



# CITY OF CLATSKANIE

---

July 30<sup>th</sup>, 2020

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

Dear Alana;

As a member of the Building Codes Division Rulemaking Advisory Committee (RAC), I have had a chance to review the proposed administrative rules set for discussion at the August 7<sup>th</sup>, 2020 RAC meeting. Unfortunately, I will be unable to participate at that meeting and I am writing my comments for the record in this letter. Needless to say, after reviewing the proposed rules, I am utterly disappointed in what has been proposed. It appears that the BCD has taken no effort, no contemplation, or no consideration of the concerns and suggestions raised by members of the RAC who represent small municipalities.

Two years ago, at the Coastal Caucus Economic summit, I was fortunate enough to participate in a panel discussion on this issue. At that meeting, we received pledges of cooperation from BCD to find a mutual solution. It appears, by virtue of the draft rules for consideration, that BCD just paid us lip-service and completely ignored our concerns. It makes one wonder if the RAC was just a placation attempt to window-dress an issue that BCD had no intention of compromising or finding a solution on.

If the proposed rule were to be adopted, then I would like advice from BCD as to whom, on my 10-employee city payroll, I need to lay off to accommodate the hiring of a Building Official? As I have stated many times before, I use third party vendors for several city services such as City Attorney, Planner, and even my Police Department.

On June 18<sup>th</sup>, the municipal representatives on the RAC submitted a letter to this committee with possible solutions to the issue including re-visiting language that was proposed in SB 1047 from the last full legislative session in 2019. Why has this not been looked at? The purpose of this RAC was to find a solution, so let's find a solution.

Again, to BCD, listen. Listen to the concerns of small cities and our need for third party Building Officials and inspectors. Use this RAC to find the solution. It is out there. Thank you.

A handwritten signature in blue ink, appearing to read "G. Hinkelman".

Greg Hinkelman  
City Manager, Clatskanie