



**BOARD OF COUNTY COMMISSIONERS
WARREN COUNTY, OHIO**

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**TOM ARISS
PAT ARNOLD SOUTH
DAVID G. YOUNG**

**BOARD OF COUNTY COMMISSIONERS
WARREN COUNTY, OHIO**

MINUTES: Regular Session – September 4, 2014

The Board met in regular session pursuant to adjournment of the September 2, 2014, meeting.

Pat Arnold South - present

Tom Ariss - present

David G. Young - present

Tina Osborne, Clerk - present

- 14-1362 A resolution was adopted to designate Family and Medical Leave of Absence to Tiffany Zindel, Deputy County Administrator, within the Office of Management and Budget. Vote: Unanimous
- 14-1363 A resolution was adopted to approve and authorize the President and/or Vice President of this Board to sign Amendment #1 of the Cooperation Agreement with various Communities in regards to the Community Development Block Grant Entitlement for Program Years 2015-2017. Vote: Unanimous
- 14-1364 A resolution was adopted to enter into an Exclusive and Permanent Drainage Easement with Imogene Turner for the King Avenue Improvement Project. Vote: Unanimous
- 14-1365 A resolution was adopted to authorize President of the Board to enter into Agreement with the City of Springboro relative to Building Inspection Services. Vote: Unanimous
- 14-1366 A resolution was adopted to acknowledge receipt of August 2014 Financial Statement. Vote: Unanimous

- 14-1367 A resolution was adopted to approve a Street and Appurtenances Bond Reduction for VWC Holdings, Ltd. for completion of Performance of construction of improvements for the Villages of Winding Creek, The Boulevards at Winding Creek, Section Three situated in Clearcreek Township. Vote: Unanimous
- 14-1368 A resolution was adopted to approve Appropriation Decreases within various Funds. Vote: Unanimous
- 14-1369 A resolution was adopted to approve Appropriation Adjustments from Commissioners General Fund #101-1110 into Detention – Sheriff’s Fund #101-2210. Vote: Unanimous
- 14-1370 A resolution was adopted to approve Appropriation Adjustment within the Auditor’s Office Fund #101-1120. Vote: Unanimous
- 14-1371 A resolution was adopted to approve Appropriation Adjustments within Prosecutor Fund #101-1150. Vote: Unanimous
- 14-1372 A resolution was adopted to approve Appropriation Adjustment within Recorder’s Office Fund #101-1160. Vote: Unanimous
- 14-1373 A resolution was adopted to approve Appropriation Adjustment within Motor Vehicle Fund #202. Vote: Unanimous
- 14-1374 A resolution was adopted to approve Appropriation Adjustments within Children Services Fund #273 and Treasurer’s Office Fund #101-1130. Vote: Unanimous
- 14-1375 A resolution was adopted to authorize payment of Bills. Vote: Unanimous
- 14-1376 A resolution was adopted to close Public Hearing for Rezoning Application of David J. Brausch (Case #2014-05), to Rezone 95.68 acres from Rural Residence “R-1” to Rural Residence “R-1” with a Planned Unit Development in Washington Township and render a decision September 23, 2014, at 9:05a.m.
Vote: Unanimous

DISCUSSIONS

On motion, upon unanimous call of the roll, the Board accepted and approved the consent agenda.

Rick Murray and Jim Bolen, Emergency Services Department, were present along with the principal of Little Miami Junior High and the Little Miami Public Information Officer to recognize Alice Yolanda, a 6th grader at Little Miami for winning the Severe Weather Awareness Poster Contest through the Ohio Department of National Resources.

Dave Gully, County Administrator, informed the Board that the Village of Harveysburg would like to amend their CDBG Project to include the evacuation of a grinder pump and the utility lines associated with the grinder pump which would require a change order and the need for an additional \$4305 allocation to the project.

Mr. Gully explained that the funding for this change order is available due to other CDBG project within the same funding year having unutilized allocation.

Upon discussion, the Board stated their agreement to reallocate the required funds to the Village of Harveysburg CDBG Project.

PUBLIC HEARING

REZONING APPLICATION OF DAVID BRAUSCH TO REZONE 95.68 ACRES IN WASHINGTON TOWNSHIP FROM RURAL RESIDENCE R1 TO RURAL RESIDENCE R1 AS A PLANNED UNIT DEVELOPMENT

The public hearing to consider the rezoning application of David J. Brausch, owner of record (Case #2014-05), to rezone 95.68 acres (Parcel Number 14163000200) located at 1715 Gum Grove Road in Washington Township from Rural Residential "R1" to Rural Residence "R1" with a Planned Unit Development was convened this 4th day of September 2014, in the Commissioners' Meeting Room.

Commissioner South opened the public hearing by reading aloud the resolution that established the time and date of the hearing, introducing the Board of Commissioners and staff and requested those in attendance to consider designating a spokesperson for the proponents and opponents if possible.

Michael Yetter, Zoning Supervisor, reviewed the background information on how this case became a rezoning application. He then presented a PowerPoint presentation (attached) showing the property location, size, current land use map designation, existing land use and the requested land use and permissions.

Mr. Yetter reviewed the Regional Planning Commission (RPC) Executive Committee recommendation to approve the rezoning application with conditional and the Rural Zoning Commission's decision to deny the application. He then acknowledged receipt of the various correspondences in favor of or in opposition to the rezoning application.

Commissioner Young requested clarification of the exact number of acres being requested for rezoning.

David Brausch, applicant, stated that the actual composting site is approximately 11 acres but because of the buffer area, the Regional Planning Commission suggested that the entire parcel be included in the planned unit development area in order to give more control of the entire parcel. He then stated that the Regional Planning Commission recommended approval of the planned unit development (PUD) over the entire 95+ acres with 14 conditions.

Stan Williams, RPC Executive Director, further clarified that the request is for one (1) PUD over the entire parcel with the composting process being limited to approximately 11 acres.

David Brausch presented Petitioners Exhibit A which includes documents from the following:

Ohio EPA
ODNR
Warren County Farm Bureau
Warren County Soil and Water
ODA
Warren County Zoning Office
Ohio Agribusiness Association
Warren County Ohio Horse Council
National Weather Services Forecast Office (Wilmington Ohio)
Rumpke
Warren County Auditor
Cornell University
San Diego State University
California Health Bioaerosols and Composting
Generation Dispersion Airborne Micro Compost
Warren County Health Department

Mr. Brausch then presented the attached PowerPoint presentation which included his background, how he began composting and how he came about and what was required in obtaining a Level 2 (Class 2) composting license from the EPA.

Mr. Brausch presented background information on how he began in the horse recovery operations at his composting facility as well as the need for this type of service to the community.

Mr. Brausch acknowledged the odor problem from his facility stating that the foul odors began when he began accepting food waste. He acknowledged several violations from the EPA resulting from the acceptance of food waste and then stated that he is no longer accepting food waste.

Mr. Brausch stated his desire to continue to compost approximately 20,000 tons in order to allow him to create fertilizer for his acreage plus an additional 1000 acres. He stated he would consider downsizing to a Class 3 EPA license but the horse carcass composting requires a Class 2 and he feels this is a valuable public service.

