



AGENDA ITEM COVER SHEET
Morrow County Board of Commissioners
 (Page 1 of 3)

Item # 5c

This document must be completed for each agenda item submitted for consideration by the Board of Commissioners.

Staff Contact: Jerry Sorte, Administrative Officer
 Department: Board of Commissioners
 Person Attending BOC Meeting (Required): Jerry Sorte
 Short Title of Agenda Item: Finance Department Staffing

Phone Number (Ext): 541-676-2529
 Requested Agenda Date: August 23, 2017

This Item Involves: (Check all that apply for this meeting.)	
<input type="checkbox"/> Order or Resolution	<input type="checkbox"/> Appointments
<input type="checkbox"/> Ordinance/Public Hearing:	<input type="checkbox"/> Update on Project/Committee
<input type="checkbox"/> 1st Reading <input type="checkbox"/> 2nd Reading	<input type="checkbox"/> Discussion Only
<input type="checkbox"/> Public Comment Anticipated:	<input checked="" type="checkbox"/> Discussion & Action
Estimated Time:	Estimated Time: 15 minutes
<input type="checkbox"/> Document Recording Required	<input type="checkbox"/> Department Report
<input type="checkbox"/> Contract/Agreement	<input type="checkbox"/> Other:

<input checked="" type="checkbox"/> N/A	For Contracts and Agreements Only	
Contractor/Entity:		
Contractor/Entity Address:		
Effective Dates – From:	Through:	
Total Contract Amount:	Budget Line:	
Does the contract amount exceed \$5,000? <input type="checkbox"/> Yes <input type="checkbox"/> No		
If Yes, Attach Purchase Pre-Authorization Request if Applicable		

Reviewed By:

_____	Department Head	Required for all BOC meetings
DATE		
_____	Admin. Officer/BOC Office	Required for all BOC meetings
DATE		
_____	County Counsel	Required for all legal documents
DATE		
_____	Finance Office	Required for all contracts; Other items as appropriate.
DATE		
_____	Human Resources	If appropriate
DATE		

Note: All entities must sign documents before they are presented to the Board of Commissioners. Original documents are preferred. Agenda requests, including this completed form and supporting documents, must be received by the Board's office by Noon on the Friday prior to the Board of Commissioners Wednesday meeting. County Counsel and Finance review is required for all contracts.

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Morrow County Board of Commissioners
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1. TITLE OF AGENDA ITEM: Finance Department Staffing
2. ISSUES, BACKGROUND, AND DISCUSSION: At the July 19, 2017 meeting, the Board of Commissioners approved a motion to appoint the Finance Director (Kate Knop) to the position of County Auditor with the duties therein, and directed staff to report back with fiscal and staffing impacts. Resolution R-2017-21 making that appointment was approved by the Board of Commissioners on July 26, 2017. Kate Knop took the oath to faithfully perform the duties of office on August 14, 2017. The ORS refers to the position as the County Accountant, and the Morrow County Code refers to the position as the County Auditor.

During the discussion with the Board on July 19, 2017, staff acknowledged that additional staffing would like be needed to accommodate the new duties placed in the Finance Department. The functions of the County Accountant are listed in ORS 210. See Attachment A. The functions require that new processes be established. See Attachment B.

Based on an analysis of the additional functions required by the County Accountant, there is a need for a staff member with formal accounting training to assist with the requirements placed on the Finance Department. This would be best accomplished by recruiting for an additional staff member. The addition of a staff accountant would allow the Finance Director to allocated duties between staff members in the Finance Department in order to effectively accommodate the increase in duties. A draft job description is included as Attachment C.

An additional staff member could also provide some additional time for the Finance Director to develop the financial policies that have been discussed by the Board of Commissioners over the past several months. There may be an opportunity over time to make needed updates to the County's travel and credit card policies, and to provide needed staff training in order to enforce the above policies.

It should also be acknowledged that appointing the Finance Director as the County Accountant increases the responsibility of that position. A staff accountant would help to address the work load; however, the Finance Director/County Accountant is ultimately responsible for the completion of the new job duties. When analyzed through the County's JobMeas program, the addition of the County Accountant function does not increase the pay classification level of the Finance Director. However, in order to acknowledge the increased level of statutorily defined job duties described above, I recommend that the Finance Director pay range be increased by ½ level (2.5%) when the Finance Director serves as the County Accountant. This would increase the monthly pay to the current Finance Director/County Accountant by approximately \$230 per month; inclusive of 2.5% increase in base pay plus FICA, Medicare, SUTA, and retirement benefits.

