



# City of Aurora

FOUNDED IN 1856  
"National Historic Site"

Alana J. Cox  
Policy and Technical Services Manager  
DCBS-Building Codes Division  
1535 Edgewater St NW  
Salem, OR 97304

Alana,

As a member of the Building Codes Division Rulemaking Advisory Committee regarding the use of third-party building officials, I would like to express my profound disappointment at the draft rules currently being circulated in advance of the August 7 meeting.

For almost two years now, many of us have worked in good faith to try and find resolution to the issues that have been brought up by the legal opinions issued by the Oregon Attorney General's Office. We've given up significant time to attend these meetings in the hopes that our input, as stakeholders, would be considered.

A letter was submitted June 18 in which the RAC's municipal representatives suggested language for possible rulemaking adoption. Based on the rules I've seen proposed, it would appear that our collective input has been completely ignored. Instead, what is being presented closely resembles the same rules that the cities fought against when this process first started.

I believe that there are ways for this committee to resolve these issues in a way that will work for everyone involved. Senate Bill 1047 from the 2019 session includes language that could go a long way towards providing solutions. It is my most sincere hope that the committee will consider what the municipalities have put forth, instead of giving the appearance that our efforts have been futile in the face of predetermined outcomes.

Sincerely,

A handwritten signature in blue ink, appearing to read "W. Scott Jorgensen".

W. Scott Jorgensen, Executive MPA  
City Recorder, City of Aurora