

August 6, 2020

Rulemaking Advisory Committee  
Dept of Consumer and Business Services, Building Codes Division  
Re: Program Delegation

Dear members of the committee,

It appears the quick and thought-less rules being proposed by the RAC have not taken considerations into account that will adversely effect thousands to hundreds of thousands of Oregonians.

1. How can small rural territories with budgets currently being stripped be asked to create positions it cannot afford?
2. How can the counties keep up as defaulted responsible Building Departments, when their own territories and responsibilities are currently being stretched beyond their limits? The state cannot keep up with their own rules for maintain time frames for plan review an inspection. Clearly violating state law.
3. Building Departments are already ordained to utilize ONLY their permit fees to maintain their departments. There is no allowable path to expand their budgets to pull form other departments to maintain operations. Explain ho this will be impacted by these rules for ALL jurisdictions.
4. How can judges, planners, fire chiefs, and other contracted municipal positions be allowed to operate as a Third-Party without the same inherent concerns? Yet we are technically trained (some ONLY by the State, some by ICC, some with both), experienced building inspectors, plans examiners having all the same (and more) qualifications as required by the State of Oregon be allowed the graces of performing their duties, yet a building department be held to such different standards especially regarding their community's public health and safety.

As an employed member of a team in third-party, the opportunities to expand my knowledge, and perform at a higher level of understanding in the field of code enforcement is something taken very seriously. We do this work usually because it eliminates the politics, and we can simply do our job. That while making a living wage, with benefits that support our families, and in turn benefit our communities. We work together with our partnered cities to create a healthy dialogue, and guidance for those very small jurisdictions that need the support. It is encouraging to see how many cities call upon us throughout the State of Oregon. We touch every border with our services. This is a satisfying form of employment, and one that impacts so many communities around the state.

Please take a pause on these rules. The timing could not be worse. The economic climate could not be worse. That paired with a boom in construction, these communities are going to bear the brunt of these rules in such a negative way, that it is clear these new rules will once again need to be changed due to the unnecessary hardships the state will be imposing on these communities.

I love my job. I love the communities we help. But I will not be inclined to be a direct employee for a jurisdiction simply because the state declares it so. Private companies are efficient with resources without the need to satisfy the best friend builder of the mayor. We are not the problem in this equation. Allow us to keep helping Oregon as we have since 1973.

Thank you,

Michele Linbarger