

BEFORE THE METRO COUNCIL

AUTHORIZING THE CHIEF OPERATING ) RESOLUTION NO. 07-3766A  
OFFICER TO PURCHASE PROPERTY WITH )  
ACCEPTED ACQUISITION GUIDELINES ) Introduced by Chief Operating Officer  
AS OUTLINED IN THE NATURAL AREAS ) Michael J. Jordan, with the  
IMPLEMENTATION WORK PLAN ) concurrence of Council President  
 ) David Bragdon

WHEREAS, in May 1995 regional voters approved a \$135.6 million Open Spaces, Parks and Streams bond measure (“1995 Open Spaces Bond Measure”); and

WHEREAS, In November 2006 regional voters approved a \$227.4 million Natural Areas Bond Measure (“2006 Natural Areas Bond Measure”); and

WHEREAS, in Resolution No. 95-2228A the Metro Council approved the Open Spaces Implementation Work Plan, “For the Purpose of Authorizing the Executive Officer to Purchase Property with Accepted Acquisition Guidelines as Outlined in the Open Spaces Implementation Work Plan.” This work plan, including amendments by Resolution No. 96-2424, “For the Purpose of Authorizing the Executive Officer to Purchase Property with Accepted Acquisition Guidelines as Outlined in the Amended Open Spaces Implementation Work Plan,” and Resolution 01-3106, “For the Purpose of Modifying the Open Spaces Implementation Work Plan and Open Spaces Acquisition Regional Target Area Refinement Plans to Direct Future Acquisitions of Properties that Satisfy Specific Identified Criteria,” provided the framework within which implementation activities for the 1995 Open Spaces Bond Measure and preliminary work for the 2006 Natural Areas Bond Measure have proceeded; and

WHEREAS, updates and revisions have been made to the Open Spaces Implementation Work Plan to reflect the experience of Metro and respond to changed market conditions and goals of the 2006 Natural Areas Bond Measure; and

WHEREAS, acquisition of natural areas from willing sellers continues to be a primary strategy for preservation of natural areas; and

WHEREAS, property to be acquired by these procedures shall be within target areas identified in the 2006 Natural Areas Bond Measure and further refined by target area-specific refinement plans and tax lot specific maps adopted by Metro Council; and

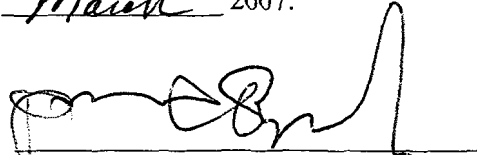
WHEREAS, a pre-approved set of criteria or conditions under which the Chief Operating Officer and his/her designees are authorized to negotiate and complete land acquisition transactions, related to the implementation of the 2006 Natural Areas Bond Measure are necessary; now therefore

/////

/////

BE IT RESOLVED THAT the Metro Council hereby authorizes the Chief Operating Officer to acquire real property and property interests subject to the requirements of the *Acquisition Parameters* and *Due Diligence Guidelines* of the Natural Areas Implementation Work Plan. A copy of the *Acquisition Parameters* and *Due Diligence Guidelines* are attached as "Exhibit A" and hereby incorporated by reference.

ADOPTED by the Metro Council this 15<sup>th</sup> day of March 2007.

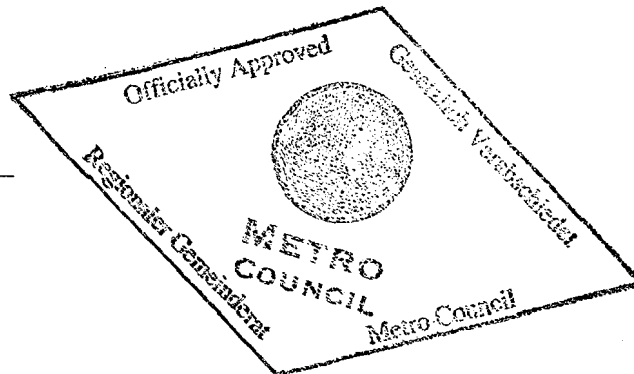


David Bragdon, Council President

Approved as to Form:



Daniel B. Cooper, Metro Attorney



NATURAL AREAS  
IMPLEMENTATION  
WORK PLAN

*Sections on Acquisition Parameters  
and Due Diligence Guidelines Only*



**METRO**

**REGIONAL PARKS AND GREENSPACES  
DEPARTMENT**

600 NE Grand Ave., Portland, OR 97232-2736 (503) 797-1850



## ACQUISITION PARAMETERS

### **Definition:**

"*Acquisition Parameters*" are the Council-approved criteria and conditions under which the Chief Operating Officer and his/her designees are authorized to negotiate and complete land acquisition transactions without further Council review and approval. The Chief Operating Officer and his/her designees may complete a land acquisition transaction that does not meet all of the *acquisition parameters* only with specific Council review and approval.

### **Rationale:**

The creation of pre-approved *acquisition parameters* will permit the agency to deal with willing sellers in a timely and business-like manner and allow the Council to focus on policy level issues.

### **Intent:**

Metro intends to pay no more than fair market value for property, it being acknowledged, however, that the Metro area real estate market is dynamic and the process of identifying fair market value is not exact. Metro's acquisition process should provide as much flexibility as possible to achieve the goals of the Natural Areas Bond Measure and to reflect the actual market conditions affecting the fair market value of properties targeted for natural areas acquisition.

### **Acquisition Parameters:**

The Metro Council authorizes the Chief Operating Officer and his/her designees to negotiate and close real estate transactions related to the 2006 Natural Areas Bond Measure provided all of the following criteria/conditions are met:

- The landowner is a willing seller.
- The property is identified on a Council-adopted target area "confidential refinement map."
- The Real Estate Negotiator and a stabilization team representative have inspected the property, they and the Natural Areas Manager have approved the purchase, and an acknowledgement of such visits and approvals has been completed (Appendix 1).
- If the property is identified as Agricultural Resource Land in the Refinement Plan adopted for the applicable target area, then Metro has complied with the Agricultural Resource Land Guidelines in this Work Plan, as specifically refined by the applicable Refinement Plan for the target area in which the property is located.

