQC
219	continue review of the conditions and assumptions that guide the implementation of the
220	RWSP.
221	B. Policies.
222	WWPP-1: King County shall plan comprehensively to provide for the design and
223	construction of facilities that meet the wastewater system needs of the service area and
224	shall coordinate with other local jurisdictions to ensure that construction-related
225	disruption to neighborhoods is minimized.
226	WWPP-2: In planning future wastewater systems, King County shall make a
227	long-term assessment of wastewater system needs.
228	WWPP-3: In planning for facilities, King County shall work collaboratively with
229	other jurisdictions and look for opportunities to achieve cost savings.
230	WWPP-4: Facility sizing shall take into account the need to accommodate build-
231	out population.
232	WWPP-5: RWSP review processes. King County shall monitor the
233	implementation of the RWSP and conduct ((the following)) reviews of the RWSP((:)) as
234	outlined in section 6 of this ordinance.
235	((1. Implementation. The King County executive shall submit an annual written
236	report and shall report semiannually to the RWQC and the council on siting, permitting,
237	design and construction of any new treatment facilities and associated conveyances,
238	project cost estimates, schedules and issues of concern. The written report shall be
239	submitted no later than December 1 of each year until the facilities to implement the
240	RWSP are operational. The initial report shall identify key decision points during

241	implementation. The executive shall provide timely reports on these key decisions to
242	allow for evaluation for consistency with the adopted policies;
243	2. Annual plan review. The county should ensure that the RWSP reflects current
244	conditions. An annual review of the plan should address water pollution abatement, water
245	quality monitoring results, water conservation and water reclamation, ESA compliance,
246	septic system conversions to the regional sewer system, biosolids management,
247	wastewater public health problems, compliance with other agency regulations and
248	agreements; and
249	3. Comprehensive three year plan review. A comprehensive review of RWSP
250	shall be conducted every three years beginning in 2003. The purpose of the review is to
251	evaluate plan components, including but not limited to: the planning assumptions on the
252	rate and location of growth, phasing and size of facilities, and the effectiveness of policy
253	implementation for I/I reduction, water reuse, biosolids, CSO abatement, water quality
254	protection, environmental mitigation and public involvement. The executive shall
255	transmit a report to the RWQC and the council on the results of the review and may
256	recommend policy changes based on this report, changing regulations, technologies or
257	other emergent or relevant factors. The council should convene an engineering and
258	science panel to independently evaluate the report and recommendations and prepare
259	findings.))
260	SECTION 4. Ordinance 12353, Section 2, as amended, and K.C.C. 4.90.010 are

SECTION 4. Ordinance 12353, Section 2, as amended, and K.C.C. 4.90.010 are each hereby amended to read as follows:

Sewer rate.

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A. Having determined the monetary requirements for the disposal of sewage, the
council hereby adopts a 2006 sewer rate of twenty-five dollars and sixty cents per
residential customer equivalent per month. Once a sewer rate ordinance becomes
effective, the clerk of the council is directed to deliver a copy of that ordinance to each
agency having an agreement for sewage disposal with King County.

- B. The King County council approves the application of Statement of Financial Accounting Standards No. 71 (FAS 71) to establish a rate stabilization reserve for the purpose of leveling rates between years.
- C. As required for FAS 71 application amounts are to be placed in the rate stabilization reserve from 2005 operating revenues and removed from the calculation of debt service coverage for 2005. The reserve balance shall be an amount at least sufficient to maintain a level sewer rate between 2005 and 2006, and shall be used solely for the purposes of: maintaining the level sewer rate in 2006; and if additional reserve balance is available, moderating future rate increases beyond the 2005-2006 period. If the estimated amount of the reserve, as shown in the financial forecast, Attachment A to ((this e))Ordinance 14942, needs to be adjusted to meet debt service coverage requirements for 2005, the county executive shall notify the council of the change by providing an updated financial forecast.
- D. ((Beginning August 23, 2004, and at the end of every calendar quarter thereafter, the executive shall provide a report to the council on the latest cost information on the Brightwater project, including an analysis of the potential impacts on the sewer rate and/or the capacity charge or both.)) The executive shall provide monthly cost reports to the council on Brightwater as outlined in section 6 of this ordinance.