3. OPTIONS:
- A. Direct staff to begin a recruitment for a staff accountant in order to fulfill the requirements of the County Accountant function; and
 - B. Increase level of pay for Finance Director/County Accountant by 2.5%; or
 - B. Remove County Accountant functions due to lack of staff resources; or
 - C. Other

4. FISCAL IMPACT:
- The annual cost of adding a 1.0 FTE staff accountant would be approximately \$90,000, which amounts to approximately \$75,000 for the remaining ten months of the fiscal year. This includes base pay (approximately \$50,000 per year) and benefits (approximately \$40,000 per year). Initial ancillary costs

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would include the procurement of a computer work station and necessary office equipment. Increasing pay to the Finance Director/County Accountant as described above would cost approximately \$2,300 for the remaining 10 months of the fiscal year.

The County budget is relatively tight this year, since a large percentage of discretionary funds were used to fund the Road Department. The County has allocated \$300,000 to a contingency fund, and the Board of Commissioners has \$15,000 in their discretionary fund.

5. STAFF RECOMMENDATIONS:

I recommend that the Board of Commissioners direct staff to begin recruitment for a staff accountant as outlined above and increase the pay level of the Finance Director when appointed as the County Accountant.

6. SUGGESTED ACTION(S) / MOTION(S):

Move to direct staff to begin recruitment for a staff accountant as outlined above.

Routing: Original or copies of signed contract or document should be sent to the following:

- | | |
|---|---|
| <input type="checkbox"/> Clerk (Original for recording) | <input type="checkbox"/> Finance Department (Copy for file) |
| <input type="checkbox"/> Board of Commissioners (Copy for file) | <input type="checkbox"/> Department – For distribution |
| <input type="checkbox"/> Other _____ | |

Attachment A – ORS 210

Chapter 210 — County Accountants

2015 EDITION

COUNTY ACCOUNTANTS

COUNTIES AND COUNTY OFFICERS

- 210.100 Creation of office of county accountant
- 210.120 Oath of accountant; bond or letter of credit; requirements for sureties and letter of credit issuers
- 210.130 Additional bond or letter of credit
- 210.140 Liability for acts of assistants
- 210.150 Bond or letter of credit of assistants
- 210.160 Auditing and payment of accountant's salary; auditing of other demands
- 210.170 Auditing and allowing claims; financial records and reports
- 210.180 Necessity for audit of all county payments
- 210.190 Limitations on allowance of demands
- 210.200 Claim investigational powers
- 210.210 Duties and powers of accountant
- 210.220 System of accounts and statements; inspection of books
- 210.230 Preparation, distribution and use of official receipts

210.010 [Amended by 1963 c.519 §33; 1979 c.492 §4; repealed by 1981 c.216 §14]

210.100 Creation of office of county accountant. The governing body of any county may by ordinance create an office of county accountant. [1981 c.216 §1; 1983 c.310 §2]

210.110 [Repealed by 1981 c.216 §14]

210.120 Oath of accountant; bond or letter of credit; requirements for sureties and letter of credit issuers. The person appointed to the office of county accountant shall qualify within 30 days from the time of the appointment by taking and filing with the clerk of the county an oath to faithfully perform the duties of office, and by executing an official bond, with sureties to be approved by the board of county commissioners, or an irrevocable letter of credit, in either case in the sum of \$20,000. The bond or letter of credit shall contain a condition that the principal will faithfully perform the official duties then or which may thereafter be imposed upon or be required of the principal by law, and that at the expiration of the term of office the principal will surrender to any successor all property, books, papers and documents that may come into the possession of the principal. Any bond shall be executed by a lawfully authorized surety company, or by two sureties who shall each justify in the amount required by the bond; and any letter of credit shall be issued by an insured institution, as defined in ORS 706.008. When there are more than two sureties, or more than two letter of credit issuers, they shall justify in an amount which the aggregate shall equal double the amount of the bond or letter of credit. Every surety upon such official bond other than lawfully authorized surety companies must make an affidavit, which shall be indorsed upon the bond, that the surety is a resident and freeholder in the county in which the bond is filed, and worth in property situated in the county, exclusive of encumbrances thereon, double the amount of the undertaking over and above all sums for which the surety is already liable or in any manner bound, whether as principal, indorser or surety, and whether such prior obligation or liability is conditional or absolute, liquidated or unliquidated, due or to become due. All persons offered as sureties on official bonds may be examined on oath as to their qualifications by the officers whose duty it is to approve the bond. [Amended by 1981 c.216 §2; 1983 c.310 §3; 1991 c.331 §47; 1997 c.631 §427]