- The negotiated purchase price for the property is either:
  1. Equal to or less than the fair market value as established by the appraisal and appraisal review processes described below (note that Metro will actively solicit donations and bargain sales); or
  2. Not more than 10% or \$100,000, whichever is less, above such fair market value and the Chief Operating Officer has authorized acquisition of the property at such price after finding that acquisition of the property at the negotiated purchase price is in the “public interest”. In order to conclude that such a purchase is in the public interest, the Chief Operating Officer must conclude that:
    - The failure to acquire the property will significantly compromise Metro’s ability to achieve the goals described in the applicable adopted Refinement Plan for that target area; and
    - The purchase will not reduce the amount of funds available to purchase other critical, high priority target properties in a manner that will significantly compromise Metro’s ability to achieve the goals described in the applicable adopted Refinement Plan for that target area.

In addition, the Chief Operating Officer shall also consider the following factors before concluding that such a purchase is in the public interest:

- Whether there are immediate and known competing offers or other market pressures that put Metro at risk of permanently losing the opportunity to purchase and preserve the property unless Metro agrees to pay the negotiated purchase price; and
- Whether any other parties are making financial contributions toward the purchase price.

- **Appraisal**

An independent certified appraiser has completed an appraisal of the property that states a conclusion of the fair market value of the property or, if appropriate, a range of value. The appraisal may be in summary report format. The appraiser shall state in the appraisal any assumptions that he/she relied upon to determine the property’s fair market value; however, the appraisal shall not be based upon any “extraordinary assumptions” made by the appraiser that materially affect the property’s fair market value.

- **Appraisal Review**

A certified appraiser has completed a review of the appraisal if either (1) the property's purchase price is \$250,000 or more, or (2) the Metro Attorney determines, at his/her sole discretion, that such an appraisal review is appropriate under the circumstances of a particular proposed acquisition. Such appraisal review shall be completed in accordance with the Uniform Standards of Professional Appraisal Practice ("USPAP") and general appraisal standards and may include a determination of an acceptable range of value for the property by the review appraiser. If the review appraiser determines that the appraisal does not meet USPAP or other general appraisal standards, the review appraiser, after consultation with and at the direction of the Office of the Metro Attorney, may either (a) work with the appraiser to correct the deficiencies, (b) order a second appraisal to be reviewed in the manner set forth herein, or (c) make a final determination of the range of value for the property.

- "*Due diligence*" has been completed in conformance with the *due diligence* section of this Work Plan and no unusual circumstances have been found to exist.

#### **Notices and Reports to Council Regarding Completed Transactions**

The Natural Areas Bond Program Manager or his/her designees shall notify the Council promptly following the closing of any real estate transaction. The Chief Operating Officer or his/her designees shall prepare and present to the Council quarterly updates summarizing acquisition activity distinguished by target area.

## DUE DILIGENCE GUIDELINES

### Definition:

"*Due diligence*" is the systematic inspection of the legal title and physical condition of real property before that property is purchased to assure protection of public investment in natural area and trail properties. *Due diligence* should be conducted in advance of closing so that resolvable problems can be adequately addressed prior to closing.

### Components:

The primary areas of *due diligence* are described below. A more detailed list of items examined may be found in the Appendix under "Due Diligence and Closing Checklist." The Metro Attorney may amend the checklist as determined necessary and appropriate at his/her discretion.

The Due Diligence Team is comprised of the Real Estate Negotiator, Metro Attorney staff, and Stabilization Manager for each property.

- Appraisal: An appraisal of the property must be completed to determine the property's fair market value and provide other useful information about the property. The appraisal shall be in the format described in the previous section regarding *acquisition parameters* and shall be reviewed in the manner set forth therein.
- Examination of Title:
  1. Metro must satisfy itself that the property is the seller's to sell, that Metro understands what rights will be conveyed, that all parties necessary for the conveyance are involved, and that any rights that are not a part of the transaction will not defeat the purpose of the acquisition.
  2. *Due diligence* requires the review and inspection of the title report and related documents, including the deed to the current owner, recorded easements and other encumbrances, water rights, access rights, taxes, liens, etc.
  3. Other documents that need to be inspected include unrecorded leases with existing tenants or farmers, management agreements, records pertaining to personal property included in the sale, surveys, and agreements the seller may have entered into that may not be of record.
- Inspection of the Property:
  1. Location of Boundaries. *Due diligence* requires the review of any existing survey of the property. Absent a recent survey, Metro should identify the known or assumed property boundaries on site. If such boundary identification is not apparent, a



new survey will be conducted unless deemed unnecessary or uneconomical by the Due Diligence Team. Additionally, Metro must identify that both legal and physical access to the property exist and are usable. Legal and physical access by the public will be secured unless the nature of the property is such that access restrictions are acceptable for that property.

2. **Physical Inspection.** Metro or its contractors and agents must physically inspect the property for environmental assessment purposes and to identify possible hazards, unrecorded easements and trespassers, and to make a preliminary evaluation of the condition of any structures and improvements (roads, fences, utilities, etc.), which shall be further evaluated during the stabilization period (see section regarding *Stabilization and Land Stewardship, supra*). Any encroachments, potential property boundary disputes, or unrecorded use of the property identified either during property inspection or in title search will be resolved prior to closure unless deemed impractical by the Due Diligence Team and the Natural Areas Manager has authorized closing notwithstanding such circumstances(s).

3. **Environmental Review.** Metro shall contract with an environmental professional to conduct a Phase I Environmental Assessment in accord with the requirements of the federal All Appropriate Inquiries standards set forth in 40 CFR Part 312, ASTM Standard E1527-05, as that standard may be revised and updated, and in accord with applicable state of Oregon law and regulation, for the purpose of establishing the Innocent Landowner Defense pursuant to CERCLA section 101(35) and 107(b)(3). If the Phase I Environmental Assessment identifies environmental conditions indicative of releases or threatened releases of hazardous substances, pollutants, contaminants, petroleum and petroleum products and controlled substances, Metro shall contract with an Environmental Professional to conduct a Phase II Environmental Investigation, which may include soil and groundwater sampling and testing, in accord with ASTM Standards. The Chief Operating Officer may authorize the expenditure of Natural Area Program bond funds to remediate environmental contamination identified on a property by a Phase II Environmental Assessment provided that the Chief Operating Officer has concluded that (a) such expenditure is reasonable in relation to the purchase price and appraised value of such property, and (b) such expenditure will result in receipt of a "No Further Action" letter, or a substantial equivalent, from the Oregon Department of Environmental Quality or will substantially eliminate the probability of future environmental liability to Metro, based on information provided in the Phase II Environmental Assessment. If such expenditure successfully remediates an environmental condition identified in a Phase II Environmental Assessment then such condition shall no longer be considered an "unusual circumstance," as described in the following paragraph of this work plan.