Mr. Brausch then reviewed the efforts he has made to minimize the impact of his business on his neighbors and stated his desire to work with the community.

Ruth Campbell, WYCO Engineering, discussed the technical aspects of the site plan presented and explained how they propose to control runoff with a retention pond.

Jack Van Kley, attorney for Mr. Brausch, stated that he was hired to assist Mr. Brausch with the environmental issues with the OEPA and to advise him on the zoning issues. He stated he has been practicing law for 35 years and has never seen the collaboration with neighbors like Mr. Brausch has done.

Mr. Van Kley then addressed the agricultural issue of the operation and stated his hopes to not go through the legal system on this matter. He stated that Mr. Brausch did not believe he was required to rezoning the property due to the agricultural nature of composting but desires to work with Warren County.

Mr. Van Kley then stated the proposed RPC recommended condition that would require Mr. Brausch to operation in a manner that creates no odor is not possible. He stated that they can require to operation with no nuisance odor but it is not possible to operate with no odor at all.

Mr. Van Kley then stated that the applicant agrees to not accept food waste as permitted with a Class 2 license.

Mr. Brausch clarified that a Class 2 license requires financial assurances to the community.

Commissioner South then opened the floor to proponents.

Bob Brausch, 1621 Gum Grove Road, read aloud a letter from his daughter in favor of approval of the rezoning application.

PJ Hughes, SR 22 & 3 resident spoke in favor of the rezoning application and cited a San Diego State University Study relative to odor from a composting facility.

Scott Hagemeyer, 10698 Wilmington Road, clarified that he is speaking as a Washington Township citizen and not a Washington Township Trustee, stated his support of the rezoning application and clarified that the Washington Township Trustees would support whatever decision of the Board of Commissioners.

Ben Pitkins, farm owner in Salem Township, spoke in favor of the rezoning application.

Herb Mayer, adjacent property owner, stated that he is the most affected by this operation and stated he does not feel threatened. He then stated Mr. Brausch is fixing the odor and spoke in favor of the rezoning application.

John Brausch, SR 350 resident stated that his farm has not had to purchase commercial fertilizer for six years and the fertilizer Mr. Brausch provides caused lower phosphates preventing algae bloom.

Commissioner South then opened the floor to opponents.

Dennis Ripp, 10005 Old 3C Highway, presented a petition in opposition to the rezoning application. He then stated he has been filing odor complaints with the OEPA since 2009. He then reviewed reasons why the Board of Commissioner should not approve the rezoning.

Chris Holz, Indian Lakes Subdivision resident, spoke representing adjacent property owners and area residents in opposition to the rezoning application. He stated that the community is up in arms because of this business and the foul odors are affecting their way of life. He then stated that the area creek turned black because of the operation and the inability of residents to enjoy the outdoor on their property is not longer possible for extended lengths of time.

There was discussion relative to the creek turning black due to runoff.

Jeff Thomas, Soil and Water Conservation District, stated they received telephone calls during peak odor incidents.

Don Norman, Soil and Water Conservation District, stated he reviewed the stream in question and did not see any blackness in the creek. He stated there was a faint odor in the air but no blackness.

Mr. Holz then stated that the residents are begging the Board to not allow this facility to destroy their property values and the marketability of their homes by changing this zoning. He then stated that by denying this application, the Board would be sending a message to the OEPA.

Michael Dixon, Fischer Road resident, stated his experiences with the lack of affects the composting facility is having on the streams and fishing in the area and spoke opposition to Mr. Holz's statements.

Wanda Bennett, US Route 22 & 3 resident, requested the Board review the website for Mr. Brausch's business which, in her opinion, proves that he is operating as a business and not an agricultural use. She then stated his disappointment in the OEPA for pushing Mr. Brausch into a Class 2 license.

Susan Trutner, 9171 US Route 22 & 3 resident, reiterated the noxious smell Mr. Brausch's facility is causing and stated the area quality of life is suffering because of it. She then stated her opinion that this is an experimental business that is failing miserably all over the State of Ohio.

Bob Johnson, US Route 22 & 3 resident, stated he has been a resident of the area for 46 years. He questioned the need for a composting landfill. He stated he would understand if this was the only location for the site but there are other properties that are more properly zoned and located outside of a residential area for this type of operation and requested Mr. Brausch relocate in one of those locations. He stated that Mr. Brausch and his family are personal friends and his statement is nothing personal against them. He then stated his concern relative to the road access and condition and the requirement of taxpayers' dollars to repair damage caused by the heavy trucks accessing his facility.

Dennis Hermann, area resident, stated that the County should consider composting the horse carcasses at the Warren County Fairgrounds.

Commissioner Ariss stated that they have been presented a lot of information to review and understand and desire to close the public hearing and render a decision at a later date.

Bruce McGary, Assistant Prosecutor, stated that once the public hearing is closed they have 20 days to render a decision.

Commissioner Young stated he now has a better understanding of what is going on and is appreciative that the citizens recognize that Mr. Brausch is not a "bad guy". He then stated that zoning rules are in place for a reason and citizens must follow the law. He then stated his agreement to review the information and make a decision at a later date.


Upon further discussion, the Board resolved (Resolution #14-1376) to close the public hearing and render a decision on September 23, 2014, at 9:05 a.m.

Upon motion the meeting was adjourned.



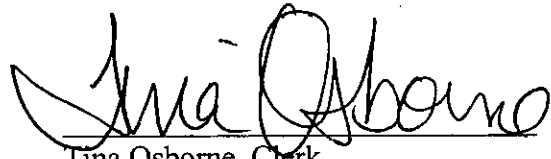
Pat Arnold South, President

David G. Young



Tom Ariss

I hereby certify that the foregoing is a true and correct copy of the minutes of the meeting of the Board of County Commissioners held on September 4, 2014, in compliance with Section 121.22 O.R.C.

A handwritten signature in black ink, appearing to read "Tina Osborne", written over a horizontal line.