210.130 Additional bond or letter of credit. Whenever, in the opinion of the board of county commissioners, the county accountant's letter of credit, bond or any surety thereon becomes insufficient, the board shall require an additional bond or letter of credit. An additional bond or letter of credit shall also be required when a surety to a bond dies or ceases to be a resident of the county. The county accountant or any of the deputies of the accountant, who are required by law to give bonds or letters of credit, may present as surety any lawfully authorized surety company, to be approved by the county commissioners, and the commissioners may pay the premium thereon. [Amended by 1981 c.216 §3; 1983 c.310 §4; 1991 c.331 §48; 2005 c.22 §160]

210.140 Liability for acts of assistants. A county accountant shall be liable on the official bond required under ORS 210.120 or 210.130 for the acts and omissions of any deputies, assistants, clerks and employees appointed by the county accountant, and the official bond shall contain such a condition. [Amended by 1981 c.216 §4; 1983 c.310 §5]

210.150 Bond or letter of credit of assistants. A county accountant may require the deputies, clerks, assistants and employees of the accountant to give bonds of indemnity, with sufficient sureties, or to give an irrevocable letter of credit issued by an insured institution, as defined in ORS 706.008, for the faithful performance of their duties. [Amended by 1981 c.216 §5; 1983 c.310 §6; 1991 c.331 §49; 1997 c.631 §428]

Attachment A – ORS 210

210.160 Auditing and payment of accountant's salary; auditing of other demands. The demand of a county accountant for monthly salary shall be audited, allowed and ordered paid by the board of county commissioners. All other demands on account of salaries, or otherwise, fixed by law or otherwise and made payable out of the treasury, must be approved by the accountant before being ordered paid. [Amended by 1965 c.251 §5; 1981 c.216 §6; 1983 c.310 §7]

210.170 Auditing and allowing claims; financial records and reports. (1) The county accountant shall be the accounting officer of the county. All demands, accounts or claims against the county shall be presented to the accountant with the necessary evidence in support thereof, and the accountant shall examine and audit the same. If the accountant finds such demands, accounts or claims correct, lawful, just and valid, and authorized by the board of county commissioners, the accountant shall indorse them as audited and approved, with the date thereof. After auditing and approving any such claim, the accountant shall draw an order on the county treasurer for the payment thereof, which order the county treasurer shall, when presented, either pay or indorse "Not paid for want of funds," as provided in ORS 208.020.

(2) If a demand, claim or account and evidence in support thereof is not sufficient to satisfy the accountant as to its correctness, lawfulness, justness or validity, the accountant shall indorse the same as audited and rejected, with the date thereof, and report the same to the board of county commissioners with such explanation as the accountant may deem necessary.

(3) The accountant shall receive and preserve in the office of the accountant all accounts, books, vouchers, documents and papers relating to the accounts and contracts of the county, its debts, revenues and other financial affairs.

(4) The accountant shall give information as to the exact condition of the treasury and of every fund thereof upon demand by the board of county commissioners, or any member thereof.

(5) All claims approved and ordered paid shall be numbered consecutively, and the order drawn for the same shall designate the fund out of which it is payable. [Amended by 1981 c.216 §7; 1983 c.310 §8]

210.180 Necessity for audit of all county payments. Any law or rule providing for the payment of any demand of any kind or nature, except the salary of the county accountant, out of the treasury or any fund thereof, whether from public funds or private funds deposited therein, shall be construed as requiring auditing and approval by the accountant, and an order of the board of county commissioners before payment. No order or warrant for the payment of any demand shall be valid, either in the hands of the original payee or holder, or any transferee or assignee thereof, unless the demand for which the same was issued shall have been first duly audited and approved by the accountant. [Amended by 1981 c.216 §8; 1983 c.310 §9]

210.190 Limitations on allowance of demands. No demand shall be allowed by a county accountant in favor of:

Attachment A – ORS 210

(1) Any corporation or person in any manner indebted to the county, except for taxes not delinquent, without first deducting the amount of any indebtedness of which the accountant has notice.