- **Unusual Circumstances.** If, in the course of *due diligence*, the Due Diligence Team discovers any unusual deed or title restrictions, encumbrances, or environmental conditions that may prohibit or unduly restrict Metro's ability to use the property as a natural area or for a trail or that may create a liability to Metro, such restrictions, encumbrances, or conditions shall be considered "unusual circumstances." As provided in the section of this Work Plan regarding *acquisition parameters*, the Chief Operating

Amended Exhibit A to Resolution No. 07-3766A

Officer and his/her designees may not complete the purchase of a property with such unusual circumstances without obtaining the Metro Council's specific approval prior to such acquisition.

- Document Retention. Documents related to acquisitions shall be retained as determined appropriate by the Metro Attorney.

**DUE DILIGENCE AND CLOSING CHECKLIST**

Target Area: File No. \_\_\_\_\_

Seller:

Seller's Attorney/Representative:

Property address and/or tax lot designation:

County:

Refinement designation:

Real Estate Negotiator:

Acres:

Purchase Price:

Escrow Deposit: \$ \_\_\_\_\_; Delivered to Escrow Co. on \_\_\_\_\_

Option or Purchase and Sale Agreement?

Effective Date:

Closing Date:

If Option:

Option Exercise Date:

Option Payment:

Funding Source:

Metro Partner:

Date IGA Executed:

Date City/County Resolution Signed:

Date Metro Resolution Signed:

**or** Exhibit B Letter sent:

Right of First Refusal Letter

date sent:

recipient:

Title Co./Escrow Holder & Address:

Phone no:

Fax no:  
Email address:

Appraiser:

Surveyor:

Environmental Review:  
Internal:

District Councilor:

**I. DUE DILIGENCE REVIEW AND/ OR PREPARING TO EXERCISE THE OPTION**

**A. Title Review**

Title Company:  
Effective date of Preliminary Title Report:  
Reviewed:  
Notice of objections to Seller (permitted exceptions letter) due: \_\_\_\_\_,  
sent: \_\_\_\_\_  
Title Policy to be subject only to:

**B. Appraisal/Appraisal Review**

Appraiser:  
Effective Date of Appraisal:  
Appraisal ordered by:  
Reviewed by: Date reviewed:  
Value confirmed?  
Revision/correction required?  
Appraisal approved as revised?

**C. Environmental/Hazardous Materials Review**

Phase I Environmental inspection by:  
Received:  
Stabilization Mgr review and signoff:  
Underground storage tank?  
Additional action/recommendations:

**D. Survey Review**

1. ALTA Survey  
Certified to Metro and title company  
Confirm acreage  
Any title problems noted?

- 2. Filed Surveys
  - Available?
  - Date surveyed:
  - Surveyor:
  - Date reviewed:
  - Confirm acreage:
  - Any title problems noted?
  
- 3. Site visit boundary review
  - Date conducted:
  - Conducted by:
  - Any boundary, trespass, or other issues noted?
  
- E. **Planning Department/Land Use Actions**
  - a. Planning Jurisdiction:
  - b. Planning information reviewed by: \_\_\_\_\_
  - c. Zoning Designation:
  - d. Does planning file exist on this property? \_\_\_\_\_ Contents?
  
- F. **Council Action**
  - a. Council Target Area Resolution: Res No. \_\_\_\_\_, adopted:  
\_\_\_\_\_
  
  - b. Additional Council Resolution, if any: Res No. \_\_\_\_\_, adopted:  
\_\_\_\_\_
  
- G. **Access, Easements, Permits and Licenses**
  - a. Property description:
  - b. Access (if on State Highway confirm with ODOT):
    - Easements and licenses:
    - Legal confirmed by:
    - Actual confirmed by:
  - c. Mineral rights reserved?
  - d. Leases/Permits
    - Farm lease:
    - Residential lease:
  - e. Reforestation:
  - f.. Other:
  
- H. **Financial Issues**
  - a. Deferred taxes?
  - b. Broker?
  - c. 1031; bargain sale?
  - d. Other:
  
- I. **Additional Agreements/Terms in Option or Purchase and Sale Agreement**
  - a. Possession at closing
  - b. Subdivision/ Covenants, Conditions & Restrictions (CC&Rs):
  - c. Holdback

- d. Leaseback
- e. Easements
- f. Other

**J. Buildings and other Improvements**

- a. Description:
- b. Other improvements:
- c. Possession at closing:
- d. Specific property, debris, unsightly material to be removed:
- e. If residential:
  - Availability of utilities, water, sewage, etc.:
  - Inspection conducted by:
  - Date completed:
  - Additional action/recommendations:

**K. Personal Property or Fixtures?**

- a. Farm/ ranch equipment, age and condition:
- b. Inventory prepared by:
- c. Review title:
- d. Perform UCC-3 lien search if important personal property:

**L. Known off-record Title Problems**

- a. Boundary/fences?
- b. Tenants?
- c. Evidence of potential adverse possession / prescriptive easement/trespassers?

**M. Water**

- a. Water rights:
- b. Review all water certificates, permits, applications:
- c. Confirm title with state water engineer's office/water master:
- d. Confirm irrigation district rights/annual assessment
- e. Confirm not subject to mortgages or other liens:
- f. Confirm eligibility/percentage active rights:
- g. Confirm requirements for transfer or assignment:
- h. Upon closing, file any appropriate documents:
- i. Cost of water use:
- j. Well log(s): copy in file - yes \_\_\_\_ not available \_\_\_\_

**II. EXERCISING THE OPTION**

**A. Option Exercise Letter**

Date sent to Seller: \_\_\_\_\_

Closing Date: \_\_\_\_\_

Subject to conditions?

(Caution: may be deemed a counter offer giving Seller right to terminate)

**III. CLOSING**

- A. Closing documents and other items to be prepared or obtained
  - 1. Closing memo to Chief Operating Officer initialed by paralegal, attorney and parks
  - 2. Deed (statutory warranty deed)
  - 3. Escrow Instructions
  - 4. Buyer’s settlement statement prepared by title company
    - a. real property tax prorations
    - b. closing costs
  - 5. FIRPTA Affidavit
  - 6. 1031 Assignment document, if applicable
  - 7. Water rights assignment, if app.
  - 8. Assignment of Leases and right to receive revenue, if app.
  - 9. Assignment of intangible property (permits, trade names, etc), if app.
  - 10. Bill of sale (if personal property included)
  - 11. Other documents:
- B. Confirm all closing conditions met
  - 1. Review Agreement:
    - a. Any special conditions?
- C. Send closing documents to title company
- D. Arrange for transfer of funds.