286	SECTION 5. Ordinance 11398, Section 1, as amended, and K.C.C. 28.84.055 are
287	each hereby amended to read as follows:
288	Metropolitan sewage facility charge.
289	A. The amount of the 1994 metropolitan sewage facility capacity charge adopted
290	by K.C.C. 28.84.050.O. shall be seven dollars per month per residential customer or
291	residential customer equivalent for fifteen years.
292	B. The amount of the 1995 metropolitan sewage facility capacity charge adopted
293	by K.C.C. 28.84.050.O. shall be seven dollars per month per residential customer or
294	residential customer equivalent for fifteen years.
295	C. The sewage treatment capacity charge shall be seven dollars per month per
296	residential customer or equivalent for fifteen years for sewer connections occurring
297	between and including January 1, 1996, and December 31, 1996.
298	D. The amount of the sewage treatment capacity charge adopted by K.C.C.
299	28.84.050.O. shall be seven dollars per month per residential customer or equivalent for
300	fifteen years for sewer connections occurring between and including January 1, 1997, and
301	December 31, 1997.
302	E. The amount of the sewage treatment capacity charge adopted by K.C.C.
303	28.84.050.O. shall be ten dollars fifty cents per month per residential customer or
304	equivalent for fifteen years for sewer connections occurring between and including
305	January 1, 1998, and December 31, 1998.
306	F. The amount of the sewage treatment capacity charge adopted by
307	K.C.C.28.84.050.O. shall be ten dollars fifty cents per month per residential customer or

308	equivalent for fifteen years for sewer connections occurring between and including
309	January 1, 1999, and December 31, 1999.
310	G. The amount of the sewage treatment capacity charge adopted by
311	K.C.C.28.84.050.O. shall be ten dollars fifty cents per month per residential customer or
312	equivalent for fifteen years for sewer connections occurring between and including
313	January 1, 2000, and December 31, 2000.
314	H. The amount of the sewage treatment capacity charge adopted by
315	K.C.C.28.84.050.O. shall be ten dollars fifty cents per month per residential customer or
316	equivalent for fifteen years for sewer connections occurring between and including
317	January 1, 2001, and December 31, 2001.
318 .	I. The amount of the sewage treatment capacity charge adopted by
319	K.C.C.28.84.050.O. shall be seventeen dollars and twenty cents per month per residentia
320	customer or equivalent for fifteen years for sewer connections occurring between and
321	including January 1, 2002, and December 31, 2002.
322	J. The amount of the sewage treatment capacity charge adopted by
323	K.C.C.28.84.050.O. shall be seventeen dollars and sixty cents per month per residential
324	customer or equivalent for fifteen years for sewer connections occurring between and
325	including January 1, 2003, and December 31, 2003.
326	K. The amount of the sewage treatment capacity charge adopted by
327	K.C.C.28.84.050.O. shall be eighteen dollars per month per residential customer or
328	equivalent for fifteen years for sewer connections occurring between and including
329	January 1, 2004, and December 31, 2004.

330	L. The amount of the sewage treatment capacity charge adopted by
331	K.C.C.28.84.050.O. shall be thirty-four dollars and five cents per month per residential
332	customer or equivalent for fifteen years for sewer connections occurring between and
333	including January 1, 2005, and December 31,2005. For connections occurring between
334	and including January 1, 2006, and December 31, 2006, said amount shall be thirty-four
335	dollars and five cents per month per residential customer or equivalent for fifteen years,
336	to be reviewed, approved or changed during 2005. For connections occurring between
337	January 1, 2007, and December 31, 2007, said amount shall be thirty four dollars and five
338	cents per month per residential customer or equivalent for fifteen years, to be reviewed,
339	approved or changed during 2006.
340	M. The amount of the sewage treatment capacity charge adopted by K.C.C.
341	28.84.050.O shall be thirty-four dollars and five cents per month per residential customer
342	or equivalent for fifteen years for sewer connections occurring between and including
343	January 1, 2006, and December 31, 2006.
344	In accordance with adopted policy FP-12.3.d. in the Regional Wastewater
345	Services Plan, K.C.C. 28.86.160.C., it is the council's intent to base the capacity charge
346	upon the costs, customer growth and related financial assumptions used in the Regional
347	Wastewater Services Plan ((as updated through every three-year review of the Regional
348	Wastewater Services Plan in accordance with adopted Regional Wastewater Services
349	Plan policy WWPP-5)).
350	In accordance with adopted policy FP-12.3.c., King County shall pursue changes
351	in state legislation to enable the county to require payment of the capacity charge in a

single payment, while preserving the option for new ratepayers to finance the capacity charge.