(2) Any person having the collection, custody or disbursement of the public funds, unless the account of the person has been presented, passed upon, approved and allowed.

(3) Any officer who has neglected to make official returns or reports in the manner and at the time required by law or the requirements of the board of county commissioners.

(4) Any officer who has neglected to comply with any provision of law regulating the duties of the officer.

(5) Any officer or employee for time absent without legal cause from the duties of such officer or employee during office hours. The accountant must always examine on oath any person receiving a salary from the county touching such absence. [Amended by 1981 c.216 §9; 1983 c.310 §10]

210.200 Claim investigational powers. A county accountant may administer oaths. The accountant may require any person presenting for settlement an account or claim for any cause against the county to be sworn before the accountant touching such account or claim, and when so sworn to answer orally as to any facts relative to the justice and items of such account or claim. No demand shall be approved, allowed, audited or paid unless it specifies each item, date and amount composing it. [Amended by 1981 c.216 §10; 1983 c.310 §11]

210.210 Duties and powers of accountant. A county accountant shall:

(1) Keep a register of all claims presented against the county and place upon each a uniform mark or stamp, to indicate that it has been examined by the accountant.

(2) Keep an account with each department of the county government and with each county official.

(3) Check the deposits made with the county treasurer, by the several officers, of the fees received daily by them, and the fines, forfeited bails and all county, school, road, state or other funds received from any source and deposited with the county treasurer.

(4) Establish and maintain, in each department and office of the county, such system of keeping accounts and transacting the county business as shall secure accuracy, economy and protection of the county's interests.

(5) At all times have access to any and all public books, records, and documents kept by the various officers of the county.

Attachment A – ORS 210

(6) See that all fees, dues or funds of any description, or on any account to which the county is entitled, are deposited with the county treasurer; and immediately report to the board of county commissioners any officer in default in this regard.

(7) Examine all reports of sheriffs, as to the collection of taxes, and all other general or special reports of officers or persons where any of the county's finances are involved, and report to the board of county commissioners findings and recommendations in each case.

(8) Prepare and publish, at the close of business on June 30 of each year, a statement showing the contracts entered into by the county for the year covered by the report, the name of the contractor, the work contracted for, the amount of the same, whether the bonds were required and the amount and whether let privately or by public bidding, and also publish a certified statement of the assets and liabilities of the county.

(9) Prepare at least once in each calendar year an exhibit of all receipts and disbursements of the county fund for the year. Such exhibit shall also include a detailed statement of the expenses of the county, segregated as to each office and each department of the county government and business, showing the total amounts for which warrants or orders were issued or drawn during the year, and a statement showing the total amount of money paid into the county treasury for the year, from what source derived, and the amounts apportioned to the various funds. [Amended by 1981 c.216 §11; 1983 c.310 §12; 1991 c.683 §1]

210.220 System of accounts and statements; inspection of books. A county accountant shall establish a standard system of keeping accounts and a uniform method of statements for the same. The books of the accountant shall at all times be subject to the inspection of the board of county commissioners, or any member thereof, and of the grand jury, or to any person or persons appointed by the board or by the grand jury to examine the same. [Amended by 1981 c.216 §12; 1983 c.310 §13]

210.230 Preparation, distribution and use of official receipts. (1) A county accountant shall have prepared suitable forms of receipts, and from time to time shall deliver to the treasurer and to every officer authorized by law to charge any fee, commission, percentage, allowance or compensation for the performance of any official duty, as many official receipts as may be required, charging such officers for them.

(2) When the books or rolls containing receipts are exhausted by the officer receiving them, the officer shall file a record of the receipts issued and keep the same in convenient form for examination.

(3) Whenever any receipt is issued by any officer, it shall contain the date issued, the name of the person making payment, the amount of payment, the nature of the service for which the charge is made and the name and official designation of the officer performing the service. Corresponding entries shall appear on each record of the receipt.

(4) The receipt shall be given to the person making payment, and at the close of each day a record of such receipts shall be filed with the accountant.