**IV. POST-CLOSING MATTERS**

- A. Obtain any keys to the property (info re utilities to parks property manager).
- B. Notify Parks Management of Closing.
- C. Notify Property Manager re: Insurance for improvements.
- D. Insurance for personal property.
- E. Review title policy to make sure it conforms to escrow instructions.

F.	Documents:	Received:	Reviewed:
	Closing Statement:	_____	_____
	Deed:	_____	_____
	Title policy:	_____	_____

G. Send originals of all permanent record documents to Metro Accounting Manager.

Date sent: \_\_\_\_\_



## STAFF REPORT

IN CONSIDERATION OF RESOLUTION NO. 07-3766A AUTHORIZING THE CHIEF OPERATING OFFICER TO PURCHASE PROPERTY WITH ACCEPTED ACQUISITION GUIDELINES AS OUTLINED IN THE NATURAL AREAS IMPLEMENTATION WORK PLAN

---

---

Date: March 1, 2007

Prepared by: Jim Desmond  
Hillary Wilton

## BACKGROUND

On Nov. 7, 2006, voters in the metro region approved a \$227.4 million bond measure directing Metro to purchase natural areas, parks and streams. The 2006 Natural Areas Bond Measure is modeled after the \$135.6 million bond measure approved by the region's voters in 1995 ("Open Spaces, Parks and Streams Bond Measure").

The Open Spaces Implementation Work plan was developed to support the Open Spaces, Parks and Streams Bond Measure and has been updated to support the 2006 Natural Areas Bond Measure as the "Natural Areas Implementation Work Plan".

## OPEN SPACE IMPLEMENTATION WORK PLAN BACKGROUND

The original Open Space Implementation Work Plan, was developed by the collaborative efforts of staff, a committee of real estate experts representing public, private and non-profit organizations, legal counsel, executive staff and Councilors in 1995. The Open Spaces Work Plan was based on the following:

- The amount of land potentially available in each regional target area and trail project exceeds the dollars available for purchase.
- It is imperative that implementation efforts complement the 2040 Concept Plan.
- There is a need to prioritize acquisition efforts in each target area to achieve pre-determined objectives (hereafter referred to as "*Refinement*").
- Local governments, citizens and other stakeholders should be afforded the opportunity to help determine objectives (and thereby land acquisition priorities) for each target area.
- Metro acquisitions should protect regional scale open space and natural areas consistent with the Metropolitan Greenspaces Master Plan.
- The properties within many of the target areas and trail corridors are subject to intense development pressure and cost inflation. Consequently, there is a need to begin *Refinement* and acquisition in all the areas as soon as possible.
- It is essential that acquisition be done in an efficient and timely manner. To facilitate this process, the Metro Council should adopt *Acquisition Parameters*, which authorize the Chief Operating Officer to close land transactions without Council approval when specific conditions are met.

- Metro employees possess many unique skills and abilities. The program should make every effort to utilize the specialized skills of certain staff from other departments when feasible.
- Unique land acquisition opportunities may present themselves prior to the adoption of the target area *Refinement* plans. The policies set forth herein shall govern such early land acquisition opportunities to ensure that if properties considered critical to a target area come on the market, Metro has the ability to evaluate the situation and move in a timely manner, if appropriate.
- The measure sets aside funds for local government greenspace projects. Many of these projects are ready to implement immediately. In order to allow this to occur as soon as possible, Intergovernmental Agreements (also referred to as IGAs) between Metro and the local governments should be processed as soon as possible. Local governments will be reimbursed for project expenditures as they occur.
- Metro should provide the appropriate staff to negotiate and process land acquisitions in all the target areas in a cost effective and business-like manner. Metro should seek to utilize the assistance of non-profit organizations to complement staff acquisition efforts.

**These findings remain current for the 2006 Natural Areas Bond Measure, and are further complemented by Metro's experience.**

#### NATURAL AREAS IMPLEMENTATION WORK PLAN BACKGROUND

The following describe the salient modifications to the Open Spaces Work Plan to create the Natural Areas Implementation Work Plan (as presented to Council in work session November 11, 2006):

##### *Acquisition Parameters*

- No early *acquisition parameters* have been identified in the updated plan, each acquisition opportunity which arises before adoption of target area specific refinement plans, if any, shall be taken to Metro Council for individual consideration.
- Extraordinary assumptions made in appraisals shall be considered an unusual circumstance and brought forth to Council as provided in the Work Plan.
- Appraisal requirements are adjusted for property valued at \$250,000 or less (previously \$100,000).
- Authority for property 10% or up to \$100,000 over appraised value (previously \$50,000) provided other stated conditions are satisfied.

##### *Due Diligence Guidelines*

- A specific requirement for boundary management in *due diligence* will reduce unresolved encroachments, easements and boundaries.
- A more detailed requirement regarding environmental review will ensure that Metro does not obtain any properties that could create environmental liabilities to Metro and grants the Chief Operating Officer discretion to authorize funds to be expended to clean up identified environmental contamination after considering the cost of such remediation and the likelihood that it will be successful.

Staff proposes Metro Council adoption of the *Acquisition Parameters* and *Due Diligence Guidelines*, part of the Natural Areas Implementation Work Plan, and shall return to Council, for adoption of other elements of the plan as authority is required.

## **ANALYSIS/INFORMATION**

### **1. Known Opposition**

None known.

### **2. Legal Antecedents**

Resolution No. 95-2228A, adopted on November 2, 1995, "For the Purpose of Authorizing the Executive Officer to Purchase Property with Accepted Acquisition Guidelines as Outlined in the Open Spaces Implementation Work Plan"

Resolution No. 96-2424, adopted January 9, 1997, "For the Purpose of Authorizing the Executive Officer to Purchase Property with Accepted Acquisition Guidelines as Outlined in the Amended Open Spaces Implementation Work Plan"

Resolution No. 01-3106, adopted September 27, 2001, "For the Purpose of Modifying the Open Spaces Implementation Work Plan and Open Spaces Acquisition Regional Target Area Refinement Plans to Direct Future Acquisitions of Properties that Satisfy Specific Identified Criteria

Resolution No. 05-3612, "For the Purpose of Stating an Intent to Submit to the Voters the Question of the Establishment of a Funding Measure to Support Natural Area and Water Quality Protection and Establishing a Blue Ribbon Committee; and Setting Forth the Official Intent of the Metro Council to Reimburse Certain Expenditures Out of the Proceeds of Obligations to be Issued in Connection with the Regional Parks and Greenspaces Program", adopted on September 29, 2005.

