CITY OF
ESTACADA
unexpected / untamed / unforgettable

August 6, 2020

Oregon Building Codes Division
Attention: DCBS Administrator, Rules Advisory Committee Members
C/O Alana Cox

Dear Ms. Cox,

The City of Estacada appreciates the opportunity to provide testimony on the draft rules for the Building Codes Division. It is our understanding that the draft rules ignore the input of the committee and reissue past concepts that we opposed when this process first began.

Estacada is a small city that is working diligently to provide services to our community. Affordable housing is a concern that we continue to address, and which may be negatively impacted by the latest draft rules that are being considered.

Items of special concern to the City of Estacada include:

1) **Building Official Employment** – the latest draft of the rules provides that each municipality must directly employ a building official or combine with other municipalities in the employment of a building official

   As a small rural city, the City of Estacada would not be able to hire a full-time building official and would be required to enter an IGA with other local municipalities. This may bring about economic hardships as well as delays in services.

2) **Process and timing** – The deadline of January 1, 2021, to apply for a renewal of our program is unrealistic considering the efforts to respond to and recover from the COVID-19 pandemic. Especially as a small city, the January 1, 2021, deadline poses a hardship.

3) **Fiscal Impact** – It would be extremely difficult for the City of Estacada to hire a full-time building official. Currently, we do have significant development occurring but there have been many years where that has not been the case. Using the 3rd party building official and inspector has allowed us to fund this service on an as-needed basis and therefore not have to take budget away from other programs to cover the cost of building officials.

The City of Estacada understands that the current system needs to be amended, however, the draft rules presented do not take into consideration the impact on small rural cities. We request that the committee considers what the municipalities have contributed to identify a solution that aligns with the direction of the AG without bringing about unnecessary hardships.

Respectfully,

Denise Carey

Denise Carey
City Manager