Attachment A – ORS 210

(5) Each officer receiving any fee, commission, percentage, allowance or compensation, as described in this section, shall, on or before the fourth day of each month, pay the same to the treasurer and take a receipt therefor.

(6) The treasurer shall, on or before the fifth day of each month, file duplicates of all receipts issued by the treasurer with the accountant.

(7) All such payments by officers to the treasurer shall be accompanied by an itemized statement of the various services for which charges were made and the amount of each charge. Each officer shall file a duplicate of the statement with the accountant.

(8) Every officer receiving blank receipts from the accountant shall, on or before the fifth day of each month, exhibit to the accountant all unused receipts remaining. [Amended by 1981 c.216 §13; 1983 c.310 §14]

210.310 [Repealed by 1959 c.174 §6]

210.320 [Repealed by 1981 c.216 §14]

210.330 [Repealed by 1981 c.216 §14]

210.340 [Repealed by 1981 c.216 §14]

210.350 [Repealed by 1981 c.216 §14]

210.360 [Repealed by 1981 c.216 §14]

210.370 [Repealed by 1981 c.216 §14]

210.380 [Repealed by 1981 c.216 §14]

210.390 [Repealed by 1981 c.216 §14]

210.400 [Repealed by 1981 c.216 §14]

210.410 [Repealed by 1981 c.216 §14]

210.420 [Repealed by 1981 c.216 §14]

210.430 [Repealed by 1981 c.216 §14]

210.440 [Repealed by 1981 c.216 §14]

210.510 [1953 c.570 §1; 1965 c.341 §1; repealed by 1981 c.216 §14]

210.520 [1953 c.570 §2; repealed by 1965 c.341 §2]

Attachment A – ORS 210

210.530 [1953 c.570 §3; repealed by 1981 c.216 §14]

CHAPTERS 211 TO 213

[Reserved for expansion]

Attachment B

Duties of County Accountant/Auditor

Anticipated New Tasks

- ORS 210.170 Auditing and allowing claims; financial records and reports
 - Shall be the accounting officer of the county.
 - Audit and reject claims, with the date thereof, and report the same to the BOC.
 - The accountant shall receive and preserve in the office of the accountant all accounts, books, vouchers, documents, and papers relating to the accounts and contracts of the county, its debts, revenue, and other financial affairs.
 1. Access to all accounts (Bank of Eastern Oregon, Community Bank, Banner Bank, Treasury Pool)
 2. Books: Treasurer, department petty cash books, trust accounts
 3. Contracts: IGA's, PSA's, MOU's, Grants, etc.
 4. Loan Documents: Banner loan, Docken loan, equipment loans, etc.
 - Shall give information as to the exact condition of the treasury and of every fund thereof upon demand by the BOC.
- ORS 210.200 Claim investigational powers.
 1. May administer oaths.
- ORS 210.210 Duties and powers of accountant.
 - (#3) Check the deposits made with the county treasurer, by the several officers, of the fees received by them, and the fines, forfeited bails and all county, school, road, state, or other funds received from any source and deposited with the country treasurer.
(internal audit procedure).
 1. New process.
 - (#4) Establish and maintain, in each department and office of the county, such system of keeping accounts and transacting the county business as shall secure accuracy, economy and protection of the county's interests.
 1. New process.
 - (#5) At all times have access to any and all public books, records, and documents kept by the various officers of the county.
 1. Write letter.
 - (#6) See that all fees, dues or funds of any description, or any account to which the county is entitled, are deposited with the county treasurer
 1. New process/internal control.
 - (#7) Examine all reports as to the collection of taxes, and all other general or special reports of officers or persons where any of the county's finance are involved. Report to the board finding and recommendations in each case.
 1. New process/internal control.

- (#8) Prepare and publish, at the close of business on June 30 of each year, a statement showing the contracts entered into by the county.
 1. New report/internal control.
- (#9) Prepare at least once in each calendar year an exhibit of all receipts and disbursements of the county fund for the year.
 1. New report.
- ORS 210.220 System of accounts and statements: inspection of books.
 - Establish a system of keeping accounts and a uniform method of statements.
 - New process.
- ORS 210.230 Preparation, distribution, and use of official receipts?
 - (#5) Each officer receiving any fee, commission percentage, allowance or compensation shall on or before the fourth day of each month, pay the same to the treasurer.
 - Internal control? Report?
 - (#7) Itemized statement of charges for services by each officer
 - Existing Report?
 - (#8) Every officer receiving blank receipts from the accountant shall on or before the fifth day of each month exhibit to the accountant all unused receipts remaining.
 - New process.
 - New internal control.