Resolution No. 06-3672B, adopted March 9, 2006, "For the Purpose of Submitting to the Voters of the Metro Area a General Obligation Bond Indebtedness in the Amount of \$227.4 Million to Fund Natural Area Acquisition and Water Quality Protection."

### **3. Anticipated Effects**

Authority has been previously provided to the Chief Operating Officer to purchase real property with accepted guidelines of the Open Spaces Implementation Work Plan. Guidelines of the Natural Areas Implementation Work Plan are very similar, such that the anticipated effects of this action shall mostly involve minor adjustments in staff action but shall not represent a substantial change in procedure.

Staff shall continue to present individual opportunities to Metro Council before refinement plans are adopted for each target area.

### **4. Budget Impacts**

All acquisition will be completed using Natural Areas Bond Measure funds.

## **RECOMMENDED ACTION**

Staff recommends the adoption of Resolution No. 07-3766A.

BEFORE THE METRO COUNCIL

AUTHORIZING THE CHIEF OPERATING ) RESOLUTION NO. 07-3766  
OFFICER TO PURCHASE PROPERTY WITH )  
ACCEPTED ACQUISITON GUIDELINES ) Introduced by Chief Operating Officer  
AS OUTLINED IN THE NATURAL AREAS ) Michael J. Jordan, with the  
IMPLEMENTATION WORK PLAN ) concurrence of Council President  
 ) David Bragdon

WHEREAS, in May 1995 regional voters approved a \$135.6 million Open Spaces, Parks and Streams bond measure (“1995 Open Spaces Bond Measure”); and

WHEREAS, In November 2006 regional voters approved a \$227.4 million Natural Areas Bond Measure (“2006 Natural Areas Bond Measure”); and

WHEREAS, in Resolution No. 95-2228A the Metro Council approved the Open Spaces Implementation Work Plan, “For the Purpose of Authorizing the Executive Officer to Purchase Property with Accepted Acquisition Guidelines as Outlined in the Open Spaces Implementation Work Plan.” This work plan, including amendments by Resolution No. 96-2424, “For the Purpose of Authorizing the Executive Officer to Purchase Property with Accepted Acquisition Guidelines as Outlined in the Amended Open Spaces Implementation Work Plan,” and Resolution 01-3106, “For the Purpose of Modifying the Open Spaces Implementation Work Plan and Open Spaces Acquisition Regional Target Area Refinement Plans to Direct Future Acquisitions of Properties that Satisfy Specific Identified Criteria,” provided the framework within which implementation activities for the 1995 Open Spaces Bond Measure and preliminary work for the 2006 Natural Areas Bond Measure have proceeded; and

WHEREAS, updates and revisions have been made to the Open Spaces Implementation Work Plan to reflect the experience of Metro and respond to changed market conditions and goals of the 2006 Natural Areas Bond Measure; and

WHEREAS, acquisition of natural areas from willing sellers continues to be a primary strategy for preservation of natural areas; and

WHEREAS, property to be acquired by these procedures shall be within target areas identified in the 2006 Natural Areas Bond Measure and further refined by target area-specific refinement plans and tax lot specific maps adopted by Metro Council; and

WHEREAS, a pre-approved set of criteria or conditions under which the Chief Operating Officer and his/her designees are authorized to negotiate and complete land acquisition transactions, related to the implementation of the 2006 Natural Areas Bond Measure are necessary; now therefore

/////

/////

BE IT RESOLVED THAT the Metro Council hereby authorizes the Chief Operating Officer to acquire real property and property interests subject to the requirements of the *Acquisition Parameters* and *Due Diligence Guidelines* of the Natural Areas Implementation Work Plan. A copy of the *Acquisition Parameters* and *Due Diligence Guidelines* are attached as "Exhibit A" and hereby incorporated by reference.

ADOPTED by the Metro Council this \_\_\_\_\_ day of \_\_\_\_\_ 2007.

---

David Bragdon, Council President

Approved as to Form:

---

Daniel B. Cooper, Metro Attorney

Exhibit A to Resolution No. 07-3766

NATURAL AREAS  
IMPLEMENTATION  
WORK PLAN

*Sections on Acquisition Parameters  
and Due Diligence Guidelines Only*



**METRO**

**REGIONAL PARKS AND GREENSPACES  
DEPARTMENT**

600 NE Grand Ave., Portland, OR 97232-2736 (503) 797-1850

## ACQUISITION PARAMETERS

### **Definition:**

"*Acquisition Parameters*" are the Council-approved criteria and conditions under which the Chief Operating Officer and his/her designees are authorized to negotiate and complete land acquisition transactions without further Council review and approval. The Chief Operating Officer and his/her designees may complete a land acquisition transaction that does not meet all of the *acquisition parameters* only with specific Council review and approval.

### **Rationale:**

The creation of pre-approved *acquisition parameters* will permit the agency to deal with willing sellers in a timely and business-like manner and allow the Council to focus on policy level issues.

### **Intent:**

Metro intends to pay no more than fair market value for property, it being acknowledged, however, that the Metro area real estate market is dynamic and the process of identifying fair market value is not exact. Metro's acquisition process should provide as much flexibility as possible to achieve the goals of the Natural Areas Bond Measure and to reflect the actual market conditions affecting the fair market value of properties targeted for natural areas acquisition.

### **Acquisition Parameters:**

The Metro Council authorizes the Chief Operating Officer and his/her designees to negotiate and close real estate transactions related to the 2006 Natural Areas Bond Measure provided all of the following criteria/conditions are met:

- The landowner is a willing seller.
- The property is identified on a Council-adopted target area "confidential refinement map."
- The Real Estate Negotiator and a stabilization team representative have inspected the property, they and the Natural Areas Manager have approved the purchase, and an acknowledgement of such visits and approvals has been completed (Appendix 1).
- If the property is identified as Agricultural Resource Land in the Refinement Plan adopted for the applicable target area, then Metro has complied with the Agricultural Resource Land Guidelines in this Work Plan, as specifically refined by the applicable Refinement Plan for the target area in which the property is located.
- The negotiated purchase price for the property is either:

## STAFF REPORT

### IN CONSIDERATION OF RESOLUTION NO. 07-3766 AUTHORIZING THE CHIEF OPERATING OFFICER TO PURCHASE PROPERTY WITH ACCEPTED ACQUISITION GUIDELINES AS OUTLINED IN THE NATURAL AREAS IMPLEMENTATION WORK PLAN

---

---

Date: March 1, 2007

Prepared by: Jim Desmond  
Hillary Wilton

## BACKGROUND

On Nov. 7, 2006, voters in the metro region approved a \$227.4 million bond measure directing Metro to purchase natural areas, parks and streams. The 2006 Natural Areas Bond Measure is modeled after the \$135.6 million bond measure approved by the region's voters in 1995 ("Open Spaces, Parks and Streams Bond Measure").

