



August 6, 2020

To: Program Delegation Rulemaking Advisory Committee

From: Suzie Dahl, Building Official, Columbia County Oregon

Subject: Program Delegation Rules-Draft

### Topic 1- Building Official Employment

#### 918-020-0090 Program Standards

**(m)(B)(i) Five or more years of experience performing A-level structural inspections under an appropriate certification;**

**(m)(B)(ii) Five or more years of experience performing A-level structural plan reviews under an appropriate certification; or...**

While I find the importance of qualified, certified Building Officials, I find the language of 5 years of experience as an A-level inspector or plans examiner quite excessive and doesn't take into account actual experience of a person who has worked in commercial construction or as a general contractor or how many years as a certified residential inspector.

Due to the recent turnover by retiring Building Officials and placing a 5 year experience restriction many current jurisdictions won't have qualified Building Officials by these rules. There should be some retroactive approach for persons who have been working as full time Building Officials in their jurisdictions and also take into account their prior work experience in construction in combination with their time as an A-level inspector or plans examiner and/or reduce to 3 years A-level experience.

Many small jurisdictions only have one Building Official that is also the only inspector. If that newer Building Official has only 2 years A-level experience are they going to lose their job and force that jurisdiction the need to combine with another jurisdiction? Or what if there's a situation where you have two jurisdictions each with one Building Official, they form an IGA so both Building Officials can be employed, however their combined experience is only equal to 4 years? They will both lose their job and the State will need to pick up the slack until a person with 5 years A-level applies for the position.

#### **Topic 4- Fiscal Impact**

The financial hardship will fall not only on the jurisdiction to find qualified people, but also to the State BCD to provide additional services for those jurisdictions without a Building Official now due to the rules; some jurisdictions may choose not have the Building program and hand it back to the State.

I think it prudent to look at the requirements that are proposed and allow less years of experience coupled with prior construction experience for jurisdictions with current full time Building Officials.

Cordially,

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