

April 15, 2015

PWR Coordinator  
Bureau of Labor and Industries  
800 NE Oregon Street, Suite 1045  
Portland, OR 97232

**Re: Response to Request** to revised BOLI Power Equipment Operator definition adding the Chief [subclassification to Group 2 made](#) by the International Union of Operating Engineers/Local 701

Dear PWR Coordinator:

This letter is in response to the requested revision of the BOLI Power Equipment Operator definition by adding the Party Chief subclassification to Group 2 made by the International Union of Operating Engineers/Local 701 (“Union”) and submitted to BOLI for review.

We oppose a change in the definition to include “Party Chief” as a subclassification for several reasons and believe that no action is needed by BOLI.

Parametrix includes engineers, scientists, planners, surveyors, and construction managers dedicated to providing outstanding service to our clients. In addition to offices located throughout the western United States, we have more than 60 staff residing in our Portland and Bend Offices. Our firm provides survey services in support of the design and construction of projects for various public and private clients in Oregon. Parametrix fields up to eight field survey crews and employs Party Chiefs to oversee the field crews.

The factual background provided by the Union letter is not an accurate depiction of survey services including the role of the Party Chief. The duties of a Party Chief were not adequately represented. Our survey crews work under the direct supervision of a Licensed Professional Surveyor. The Party Chief is knowledgeable about the methodology and mathematics used to perform accurate surveys in addition to the equipment and software utilized to assist with these duties. They focus on the intellectual portion of survey projects and generally no more than 20 percent of their work is physical in nature. The advancement of the technology has lessened the physical aspects of this job but has increased the need for the individuals in the field to understand the process, equipment and software more. The survey Party Chief is responsible for directing the field crews in various tasks needed to measure and collect the data. The Party Chief must accurately calculate the data in the field as a check and review of the measurements. The Party Chief is responsible for calibrating equipment, troubleshooting issues and quality checks to coordinate the design intent with construction efforts. Modern survey work relies less on physical labor because the equipment is lighter and involves more complex technology than in the past. No longer does the survey crew need to place physical stakes because the advanced technology is able to place a digital stake. The programs they run are more complex from resection of coordinates, applying 3D alignments, to setting up machine grading. Survey crews are not building forms and using grade lasers for setting grade. These are tasks for carpenters and grade hops that can also run a backhoe or other heavy equipment.

The Union is incorrect in the job description provided for “Party Chief,” they also fail to provide a distinction for the position that is not already addressed in other standard BOLI occupational definitions. There is no value in adding another “title” and new subclassification unless the physical aspect of the work is different. The physical descriptions

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of the work provided by the Union is already covered under the current BOLI definitions of "Stake Setter," "Brush Cutter" and "Stake Chaser."

We have reviewed the letter prepared by Mr. Sean Gay of Stoel Rives LLP on behalf of David

Evans and Associates, Inc. and agree with his evaluation of the issue. We incorporate the letter submitted by Mr. Sean Gay into this letter by reference, including the analysis and statements made in objection to the request made by the Union.

Finally Parametrix' submission of this response is not a waiver of any rights or remedies under the law (including, but not limited to, the Oregon Administrative Procedures Act), all of which are reserved. We appreciate the consideration of the PWR Committee in evaluating this issue and considering our perspective as a company that provides surveying services.

Sincerely,

**Parametrix**



**Richard Roché, RG, LHG**  
Vice President