The Open Spaces Implementation Work plan was developed to support the Open Spaces, Parks and Streams Bond Measure and has been updated to support the 2006 Natural Areas Bond Measure as the "Natural Areas Implementation Work Plan".

## OPEN SPACE IMPLEMENTATION WORK PLAN BACKGROUND

The original Open Space Implementation Work Plan, was developed by the collaborative efforts of staff, a committee of real estate experts representing public, private and non-profit organizations, legal counsel, executive staff and Councilors in 1995. The Open Spaces Work Plan was based on the following:

- The amount of land potentially available in each regional target area and trail project exceeds the dollars available for purchase.
- It is imperative that implementation efforts complement the 2040 Concept Plan.
- There is a need to prioritize acquisition efforts in each target area to achieve pre-determined objectives (hereafter referred to as "*Refinement*").
- Local governments, citizens and other stakeholders should be afforded the opportunity to help determine objectives (and thereby land acquisition priorities) for each target area.
- Metro acquisitions should protect regional scale open space and natural areas consistent with the Metropolitan Greenspaces Master Plan.
- The properties within many of the target areas and trail corridors are subject to intense development pressure and cost inflation. Consequently, there is a need to begin *Refinement* and acquisition in all the areas as soon as possible.
- It is essential that acquisition be done in an efficient and timely manner. To facilitate this process, the Metro Council should adopt *Acquisition Parameters*, which authorize the Chief Operating Officer to close land transactions without Council approval when specific conditions are met.
- Metro employees possess many unique skills and abilities. The program should make every effort to utilize the specialized skills of certain staff from other departments when feasible.



- Unique land acquisition opportunities may present themselves prior to the adoption of the target area *Refinement* plans. The policies set forth herein shall govern such early land acquisition opportunities to ensure that if properties considered critical to a target area come on the market, Metro has the ability to evaluate the situation and move in a timely manner, if appropriate.
- The measure sets aside funds for local government greenspace projects. Many of these projects are ready to implement immediately. In order to allow this to occur as soon as possible, Intergovernmental Agreements (also referred to as IGAs) between Metro and the local governments should be processed as soon as possible. Local governments will be reimbursed for project expenditures as they occur.
- Metro should provide the appropriate staff to negotiate and process land acquisitions in all the target areas in a cost effective and business-like manner. Metro should seek to utilize the assistance of non-profit organizations to complement staff acquisition efforts.

**These findings remain current for the 2006 Natural Areas Bond Measure, and are further complemented by Metro's experience.**

## NATURAL AREAS IMPLEMENTATION WORK PLAN BACKGROUND

The following describe the salient modifications to the Open Spaces Work Plan to create the Natural Areas Implementation Work Plan (as presented to Council in work session November 11, 2006):

### *Acquisition Parameters*

- No early *acquisition parameters* have been identified in the updated plan, each acquisition opportunity which arises before adoption of target area specific refinement plans, if any, shall be taken to Metro Council for individual consideration.
- Extraordinary assumptions made in appraisals shall be considered an unusual circumstance and brought forth to Council as provided in the Work Plan.
- Appraisal requirements are adjusted for property valued at \$250,000 or less (previously \$100,000).
- Authority for property 10% or up to \$100,000 over appraised value (previously \$50,000) provided other stated conditions are satisfied.

### *Due Diligence Guidelines*

- A specific requirement for boundary management in *due diligence* will reduce unresolved encroachments, easements and boundaries.
- A more detailed requirement regarding environmental review will ensure that Metro does not obtain any properties that could create environmental liabilities to Metro and grants the Chief Operating Officer discretion to authorize funds to be expended to clean up identified environmental contamination after considering the cost of such remediation and the likelihood that it will be successful.

Staff proposes Metro Council adoption of the *Acquisition Parameters* and *Due Diligence Guidelines*, part of the Natural Areas Implementation Work Plan, and shall return to Council, for adoption of other elements of the plan as authority is required.

## ANALYSIS/INFORMATION

### 1. Known Opposition

None known.

## **2. Legal Antecedents**

Resolution No. 95-2228A, adopted on November 2, 1995, “For the Purpose of Authorizing the Executive Officer to Purchase Property with Accepted Acquisition Guidelines as Outlined in the Open Spaces Implementation Work Plan”

Resolution No. 96-2424, adopted January 9, 1997, “For the Purpose of Authorizing the Executive Officer to Purchase Property with Accepted Acquisition Guidelines as Outlined in the Amended Open Spaces Implementation Work Plan”

Resolution No. 01-3106, adopted September 27, 2001, ”For the Purpose of Modifying the Open Spaces Implementation Work Plan and Open Spaces Acquisition Regional Target Area Refinement Plans to Direct Future Acquisitions of Properties that Satisfy Specific Identified Criteria

Resolution No. 05-3612, “For the Purpose of Stating an Intent to Submit to the Voters the Question of the Establishment of a Funding Measure to Support Natural Area and Water Quality Protection and Establishing a Blue Ribbon Committee; and Setting Forth the Official Intent of the Metro Council to Reimburse Certain Expenditures Out of the Proceeds of Obligations to be Issued in Connection with the Regional Parks and Greenspaces Program”, adopted on September 29, 2005.

Resolution No. 06-3672B, adopted March 9, 2006, “For the Purpose of Submitting to the Voters of the Metro Area a General Obligation Bond Indebtedness in the Amount of \$227.4 Million to Fund Natural Area Acquisition and Water Quality Protection.”

## **3. Anticipated Effects**

Authority has been previously provided to the Chief Operating Officer to purchase real property with accepted guidelines of the Open Spaces Implementation Work Plan. Guidelines of the Natural Areas Implementation Work Plan are very similar, such that the anticipated effects of this action shall mostly involve minor adjustments in staff action but shall not represent a substantial change in procedure.

Staff shall continue to present individual opportunities to Metro Council before refinement plans are adopted for each target area.

## **4. Budget Impacts**

All acquisition will be completed using Natural Areas Bond Measure funds.

## **RECOMMENDED ACTION**

Staff recommends the adoption of Resolution No. 07-3766.