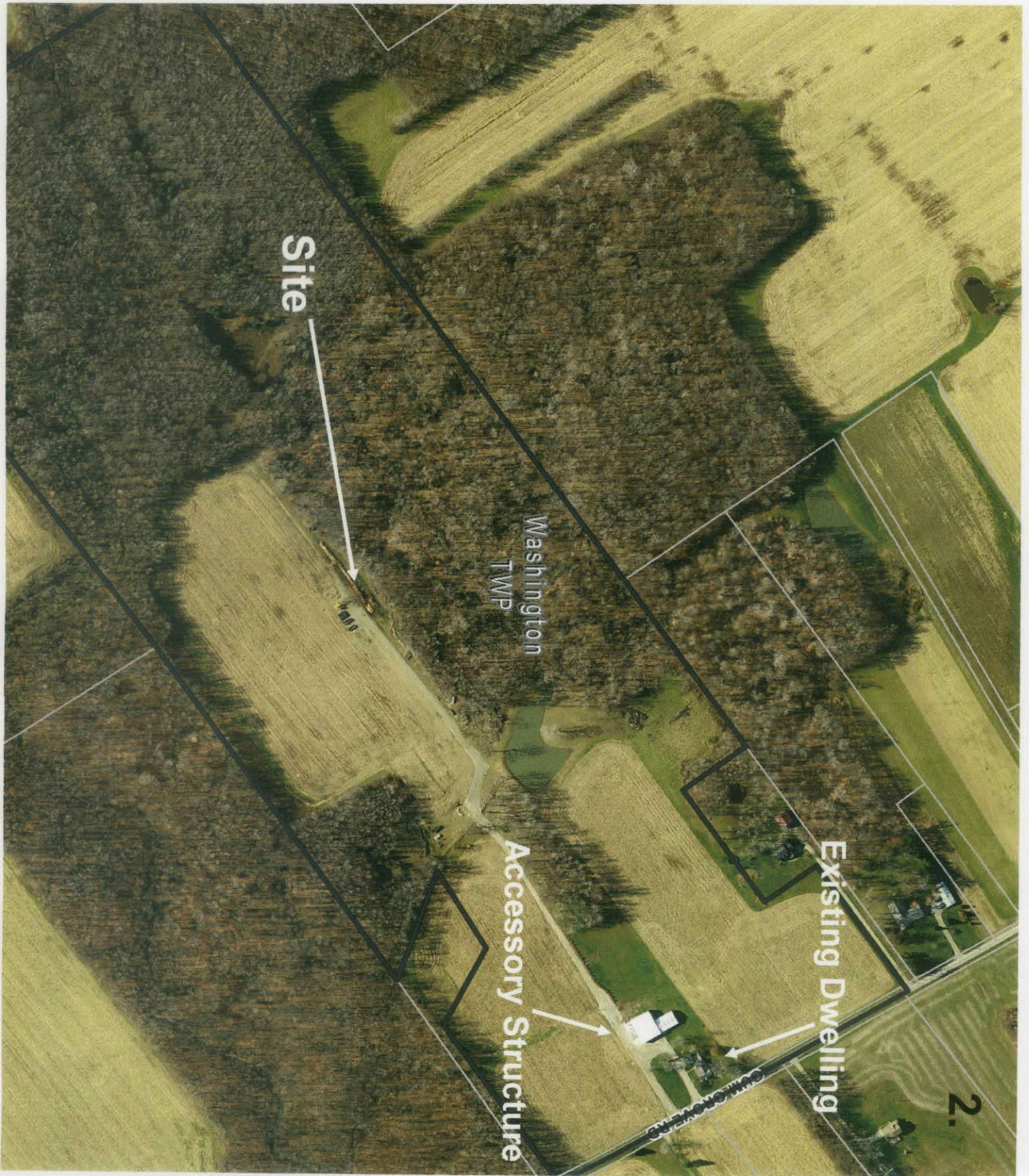
Tina Osborne, Clerk
Board of County Commissioners
Warren County, Ohio

Case No.	2014-05	1.
Applicant/Owner Agent	David J. Brausch	
Township	Washington	
Property Location	Address	1715 Gum Grove Rd. Clarksville, Oh. 45113
	Legal	Same
	PIN	14-16-300-020-0
Property Size	95.68 acres	Road Frontage 1098' ft.
Future Land Use Map (FLUM) Designation	Agricultural/Vacant Rural-Residential	
Current Zoning District	"R1" Single Family Residential (2 acre density)	
Proposed Land Use & Use Permission	"R1" Single Family Residential W/PUD Planned Unit Development	
Existing Land Use	Single Family Residential and Agricultural/Vacant	

