



Oregon

Tina Kotek, Governor



Department of Consumer
and Business Services

March 27, 2025

Chair Sosa, Vice Chairs Chaichi and Osborne, and members of the House Committee on Commerce and Consumer Protection:

I am the Administrator for the Building Codes Division of the Department of Consumer and Business Services. The Building Codes Division (BCD) administers Oregon's Statewide Building Code, which provides uniform standards that ensure newly constructed residential and commercial buildings are safe for citizens to occupy. Among other responsibilities, BCD professional staff provide support for seven volunteer advisory boards, including Oregon's Building Codes Structures Board (BCSB). The main responsibility of the BCSB is to partner with BCD on the administration of Oregon's structural program, including code adoption.

I write to give technical feedback on HB 2141, specifically to conceptual amendments described in the public hearing held by the committee on Tuesday, June 25, 2025. HB 2141 generally regards the creation of a new professional registry for commercial interior designers. The introduced version of the bill includes the requirement that this registry be the responsibility of the State Board of Architect Examiners (SBAE). In the hearing, testimony described potential amendments that are not, as of the drafting of this letter, publicly available. These potential amendments would move the responsibility of the registry from the SBAE, perhaps to the BCSB.

Whether and how to create the registry envisioned by the bill is a policy choice. In making this choice, please consider the following technical feedback:

- BCD, like local building departments across Oregon, is responding to the direction of Governor Kotek and the legislature to enable the creation of new housing stock in Oregon. The BCSB is focused on making new housing and clearing any structural pathways to enable construction of commercial and complex buildings in Oregon, including multifamily housing.
- HB 2141 would, as described, complicate building permitting. It could add new requirements and a new "stamp" to the system. HB 2141 would add complexity to permitting at a time when the policy goal of the state is streamline housing construction and creation and make permitting simpler.
- The BCSB does not have any interior design expertise. The board is a structural board. Excepting a very narrow category of item flammability, there is no overlap in expertise.
- The registry contemplated in the bill would likely have to be treated as a license requirement. The BCSB has no licensure authority or expertise. While BCD has some licensure mandates in other program areas, this would be new work to the BCSB, which is not a licensing board.



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- In a licensure system, the license cost is determined, in large part, by the number of licensees that participate. Given the relatively small number of potential commercial interior designers mentioned in testimony (hundreds), it is reasonable to expect that participation in this registry/license could be prohibitively expensive for an individual. Creating an expensive license that did not previously exist could be a substantial barrier to entry for Oregonians that do not have institutional support from a large company or firm.

Given all the above, I believe the draft amendments would be potentially expensive to implement, potentially add complexity to permitting, and outside the scope of the existing authority of the BCSB. Prior to the March 25 public hearing, BCD staff met with the bill proponents and delivered this feedback. However, given the pressure of the legislative timeline, it is important that the committee have the above information for consideration as new amendments become available.

As mentioned previously, I write to give the committee this feedback on the bill. The BCD does not have a position on the measure. If asked or invited, then I am happy to answer questions of the committee or individual legislators.

Thank you,



Alana J. Cox
Administrator
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