JOB DESCRIPTION

Date Prepared: August 22, 2017

Position Title: Staff Accountant

Department: Finance

Supervisor: Finance Director

Position Overview: The Staff Accountant, under the supervision of the Finance Director, is responsible for researching, interpreting, and understanding government accounting and regulations, audit policies, and contract requirements.

Working Environment: The tasks and responsibilities are carried out in the Finance Department office in the Morrow County Bartholomew Building as well as occasionally at other county locations. Position has frequent deadline pressures and is responsible for financial analysis, general ledger reconciliations, and internal controls.

Qualifications:

1. Education – Bachelor's Degree in Accounting or related field.
2. Experience – One to two years in governmental accounting.
3. Equipment used - Computer, copier, 10-key, phones, and car
4. Knowledge and skill to implement accepted public accounting principles and practices.
5. Skill and ability in learning and utilizing a variety of software programs.
6. Ability to learn, apply and develop procedures, systems and processes of the Morrow County Finance Department.
7. Skill in organizing work in order to meet deadlines.
8. Ability to exercise independent judgment.
9. Ability to read and understand financial statements of different types, including problem solving and analytical skills.
10. Ability to learn functions of all other County departments.
11. Ability to learn and apply a variety of codes, rules and regulations for required reports to different agencies.
12. Skill in effectively using oral and written communication in the performance of duties and responsibilities.
13. Ability to learn and implement county procedures, regulations and requirements with respect to procurement, budget, safety, operations and organization.

Essential Job Functions:**Physical:**

1. Ability to lift up to 50 pound boxes of records.
2. Ability to safely operate an automobile.
3. Ability to keyboard frequently to constantly.
4. Ability to sit for extended periods of time.

Mental:

1. Able to handle stressful situations including frequent deadline pressures and frustrated employees.
2. Ability to perform math computations.
3. Ability to read and comprehend complex rules, regulations and technical manuals.
4. Ability to work independently with little or no supervision.
5. Ability to read, write and comprehend English in order to read rules and regulations and complete reports.
6. Regular and predictable attendance.

Job Duties:**I. General Ledger**

- 1) Prepares internal revenue & expenditure reports by gathering and analyzing information from the general ledger system and from departments.
- 2) Analyzes information and options by developing spreadsheet reports; verifying information.
- 3) Prepares general ledger entries by maintaining records and files; reconciling accounts
- 4) Prepares and reviews payments by: reviewing weekly claims; assigning account numbers; requesting disbursements; and reconciling accounts.
- 5) Reconciles all fees, dues or funds of any description, or any account to which the county is entitled, and verifies they are deposited with the county treasurer.
- 6) Answers accounting and financial questions by researching and interpreting data.
- 7) Assists Finance Director in establishing and maintaining sound internal control procedures.
- 8) Protects county's value by maintaining information confidentiality.
- 9) Updates job knowledge by participating in educational opportunities; reading professional publications, maintaining personal networks, and participating in professional organizations.

II. Grants & Contracts Activities

- 1) Examines accounting and reporting for all grants, contracts, and agreements.
- 2) Assists Department Directors, grant and project managers, and other staff in planning, applying, budgeting, implementation, compliance and reporting for contracts, grants, and other projects.

III. Budget Support Activities

- 1) Various year-end adjustment entries including: accruals, etc.
- 2) Assist with draft budget document; attend Budget Committee hearings.

IV. Audit Activities

- 1) Assist auditors by answering questions, locating documents, explaining transactions, referring to other departments.

V. Performs other duties as assigned that support the overall objective of the position.

VI. Department Organization

- A. Communicate with other department employees to effectively and efficiently coordinate work programs.
- B. Communicate with employees from other departments and agencies in order to coordinate and implement the work program.