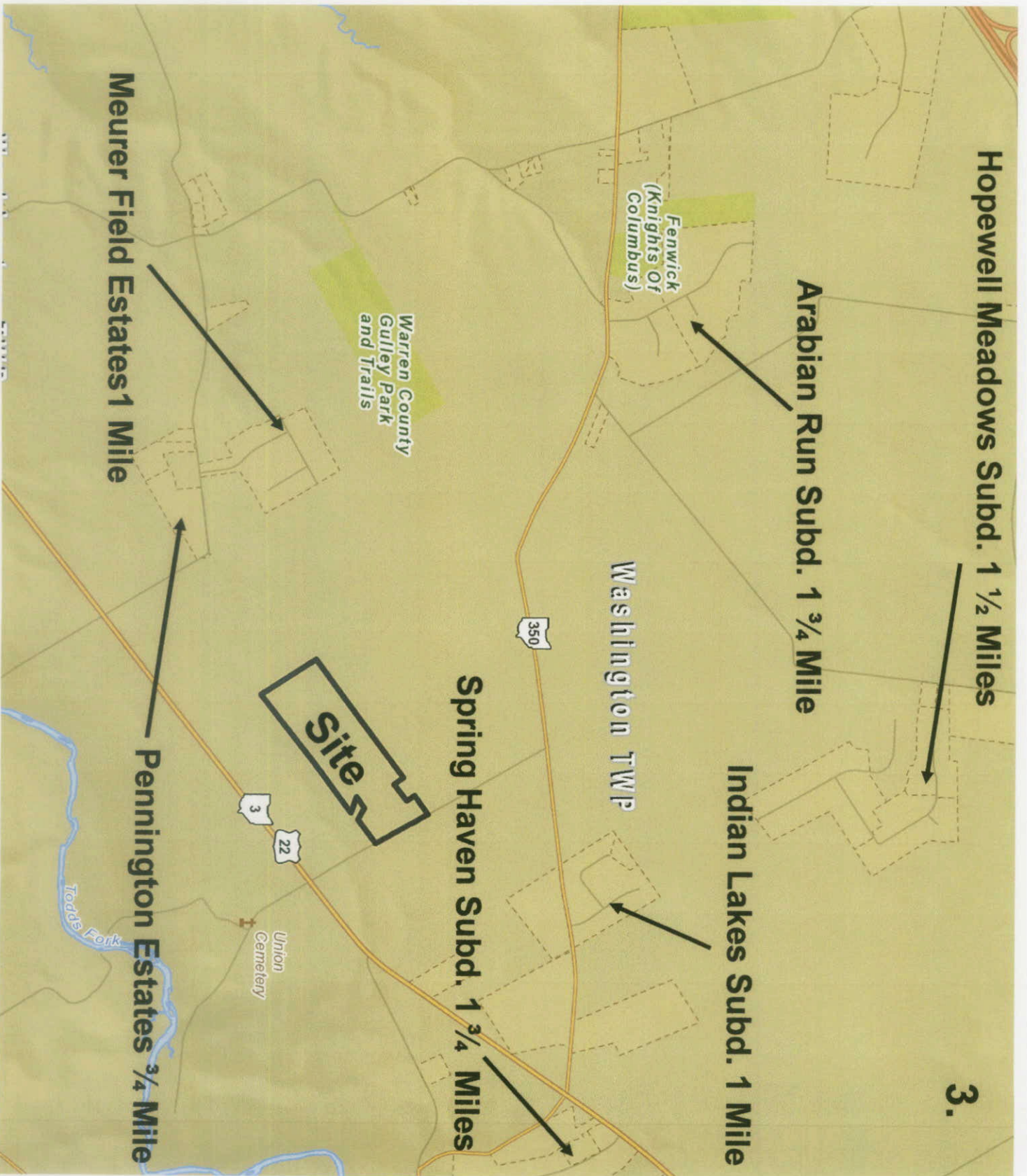
Aerial Map

2014-05

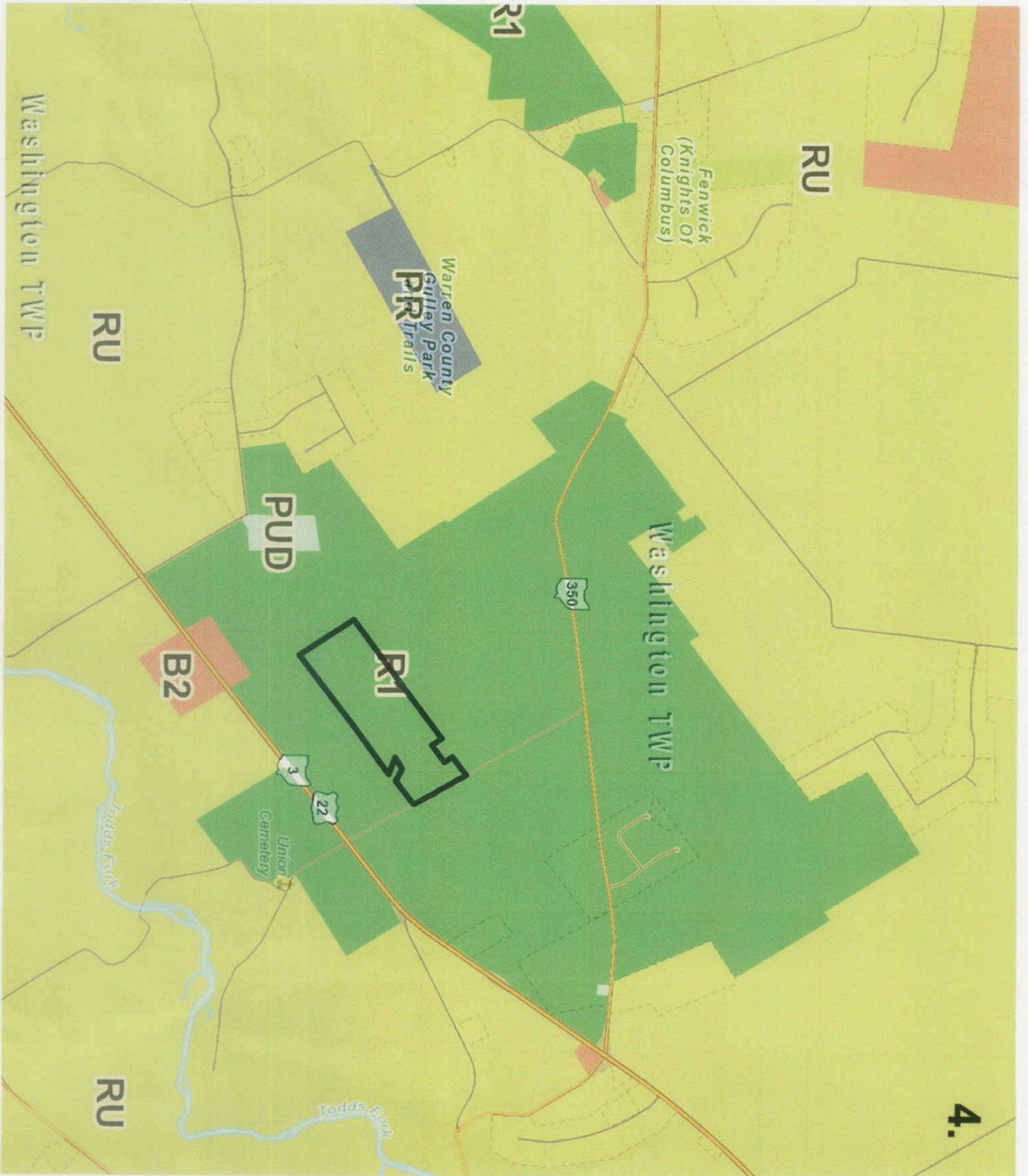
14-16-300-020-0



Vicinity Map 2014-05 14-16-300-020-0



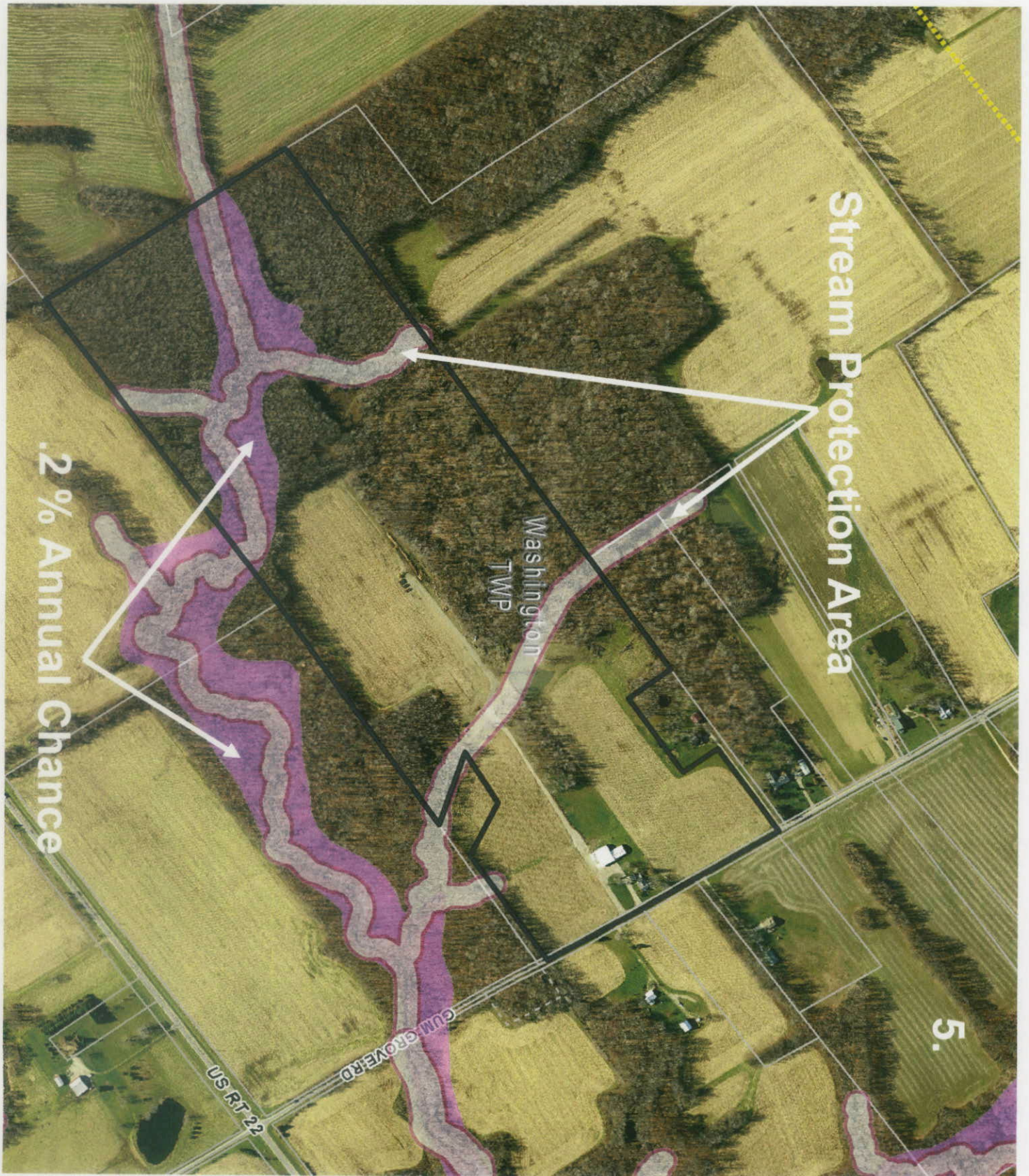
Zoning Map 2014-05 14-16-300-020-0



Flood Map

2014-05

14-16-300-020-0





Comprehensive Plan - Land Use Element

Notes:

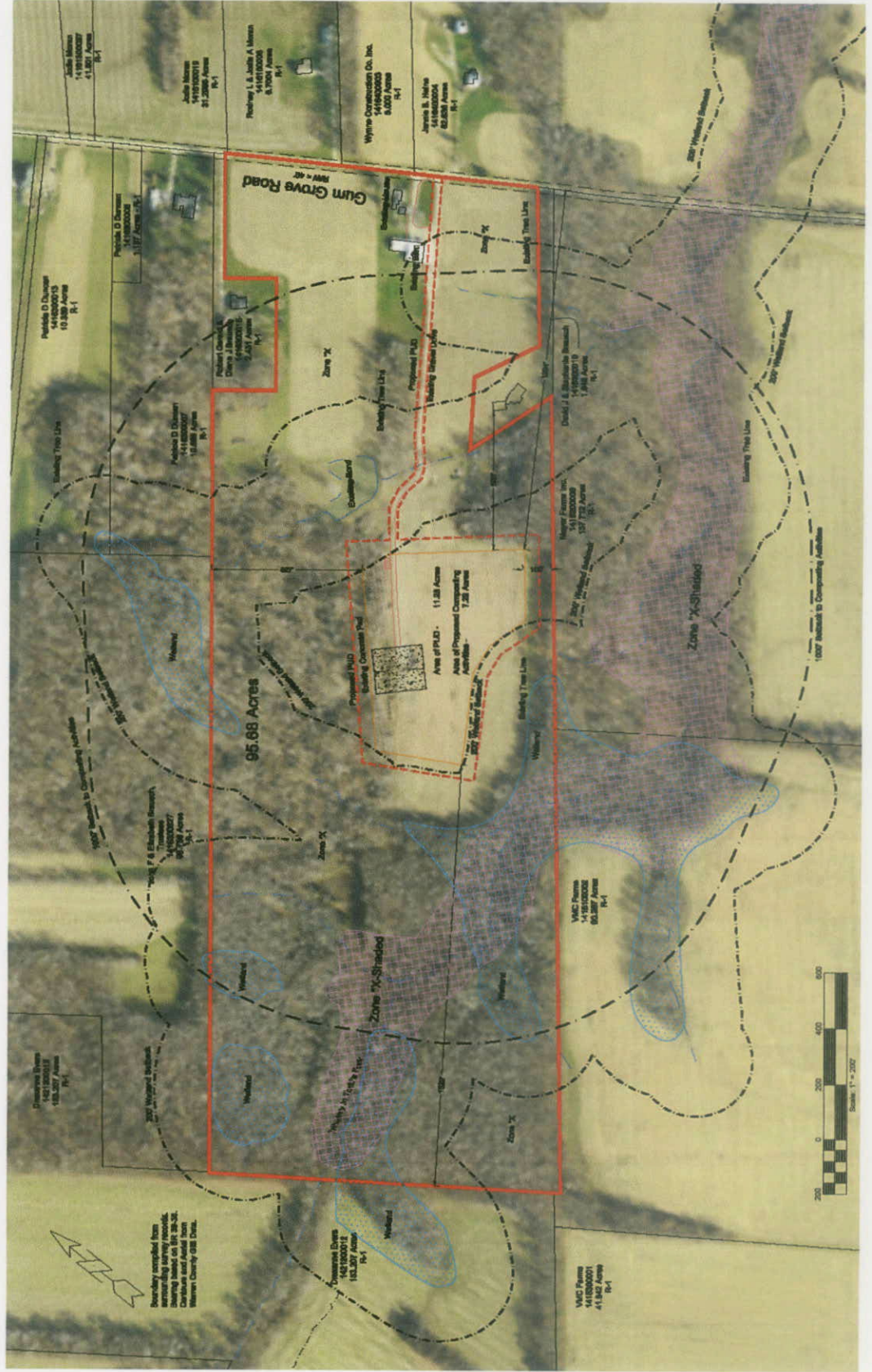
- 1) The Brausch Composting Facility PUD spokesperson and agent shall be:
Dave Brausch
1715 Gum Grove Road
Clarksville, OH 45113
- 2) Zoning:
Existing zoning of Parcel is R-1.
Adjacent properties as shown herein.
- 3) Land:
Proposed zoning is R-1 (PUD)
Existing land use is residential, agriculture, and agriculture support.
Proposed land use is Class II Composting, agriculture, and agriculture support.
- 4) Utilities:
Water - On-site
Sewer - On-site
Electric - DWSL
Phone - Frontier North
- 5) Area of PUD is 11.28 acres.
Area of Composting is 7.29 Acres
- 6) Per FIRM 39165C0170E the property comprising the proposed PUD is identified as Zone "X". Areas outside of the 0.2% (500 year) chance of flooding or as Zone "X-Shaded" areas outside of the 1.0% (100 year) chance of flooding but inside the 0.2% (500 year) chance of flooding as shown herein.
- 7) The following operations shall be confined to the area designated "Area of Proposed Composting Activities":
Active composting piles
Mature composting piles
Storage of mulch and other cover materials
- 8) Maximum volume of material permitted per OEPA per day is 100 tons.
Maximum Pile Height - 40'

BRAUSCH COMPOSTING FACILITY

STAGE I PUD 11.28 ACRES
VMS IS25
WASHINGTON TOWNSHIP, WARREN COUNTY, OHIO



SHEET INDEX	DESCRIPTION
1	PARCEL MAP
2	ADJACENT PROPERTIES
3	DETAIL OF PUD AREA
EXISTING TOPO	



BRAUSCH COMPOSTING FACILITY

STAGE I PUD 11.28 ACRES
VMS 1525
WASHINGTON TOWNSHIP, WARREN COUNTY, OHIO

John F & Elizabeth Brausch,
Trustees

1416300027
98.796 Acres
R-1

N 50°39'13" E 2813.08'