1. Equal to or less than the fair market value as established by the appraisal and appraisal review processes described below (note that Metro will actively solicit donations and bargain sales); or
2. Not more than 10% or \$100,000, whichever is less, above such fair market value and the Chief Operating Officer has authorized acquisition of the property at such price after taking into account the following “public interest” factors:
  - The importance of the site based on the applicable adopted Refinement Plan for that target area;
  - The impact to the overall goals and progress of the program and the applicable Refinement Plan for that target area that will result if the property is not purchased; and
  - Whether any other parties are making financial contributions toward the purchase price.

- **Appraisal**

An independent certified appraiser has completed an appraisal of the property that states a conclusion of the fair market value of the property or, if appropriate, a range of value. The appraisal may be in summary report format. The appraiser shall state in the appraisal any assumptions that he/she relied upon to determine the property’s fair market value; however, the appraisal shall not be based upon any “extraordinary assumptions” made by the appraiser that materially affect the property’s fair market value.

- **Appraisal Review**

A certified appraiser has completed a review of the appraisal if either (1) the property’s purchase price is \$250,000 or more, or (2) the Metro Attorney determines, at his/her sole discretion, that such an appraisal review is appropriate under the circumstances of a particular proposed acquisition. Such appraisal review shall be completed in accordance with the Uniform Standards of Professional Appraisal Practice (“USPAP”) and general appraisal standards and may include a determination of an acceptable range of value for the property by the review appraiser. If the review appraiser determines that the appraisal does not meet USPAP or other general appraisal standards, the review appraiser, after consultation with and at the direction of the Office of the Metro Attorney, may either (a) work with the appraiser to correct the deficiencies, (b) order a second appraisal to be reviewed in the manner set forth herein, or (c) make a final determination of the range of value for the property.

- *"Due diligence"* has been completed in conformance with the *due diligence* section of this Work Plan and no unusual circumstances have been found to exist.

## **Notices and Reports to Council Regarding Completed Transactions**

The Natural Areas Bond Program Manager or his/her designees shall notify the Council promptly following the closing of any real estate transaction. The Chief Operating Officer or his/her designees shall prepare and present to the Council quarterly updates summarizing acquisition activity distinguished by target area.

## DUE DILIGENCE GUIDELINES

### **Definition:**

"*Due diligence*" is the systematic inspection of the legal title and physical condition of real property before that property is purchased to assure protection of public investment in natural area and trail properties. *Due diligence* should be conducted in advance of closing so that resolvable problems can be adequately addressed prior to closing.

### **Components:**

The primary areas of *due diligence* are described below. A more detailed list of items examined may be found in the Appendix under "Due Diligence and Closing Checklist." The Metro Attorney may amend the checklist as determined necessary and appropriate at his/her discretion.

The Due Diligence Team is comprised of the Real Estate Negotiator, Metro Attorney staff, and Stabilization Manager for each property.

- **Appraisal:** An appraisal of the property must be completed to determine the property's fair market value and provide other useful information about the property. The appraisal shall be in the format described in the previous section regarding *acquisition parameters* and shall be reviewed in the manner set forth therein.
  
- **Examination of Title:**
  1. Metro must satisfy itself that the property is the seller's to sell, that Metro understands what rights will be conveyed, that all parties necessary for the conveyance are involved, and that any rights that are not a part of the transaction will not defeat the purpose of the acquisition.
  
  2. *Due diligence* requires the review and inspection of the title report and related documents, including the deed to the current owner, recorded easements and other encumbrances, water rights, access rights, taxes, liens, etc.
  
  3. Other documents that need to be inspected include unrecorded leases with existing tenants or farmers, management agreements, records pertaining to personal property included in the sale, surveys, and agreements the seller may have entered into that may not be of record.
  
- **Inspection of the Property:**
  1. Location of Boundaries. *Due diligence* requires the review of any existing survey of the property. Absent a recent survey, Metro should identify the known or assumed property boundaries on site. If such boundary identification is not apparent, a new survey will be conducted unless deemed unnecessary or uneconomical by the Due Diligence Team.

Additionally, Metro must identify that both legal and physical access to the property exist and are usable. Legal and physical access by the public will be secured unless the nature of the property is such that access restrictions are acceptable for that property.

2. **Physical Inspection.** Metro or its contractors and agents must physically inspect the property for environmental assessment purposes and to identify possible hazards, unrecorded easements and trespassers, and to make a preliminary evaluation of the condition of any structures and improvements (roads, fences, utilities, etc.), which shall be further evaluated during the stabilization period (see section regarding *Stabilization and Land Stewardship, supra*). Any encroachments, potential property boundary disputes, or unrecorded use of the property identified either during property inspection or in title search will be resolved prior to closure unless deemed impractical by the Due Diligence Team and the Natural Areas Manager has authorized closing notwithstanding such circumstances(s).

3. **Environmental Review.** Metro shall contract with an environmental professional to conduct a Phase I Environmental Assessment in accord with the requirements of the federal All Appropriate Inquiries standards set forth in 40 CFR Part 312, ASTM Standard E1527-05, as that standard may be revised and updated, and in accord with applicable state of Oregon law and regulation, for the purpose of establishing the Innocent Landowner Defense pursuant to CERCLA section 101(35) and 107(b)(3). If the Phase I Environmental Assessment identifies environmental conditions indicative of releases or threatened releases of hazardous substances, pollutants, contaminants, petroleum and petroleum products and controlled substances, Metro shall contract with an Environmental Professional to conduct a Phase II Environmental Investigation, which may include soil and groundwater sampling and testing, in accord with ASTM Standards. The Chief Operating Officer may authorize the expenditure of Natural Area Program bond funds to remediate environmental contamination identified on a property by a Phase II Environmental Assessment provided that the Chief Operating Officer has concluded that (a) such expenditure is reasonable in relation to the purchase price and appraised value of such property, and (b) such expenditure will result in receipt of a "No Further Action" letter, or a substantial equivalent, from the Oregon Department of Environmental Quality or will substantially eliminate the probability of future environmental liability to Metro, based on information provided in the Phase II Environmental Assessment. If such expenditure successfully remediates an environmental condition identified in a Phase II Environmental Assessment then such condition shall no longer be considered an "unusual circumstance," as described in the following paragraph of this work plan.

- **Unusual Circumstances.** If, in the course of *due diligence*, the Due Diligence Team discovers any unusual deed or title restrictions, encumbrances, or environmental conditions that may prohibit or unduly restrict Metro's ability to use the property as a natural area or for a trail or that may create a liability to Metro, such restrictions, encumbrances, or conditions shall be considered "unusual circumstances." As provided in the section of this Work Plan regarding *acquisition parameters*, the Chief Operating Officer and his/her designees may not complete the purchase of a property with such unusual circumstances without obtaining the Metro Council's specific approval prior to such acquisition.
- **Document Retention.** Documents related to acquisitions shall be retained as determined appropriate by the Metro Attorney.

