



**City of Portland, Oregon**  
**Bureau of Development Services**  
**Office of the Director**  
**FROM CONCEPT TO CONSTRUCTION**

Chloe Eudaly, Commissioner  
Paul L. Scarlett, Director  
Phone: (503) 823-7308  
Fax: (503) 823-7250  
TTY: (503) 823-6868  
[www.portlandoregon.gov/bds](http://www.portlandoregon.gov/bds)

February 15, 2017

Representative Paul Holvey, Chair  
House Committee on Business and Labor  
900 Court Street, NE, Hearing Room E  
Salem, OR 97301

**Re: HB 2168 - Requiring municipalities performing state building code inspections to provide the equipment necessary to perform inspections**

Dear Chair Holvey and Members of the Committee:

Thank you for the opportunity to provide comments on HB 2168, which would require municipalities that perform state building code inspections to provide their own equipment to perform the inspections. Because doing so would be impractical in many instances, we respectfully request that you oppose HB 2168. For example, the bill would require all of our inspectors to carry their own ladders to every inspection. While this may not seem like a huge imposition, most of the vehicles in our inspection fleet are energy-efficient cars with no capacity to mount a large ladder. Moreover, we employ dozens of inspectors, each of whom would need to carry every conceivable tool, ladder, etc. for every inspection. In addition, having to mount, unmount, pack and unpack all equipment for each inspection would significantly increase the time required for each inspection, thus decreasing by approximately half the number of inspections we could conduct each day. We currently receive hundreds of inspection requests daily. Halving the number of inspections we could conduct would require us to hire more inspectors, purchase more vehicles and purchase inspection equipment for each inspector. Those costs would, of course, need to be passed on to the customers in the way of higher permit fees.

Moreover, for larger construction projects, such as high-rise buildings, the bill would lead to absurd results. For example, accessing higher floors requires scaffolding. Clearly an inspector cannot "bring their own" scaffolding. Thus, the inspector would be forced to assume the risk of any injuries sustained using the contractor's scaffolding, regardless of whether it is negligently constructed, with no legal recourse.

We respectfully recommend that you decline to move HB 2168 forward.

Sincerely,

A handwritten signature in blue ink, appearing to read "P. Scarlett".

Paul L. Scarlett, Director  
Bureau of Development Services