<u>NEW SECTION. SECTION 6.</u> There is hereby added to K.C.C. chapter 28.86 a new section to read as follows:

Reporting policies.

The executive shall review the implementation of the RWSP on a regular basis and submit the following reports to council and the RWQC:

- A. Regional wastewater services plan annual report. The executive shall submit a written report to the council and RWQC in September each year until the facilities identified in the RWSP are operational. This report, covering the previous year's implementation, will provide the following:
- 1. A summary of activities for each major component of the RWSP, including treatment, conveyance, infiltration and inflow, combined sewer overflows, water reuse, biosolids and highlights of research and development projects underway and proposed for the coming year;
- 2. Details on each active RWSP project in the capital budget, including a project summary, project highlights, project issues, upcoming activities, schedules, an expenditures summary including staff labor and miscellaneous services, a description of adjustments to costs and schedule and a status of the projects contracts;
- 3. A status of the odor prevention program, including a listing and summary of odor complaints received and progress on implementing odor prevention policies and projects;

374	4. A summary of the previous year's results for the comprehensive water quality
375	monitoring program;
376	5. A review of the plan elements, including water pollution abatement, water
377	quality, water reclamation, Endangered Species Act compliance, biosolids management
378	and variability of quality over time, wastewater public health problems, compliance with
379	other agency regulations and agreements, to ensure it reflects current conditions; and
380	6. An update of anticipated RWSP program costs through the year 2030;
381	B.1. Comprehensive regional wastewater services plan review. The executive
382	shall submit a written report to council and RWQC that provides a comprehensive review
383	of the RWSP. The report will review the following:
384	a. assumptions on the rate and location of growth, the rate of septic
385	conversions and the effectiveness of water conservation efforts;
386	b. phasing and size of facilities; and
387	c. effectiveness of RWSP policies implementation, for infiltration and inflow
388	reduction, water reuse, biosolids, CSO abatement, water quality protection,
389	environmental mitigation and public involvement;
390	2. The next comprehensive regional wastewater services plan review is due in
391	September 2007. Subsequent reports will be prepared every three to five years as
392	established by the council and RWQC following their review of the current report. The
393	specific due date will be based upon the availability of necessary information, the
394	completion of key milestones, and the time needed to collect and analyze data. The
395	executive may recommend policy changes based on the findings of the report and other
396	information from changing regulations, new technologies or emerging or relevant factors;

397	3. The comprehensive regional wastewater services plan review will include all
398	elements of the RWSP annual report, replacing it for that year;
399	C. Brightwater monthly report. The executive shall prepare a monthly report to
100	council for the Brightwater project based on a reporting format approved by motion by
401	the King County council. The reporting format shall include a project summary, project
102	highlights, project issues, upcoming activities, schedules, an expenditures summary
103	including staff labor and miscellaneous services, a description of adjustments to costs and
104	schedule and a status of the project's contracts. This report will be distributed
105	electronically and will continue until Brightwater becomes operational; and

D. Operational master plan. The RWSP Operational Master Plan that was

adopted by council in December 1999 shall be updated on a regular basis in conjunction 407 408 with policy revisions to the RWSP. 409 Ordinance 15384 was introduced on 11/7/2005 and passed by the Metropolitan King County Council on 3/13/2006, by the following vote: Yes: 9 - Mr. Phillips, Mr. von Reichbauer, Ms. Lambert, Mr. Dunn, Mr. Ferguson, Mr. Gossett, Ms. Hague, Ms. Patterson and Mr. Constantine No: 0 Excused: 0 KING COUNTY COUNCIL KING COUNTY, WASHINGTON ATTEST: Anne Noris, Clerk of the Council Ron Sims, County Executive Attachments None