AGENDA ITEM COVER SHEET
Morrow County Board of Commissioners
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1. TITLE OF AGENDA ITEM: Boardman to Hemingway (B2H) amended preliminary Application for Site Certificate (apASC) DRAFT Comment Letter

2. ISSUES, BACKGROUND, AND DISCUSSION: While we are still waiting for the Bureau of Land Management (BLM) Record of Decision (ROD) based on the final Environmental Impact Statement (EIS), the applicant, Idaho Power Company, has submitted their apASC to the Oregon Department of Energy (ODOE). At this time ODOE staff are asking Special Advisory Groups (SAGs), of which the Board of Commissioners (BOC) are, for comment as to whether or not the apASC is complete. This is also an opportunity for the County to begin identifying Conditions of Approval that should be applied to the request.

3. OPTIONS: Comment, or not comment.

4. FISCAL IMPACT: This is hard to determine over the life of the application or the project. At this point staff time working on the apASC is recoverable through the ODOE.

5. STAFF RECOMMENDATIONS: Support the DRAFT letter and appoint Planning Director Carla McLane authority to send the letter prior to the September 1 deadline on behalf of the BOC.

6. SUGGESTED ACTION(S) / MOTION(S):

- Attached is the DRAFT Comment Letter dated September 1, 2017.

Routing: Original or copies of signed contract or document should be sent to the following:

- | | |
|---|---|
| <input type="checkbox"/> Clerk (Original for recording) | <input type="checkbox"/> Finance Department (Copy for file) |
| <input type="checkbox"/> Board of Commissioners (Copy for file) | <input type="checkbox"/> Department – For distribution |
| <input type="checkbox"/> Other _____ | |

Roberta Lutcher

From: Carla McLane
Sent: Tuesday, August 22, 2017 5:10 PM
To: Roberta Lutcher
Subject: B2H Comment Letter
Attachments: apASC Comment letter 08312017.pdf

Please note still DRAFT. Need to incorporate IPC conditions, suggested additions or amendments to those conditions, and comments received from Dave Pranger.

C.

August 31, 2017

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street NE, 1st Floor
Salem, OR 97301

RE: Boardman to Hemingway (B2H)
Comments on the amended preliminary Application for Site Certificate

Dear Ms. Tardaewether:

The following comments are on behalf of the Morrow County Board of Commissioners serving as a Special Advisory Group for this project. The Board of Commissioners did review the tenets of this letter at their regular meeting on August 23rd and supports the issues raised and the proposed Conditions of Approval incorporated.

Exhibit B - Project Description: The portion of Exhibit B of interest is the Road Classification Guide and Access Control Plan (Attachment B-5) as well as the 2017 Supplemental Siting Study (Attachment B-6). In both of these documents changes implementing the West of Bombing Range Road route are discussed. Morrow County does not have any specific comment to these documents, but want to state our support of the West of Bombing Range Road route because it limits direct impacts to irrigated agricultural to the east of the proposed route on highly productive agricultural land.

Exhibit C - Project Location: Once again interest is the West of Bombing Range Road route and how it will impact highly productive irrigated agriculture. Morrow County advocated for more of the West of Bombing Range Road route to be on land owned by the federal government and managed by the Department of Defense/Department of the Navy. It is those portions that will be east of the road that are of most concern to Morrow County. The more southern route, labeled "Sand Hollow-Whittaker Flats Alternative," proposed by Morrow and Umatilla Counties, was intended to further limit impacts to irrigated agriculture and residential uses. Our review will be to assure that is the case. It is within Attachment C-2 Proposed Route Location that the Multi-Use Areas and other installation impacts are identified.

Exhibit E - Permits for Construction and Operation: Morrow County would agree that the various local permits identified are correct. It should be noted, however, that the contact for permits through Morrow County Public Works needs to be updated. Bob Nairns has retired; his replacement is Matt Scrivner. [See page E-27.]

Exhibit G- Materials Analysis: Attachments G1 through G3 represent various correspondence with concrete and aggregate suppliers throughout the project area. The information is dated,

Boardman to Hemingway
Comments to the amended preliminary Application for Site Certificate

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with letters to and responses from various suppliers dating to Spring of 2012. This specific information may not tie specifically to a standard, but it is worth noting that there have been changes in suppliers in Morrow County and current operators are not identified and should be considered prior to the start of construction.