Patricia D Duncan
1416300007
10.596 Acres
R-1

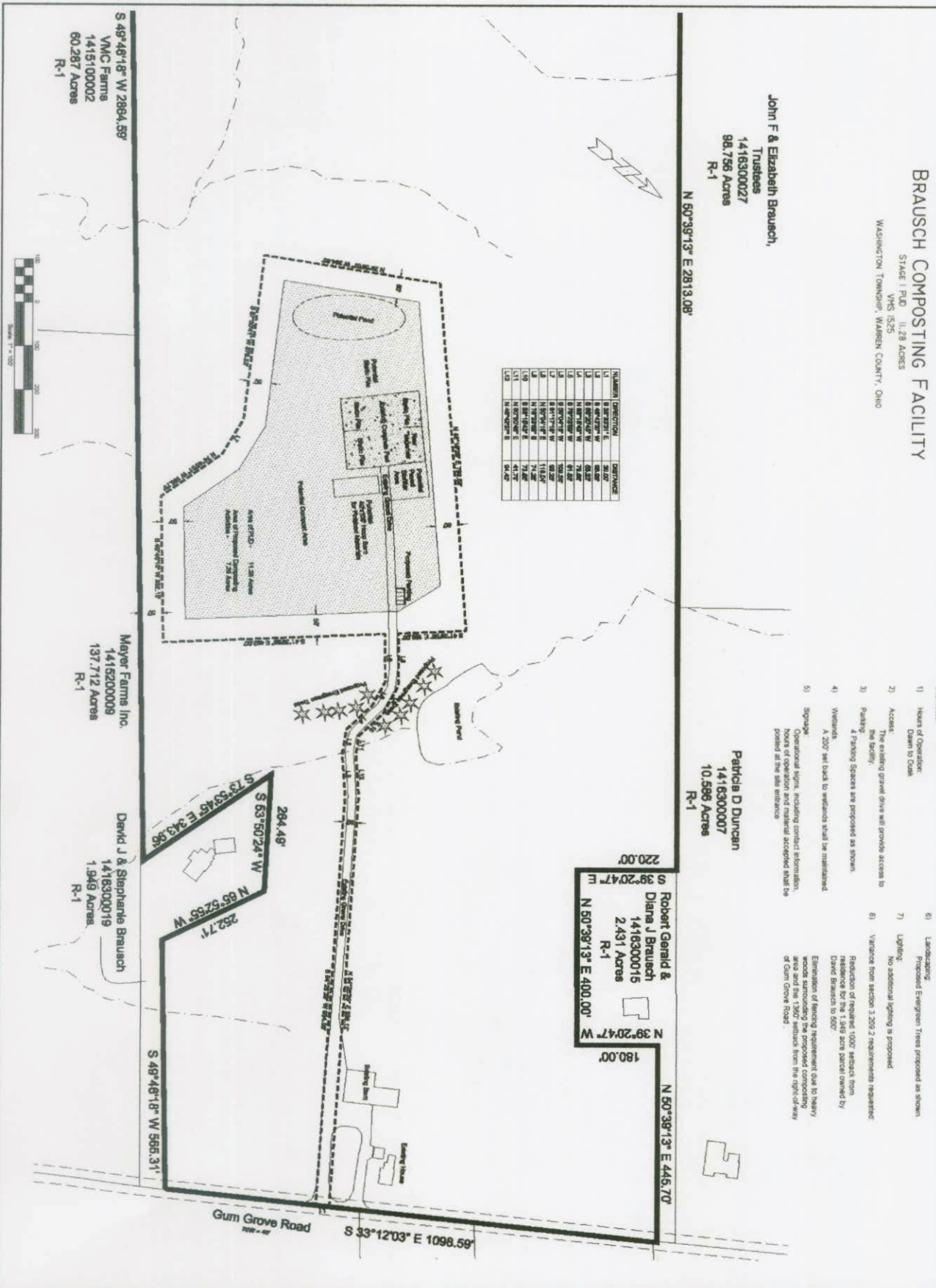
**Robert Gerald &
Diana J Brausch**
1416300015
2.431 Acres
R-1
N 39°20'47" E 220.00'
S 39°20'47" E
N 50°39'13" E 400.00'

S 49°46'18" W 2864.59'
VMC Farms
1415100002
60.287 Acres
R-1

Moyer Farms Inc.
1415200009
137.712 Acres
R-1

David J & Stephanie Brausch
1416300019
1.949 Acres
R-1

NUMBER	DESCRIPTION	DISTANCE
1	TO CORNER E	28.00'
2	TO CORNER W	81.82'
3	TO CORNER N	71.42'
4	TO CORNER S	71.42'
5	TO CORNER E	28.00'
6	TO CORNER W	81.82'
7	TO CORNER N	71.42'
8	TO CORNER S	71.42'
9	TO CORNER E	28.00'
10	TO CORNER W	81.82'
11	TO CORNER N	71.42'
12	TO CORNER S	71.42'
13	TO CORNER E	28.00'
14	TO CORNER W	81.82'
15	TO CORNER N	71.42'
16	TO CORNER S	71.42'
17	TO CORNER E	28.00'
18	TO CORNER W	81.82'
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20	TO CORNER S	71.42'
21	TO CORNER E	28.00'
22	TO CORNER W	81.82'
23	TO CORNER N	71.42'
24	TO CORNER S	71.42'
25	TO CORNER E	28.00'
26	TO CORNER W	81.82'
27	TO CORNER N	71.42'
28	TO CORNER S	71.42'
29	TO CORNER E	28.00'
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36	TO CORNER S	71.42'
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40	TO CORNER S	71.42'
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49	TO CORNER E	28.00'
50	TO CORNER W	81.82'
51	TO CORNER N	71.42'
52	TO CORNER S	71.42'
53	TO CORNER E	28.00'
54	TO CORNER W	81.82'
55	TO CORNER N	71.42'
56	TO CORNER S	71.42'
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63	TO CORNER N	71.42'
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66	TO CORNER W	81.82'
67	TO CORNER N	71.42'
68	TO CORNER S	71.42'
69	TO CORNER E	28.00'
70	TO CORNER W	81.82'
71	TO CORNER N	71.42'
72	TO CORNER S	71.42'
73	TO CORNER E	28.00'
74	TO CORNER W	81.82'
75	TO CORNER N	71.42'
76	TO CORNER S	71.42'
77	TO CORNER E	28.00'
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80	TO CORNER S	71.42'
81	TO CORNER E	28.00'
82	TO CORNER W	81.82'
83	TO CORNER N	71.42'
84	TO CORNER S	71.42'
85	TO CORNER E	28.00'
86	TO CORNER W	81.82'
87	TO CORNER N	71.42'
88	TO CORNER S	71.42'
89	TO CORNER E	28.00'
90	TO CORNER W	81.82'
91	TO CORNER N	71.42'
92	TO CORNER S	71.42'
93	TO CORNER E	28.00'
94	TO CORNER W	81.82'
95	TO CORNER N	71.42'
96	TO CORNER S	71.42'
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98	TO CORNER W	81.82'
99	TO CORNER N	71.42'
100	TO CORNER S	71.42'