**DUE DILIGENCE AND CLOSING CHECKLIST**

Target Area: File No. \_\_\_\_\_

Seller:

Seller's Attorney/Representative:

Property address and/or tax lot designation:

County:

Refinement designation:

Real Estate Negotiator:

Acres:

Purchase Price:

Escrow Deposit: \$\_\_\_\_\_ ; Delivered to Escrow Co. on \_\_\_\_\_

Option or Purchase and Sale Agreement?

Effective Date:

Closing Date:

If Option:

Option Exercise Date:

Option Payment:

Funding Source:

Metro Partner:

Date IGA Executed:

Date City/County Resolution Signed:

Date Metro Resolution Signed:

**or** Exhibit B Letter sent:

Right of First Refusal Letter

date sent:

recipient:

Title Co./Escrow Holder & Address:

Phone no:

Fax no:

Email address:

Appraiser:

Surveyor:

Environmental Review:

Internal:

District Councilor:

## **I. DUE DILIGENCE REVIEW AND/ OR PREPARING TO EXERCISE THE OPTION**

### **A. Title Review**

Title Company:

Effective date of Preliminary Title Report:

Reviewed:

Notice of objections to Seller (permitted exceptions letter) due: \_\_\_\_\_ sent: \_\_\_\_\_

Title Policy to be subject only to:

### **B. Appraisal/Appraisal Review**

Appraiser:

Effective Date of Appraisal:

Appraisal ordered by:

Reviewed by:

Date reviewed:

Value confirmed?

Revision/correction required?

Appraisal approved as revised?

### **C. Environmental/Hazardous Materials Review**

Phase I Environmental inspection by:

Received:

Stabilization Mgr review and signoff:

Underground storage tank?

Additional action/recommendations:

### **D. Survey Review**

#### **1. ALTA Survey**

Certified to Metro and title company

Confirm acreage

Any title problems noted?

#### **2. Filed Surveys**

Available?

Date surveyed:

Surveyor:

Date reviewed:

Confirm acreage:

Any title problems noted?



- 3. Site visit boundary review
  - Date conducted:
  - Conducted by:
  - Any boundary, trespass, or other issues noted?

**E. Planning Department/Land Use Actions**

- a. Planning Jurisdiction:
- b. Planning information reviewed by: \_\_\_\_\_
- c. Zoning Designation:
- d. Does planning file exist on this property? \_\_\_\_\_ Contents?

**F. Council Action**

- a. Council Target Area Resolution: Res No. \_\_\_\_\_, adopted: \_\_\_\_\_
- b. Additional Council Resolution, if any: Res No. \_\_\_\_\_, adopted: \_\_\_\_\_

**G. Access, Easements, Permits and Licenses**

- a. Property description:
- b. Access (if on State Highway confirm with ODOT):
  - Easements and licenses:
  - Legal confirmed by:
  - Actual confirmed by:
- c. Mineral rights reserved?
- d. Leases/Permits
  - Farm lease:
  - Residential lease:
- e. Reforestation:
- f. Other:

**H. Financial Issues**

- a. Deferred taxes?
- b. Broker?
- c. 1031; bargain sale?
- d. Other:

**I. Additional Agreements/Terms in Option or Purchase and Sale Agreement**

- a. Possession at closing
- b. Subdivision/ Covenants, Conditions & Restrictions (CC&Rs):
- c. Holdback
- d. Leaseback
- e. Easements
- f. Other

**J. Buildings and other Improvements**

- a. Description:
- b. Other improvements:
- c. Possession at closing:
- d. Specific property, debris, unsightly material to be removed:
- e. If residential:
  - Availability of utilities, water, sewage, etc.:
  - Inspection conducted by:
  - Date completed:

Additional action/recommendations:

**K. Personal Property or Fixtures?**

- a. Farm/ ranch equipment, age and condition:
- b. Inventory prepared by:
- c. Review title:
- d. Perform UCC-3 lien search if important personal property:

**L. Known off-record Title Problems**

- a. Boundary/fences?
- b. Tenants?
- c. Evidence of potential adverse possession / prescriptive easement/trespassers?

**M. Water**

- a. Water rights:
- b. Review all water certificates, permits, applications:
- c. Confirm title with state water engineer's office/water master:
- d. Confirm irrigation district rights/annual assessment
- e. Confirm not subject to mortgages or other liens:
- f. Confirm eligibility/percentage active rights:
- g. Confirm requirements for transfer or assignment:
- h. Upon closing, file any appropriate documents:
- i. Cost of water use:
- j. Well log(s): copy in file - yes \_\_\_\_ not available \_\_\_\_

**II. EXERCISING THE OPTION**

**A. Option Exercise Letter**

Date sent to Seller: \_\_\_\_\_

Closing Date: \_\_\_\_\_

Subject to conditions?

(Caution: may be deemed a counter offer giving Seller right to terminate)

**III. CLOSING**

**A. Closing documents and other items to be prepared or obtained**

- 1. Closing memo to Chief Operating Officer initialed by paralegal, attorney and parks
- 2. Deed (statutory warranty deed)
- 3. Escrow Instructions
- 4. Buyer's settlement statement prepared by title company
  - a. real property tax prorations
  - b. closing costs
- 5. FIRPTA Affidavit
- 6. 1031 Assignment document, if applicable
- 7. Water rights assignment, if app.
- 8. Assignment of Leases and right to receive revenue, if app.
- 9. Assignment of intangible property (permits, trade names, etc), if app.

- 10. Bill of sale (if personal property included)
- 11. Other documents:
- B. Confirm all closing conditions met
  - 1. Review Agreement:
    - a. Any special conditions?
- C. Send closing documents to title company
- D. Arrange for transfer of funds.

**IV. POST-CLOSING MATTERS**

- A. Obtain any keys to the property (info re utilities to parks property manager).
- B. Notify Parks Management of Closing.
- C. Notify Property Manager re: Insurance for improvements.
- D. Insurance for personal property.
- E. Review title policy to make sure it conforms to escrow instructions.
- F. Documents:                      Received:                      Reviewed:
- Closing Statement:            \_\_\_\_\_                      \_\_\_\_\_
- Deed:                                \_\_\_\_\_                      \_\_\_\_\_
- Title policy:                      \_\_\_\_\_                      \_\_\_\_\_
- G. Send originals of all permanent record documents to Metro Accounting Manager.

Date sent: \_\_\_\_\_