Exhibit K - Land Use: The following are errors or portions of the application that are confusing and should be corrected:

- At 4.1.2.7 Longhorn Station the applicant identifies that the location of the proposed Longhorn Station is zoned Exclusive Farm Use; that area was subject to a rezone in 2011 changing it to Port Industrial.
- Throughout the application, not just Exhibit K, a road is identified as Pine City Road. Planning staff cannot find a Pine City Road. It appears that the identified road is actually Little Butter Creek Road.
- 5.4.2.4 Major road or Railroad Right-of Way Zone MCZO Provisions - Not sure what this is getting to. The MCZO identifies the center of a right-of-way as the point zoning districts change. All road rights-of-way are zoned, generally the adjoining zoning district. On Figure K-17 those lands would be zoned Port Industrial, General Industrial or Exclusive Farm Use.
- The requirement to review and consider both the Cecil General Store and the Willow Creek Campground were based on the original terminus of either Horn Butte or Grassland substations. With Longhorn being the terminus neither should be impacted.

Morrow County supports the following applicant submitted conditions [insert conditions] and requests the following conditions of approval be added [insert conditions concerned with obtaining a conditional use permit and zoning permit as required by ORS 469.401(3).]

Exhibit O - Water Use:

3.4 Water Sources and Estimated Amounts: At the end of this section it states that “the amount of water required for operation of the Project is minor. The restroom facility at the Longhorn Station is estimated to use approximately 30 gallons per day. This facility will be connected to the City of Boardman’s water and sewer system.” This is only partially correct as the proposed Longhorn Station is not in the City of Boardman city limits and would therefore be provided by the Port of Morrow (although domestic waste water is completed under contract with the City of Boardman).

Exhibit P1 - Fish and Wildlife Habitat and Species: Morrow County has interest in the following three identified habitat Plans: the Reclamation and Revegetation Plan, the Vegetation Management Plan and the Noxious Weed Plan. All three have impacts to agricultural lands and need to be well written and adhered to. Morrow County supports the applicant supplied Conditions of Approval, but want to further request that all three, but most importantly the Noxious Weed Plan, be reviewed by the Morrow County Weed Inspector, currently Dave Pranger. [Additional comments and conditions forthcoming from Dave.]

Exhibit Q - Threatened and Endangered Plant and Animal Species: The interest in this section is the discussion related to the Washington Ground Squirrel (WAGS). The only comment Morrow County can supply is that the WAGS is identified within the Morrow County Comprehensive Plan, which is given consideration within Exhibit K on pages K-93 through K-94.

The County also can support the joint decision to delay future WAGS surveys to be aligned with the development time line as discussed on page Q-11.

Exhibit T - Recreation: Blue Mountain Century Scenic Bikeway - consider for mitigation development of a rest stop along the route...

Exhibit U - Public Services: The two plans of concern within Exhibit U are the Transportation and Traffic Plan and the Fire Prevention and Suppression Plan. Morrow County Public Works did review the Transportation and Traffic Plan and found no outstanding concerns; the proposed Conditions of Approval are supported [as amended].

Exhibit V - Solid Waste and Wastewater Minimization: The applicant has indicated that they will produce, prior to construction, a Construction Waste Management Plan. Morrow County would like to be involved in review of this Plan to assure that it addresses issues concerned with the Morrow County Waste Shed and is in compliance with the Morrow County Solid Waste Management Plan and Ordinance. This Ordinance is discussed in Exhibit K at 5.4.6.3 and pages K-105 through K-107. Morrow County would request the following Condition of Approval be incorporated, either at Exhibit V or Exhibit K: [insert waste shed reporting; use of local landfill; and other appropriate condition(s).]

Exhibit X - Noise: There are six noise sensitive receptors (NSRs) in Morrow County, none identified as requiring an exemption from state requirements concerning noise. Morrow County would support and incorporate the following Conditions of Approval: [insert noise control conditions 1 through 3]

Thanks for the opportunity to comment on the amended preliminary Application for Site Certificate. It has been a pleasure working with you and other Department staff to date, and I anticipate that will continue. Should you have any questions about this comment letter, previous comment letters, or need additional information, please do not hesitate to contact me.

Cordially,

Carla McLane
Planning Director

cc: Jeff Maffuccio, Idaho Power Company
Morrow County Board of Commissioners
Burke O'Brien, Morrow County Public Works
Matt Scrivner, Morrow County Public Works
Sandra Putman, Morrow County Public Works
Dave Pranger, Morrow County Weed Program