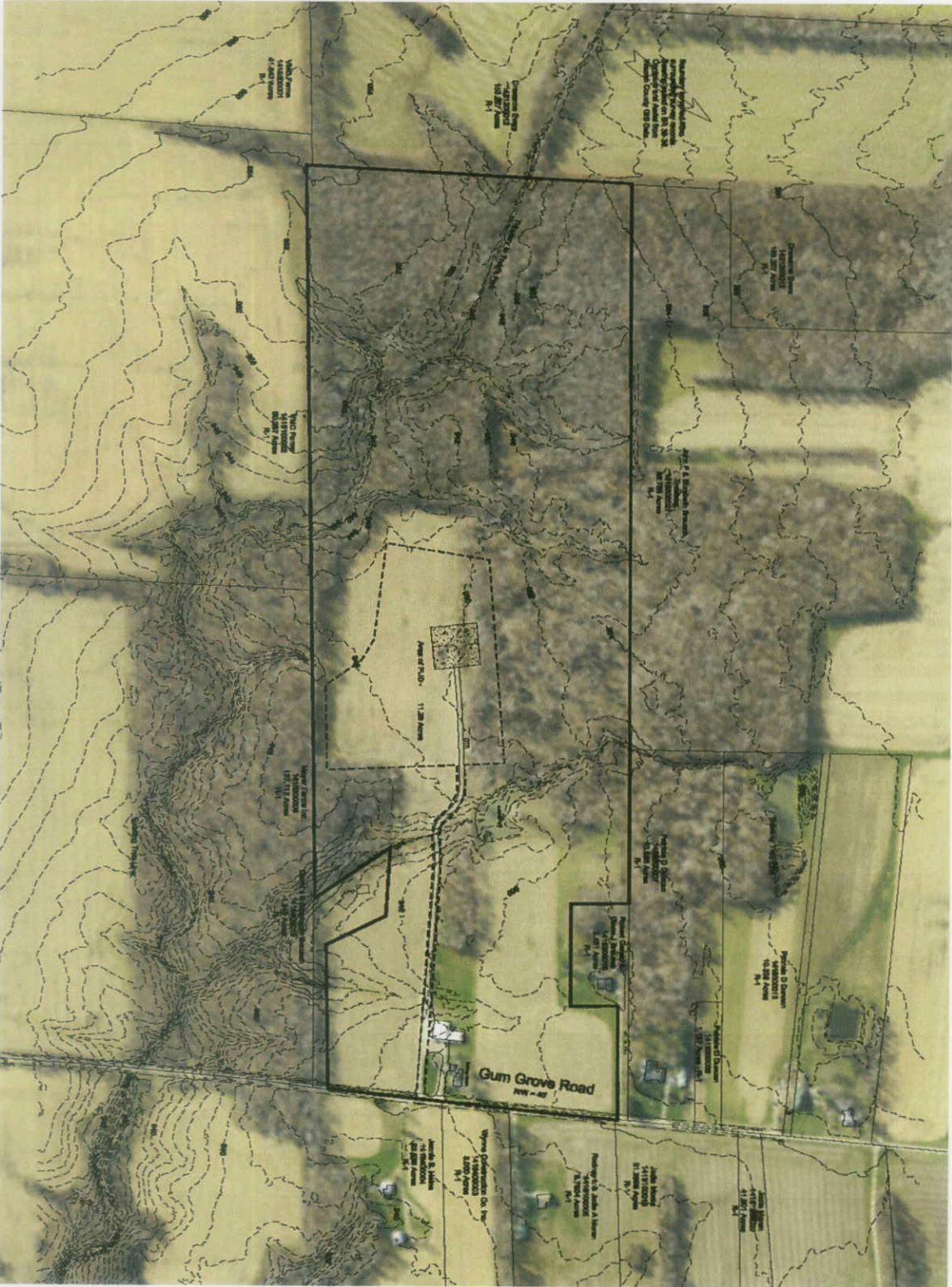


- Site Notes**
- Hours of Operation: Dawn to Dusk
 - Access: The existing gravel drive will provide access to the facility.
 - Parking: 4 Parking Spaces are proposed as shown.
 - Wetlands: A 200' wet back to wetlands shall be maintained.
 - Storage: Seasonal storage, including contact information, hours of operation and email addresses shall be posted at the site entrance.
 - Landscaping: Proposed Evergreen Trees proposed as shown.
 - Lighting: No additional lighting is proposed.
 - Variance from section 1,209.2 requirements requested: Reduction of required 1000' setback from residence for this 1.949 acre parcel owned by David Brausch to 500'. Evaluation of fencing requirement due to heavy woods surrounding the proposed composting area and the 1500' setback from the right-of-way of Gum Grove Road.

<p>DATE: 02/22/09</p> <p>PROJECT: BRAUSCH COMPOSTING FACILITY</p> <p>STAGE I PUD 11.28 ACRES ACRES</p> <p>PART OF VMS 1525</p> <p>WASHINGTON TOWNSHIP, WARREN COUNTY, OHIO</p>	<p>REVISIONS:</p> <table border="1"> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> </table>													<p>WYCO CONSULTING, INC. Civil Engineering - Surveying - Land Development 10 Stadia Drive Franklin, Ohio 43005 937-743-9926</p>	<p>SCALE: 1"=50'</p> <p>VERT. SCALE: 1"=5'</p> <p>DESIGNED BY: NC</p> <p>DRAWING NO.: 1771</p> <p>PROJECT NO.: 1771</p> <p>FILED: 2/22/09</p>
<p>2</p> <p>3</p>															

BRAUSCH COMPOSTING FACILITY

STAGE 1 PUD 11.28 ACRES
 VMS 1525
 WASHINGTON TOWNSHIP, WARREN COUNTY, OHIO

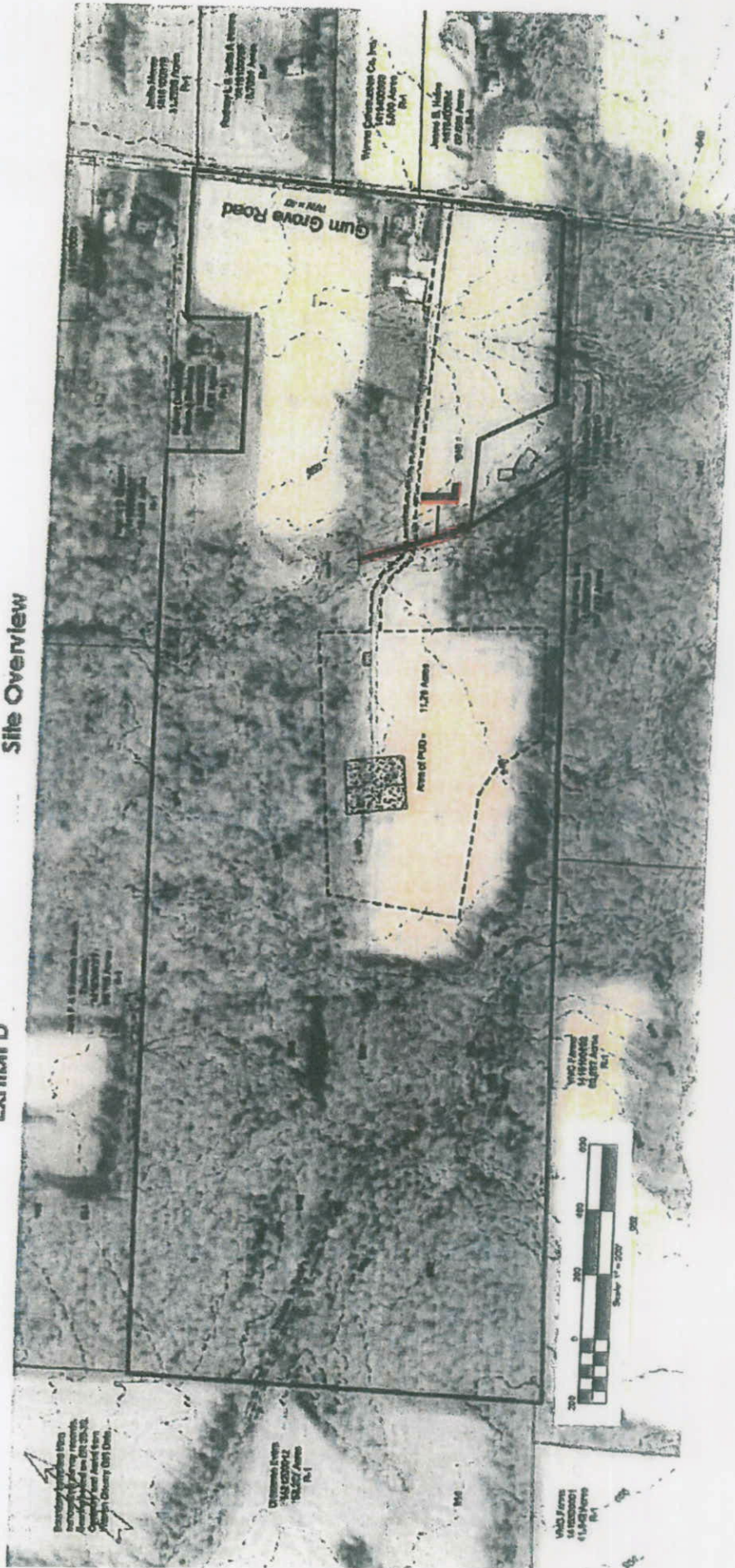


<p>3</p>	<p>PROJECT</p> <p>BRAUSCH COMPOSTING FACILITY STAGE 1 PUD 11.28 ACRES PART OF VMS 1525 WASHINGTON TOWNSHIP, WARREN COUNTY, OHIO</p>	<p>REVISIONS</p> <p>02/23/2014 PUD Area Revised, Detail Added</p>	<p>WYCO CONSULTING, INC. Civil Engineering - Surveying - Land Development 10 Stadia Drive Franklin, Ohio 45005 937-743-9926</p>
	<p>DATE: 09/02/14</p> <p>SCALE: 1"=200'</p> <p>DESIGNED BY: JAC</p> <p>DRAWN BY: JAC</p> <p>CHECKED BY: JAC</p> <p>PROJECT NO.: 1771</p> <p>DRAWING: TOPO MAP</p>		

Exhibit D

Exhibit D

Site Overview



BRAUSCH FARMS PROPOSED PUD

BRAUSCH FARMS PROPOSED PUD

OWNER DAVID BRAUSCH

- ✘ Graduate of Clinton Massie High School 89
- ✘ After three years in engineering at OSU switched major to Agricultural Systems Management when local farmer said he was going to retire.
- ✘ Graduated from OSU in 94
- ✘ Purchased current address of farm in 1994 on land contract

START IN COMPOSTING

- ✘ 2007 started composting and applying horse manure as way to increase organic matter and increase soil health
- ✘ Warren county fair board suggested that if I wanted to apply for muck removal contract I get a level 3 composting license.
- ✘ Approached EPA for license info early 09 and it was suggested we look at a level 2 in order to further food waste diversion initiative by state

APPLICATION PROCESS

- ✘ Took about six months
- ✘ Required certified letters to local agencies followed by 14 day waiting period for response
- ✘ Assumed I was ag exempt ORC 301
- ✘ ADWR established
- ✘ Site plan reviewed
- ✘ Financial assurance put in place

HORSE RECOVERY

- ✗ Asked by Dr Luken to look at it
- ✗ Gathered info from ODA, EPA, and OSU
- ✗ Two applications one to ODA and one to director of EPA
- ✗ Follow OSU guideline for composting
- ✗ Obtained permission to compost dear later

NEED FOR SERVICES

- ✘ horse industry
- ✘ 4th largest county in state
- ✘ Lebanon raceway/Racino
- ✘ Ripple effect
- ✘ Feed, hay and straw from farmers, etc
- ✘ Need waste removal and carcass
- ✘ Feed and Corn mills

NEED FOR COMPOST

- ✗ Agriculture not sustainable
- ✗ Soils are becoming a median
- ✗ Nutrients
- ✗ Infiltration
- ✗ Buffer
- ✗ Natural Innoculant
- ✗ Earthworms

GETTING FROM A TO B

- ✘ Odor
- ✘ Water quality
- ✘ Air quality
- ✘ Property values
- ✘ Zoning
- ✘ Accountability

ODOR

- ✘ Driven by moisture and improper c/n ratio
- ✘ In my case was driven by food waste
- ✘ Excessive snow/rainfall
- ✘ 2012 c/n 25 2013 c/n 15
- ✘ Food waste amounts
- ✘ Pwd no more foodwaste
- ✘ Drier materials levels logged

ODORS

- ✘ Receiving barn 3000 yards
- ✘ Stabilize moisture and c/n
- ✘ In barn 21 to 25 days
- ✘ Turned twice
- ✘ Moved outside 21 days moved to right
- ✘ Curing stage
- ✘ Roughly 10000 yards outside
- ✘ Weather patterns/mist on screener

WATER QUALITY

- ✘ Site plan (Ruth)
- ✘ Soil and Water Conservation oversight
- ✘ Hoop barn

AIR QUALITY

- ✘ I looked at two studies and had risk assessment professional look at Cornell Study
- ✘ Charged OEPA they looked at several studies
- ✘ Warren County Health Dpt
- ✘ Hamilton County Air Quality
- ✘ Biohazards disperse quickly
- ✘ Bacteria testing mpn/g

PROPERTY VALUES

- ✗ 5 sales on gum grove in last year
- ✗ Not a good market for high end homes
- ✗ Large land owners

ZONING

- ✘ Cover Letter
- ✘ Early Stages ORC test
- ✘ Using own carbon source
- ✘ Ambiguous
- ✘ PUD good for county more control
- ✘ Many organizations weighing in