# Town of Paradise
# Building Division Corrective Action Plan Committee Agenda
# 1:00 PM – November 5, 2026

## Doug LaMalfa Town Council Chambers–5555 Skyway, Paradise, CA

In accordance with the Americans with Disabilities Act, if you need a special accommodation to participate, please contact the Town Clerk's Dept., at 872-6291 at least 48 hours in advance of the meeting. Hearing assistance devices for the hearing impaired are available from the Town Clerk.

All writings or documents which are related to any item on an open session agenda and which are distributed to a majority of the Town Council will be available for public inspection at the Town Hall in the Town Clerk Department at 5555 Skyway, at the same time the subject writing or document is distributed to a majority of the subject body. Regular business hours are Monday through Thursday from 8:00 a.m. to 5:00 p.m.

### 1. OPENING

1a. Call to Order

1b. Pledge of Allegiance to the Flag of the United States of America

1c. Roll Call

### 2. REVIEW AND DISCUSSION

2a. Corrective Action Plan Background and Quarterly Updates

2b. Building Division Implementation Status Update

2c. Building Code Complaint Ordinance Update

2d. Future Meetings

### 3. PUBLIC COMMUNICATION

### 4. ADJOURNMENT

STATE OF CALIFORNIA ) SS.
COUNTY OF BUTTE )

I declare under penalty of perjury that I am employed by the Town of Paradise in the Town Clerk's Department and that I posted this Agenda on the bulletin Board both inside and outside of Town Hall on the following date:

_____

_____
TOWN/ASSISTANT TOWN CLERK SIGNATURE

**Town of Paradise**

**CAP Standing Committee** **Agenda Item: 2a**

**Date: November 5, 2026**

**ORIGINATED BY:** Marc Mattox, Assistant Town Manager

**SUBJECT:** Corrective Action Plan Background and Quarterly Updates

**REQUESTED ACTION:** None, Information Only

**Executive Summary**

This item provides background on the Building Division CAP and summarizes progress reported in the first and second quarterly updates. The updates document implementation of corrective actions, including independent quality assurance, the Building Code complaint process, staff training, standardized procedures, and public access to information.

**Background and Purpose**:

The Town Council adopted the 2025 Building Division Audit Corrective Action Plan on February 10, 2026. The CAP established a framework for addressing the audit's findings and tracking improvements to Building Division operations.

The first quarterly update, reviewed by the Town Council on June 9, 2026, reported on implementation through May 30. Highlights included engaging an independent reviewer, adopting Ordinance No. 655 to establish a Building Code complaint process, and creating a community intake form.

The second quarterly update, reviewed by the Town Council on September 8, 2026, covered June through August. It summarized the Town's response to the Butte County Civil Grand Jury reports, continued implementation of the complaint process and independent review, improvements to the public dashboard, and progress on CAP actions.

Together, the adopted CAP and quarterly updates provide the framework and record of the Town's corrective actions and ongoing implementation.

**Fiscal Impact**

No fiscal determination is made in this report.

**Recommended Committee Action**

None, background information only.

**Attachments**

1) 2025 Building Division Audit CAP – Approved February 10, 2026
2) 2025 Building Division Audit CAP Quarterly Update 1 – Approved June 9, 2026
3) 2025 Building Division Audit CAP Quarterly Update 2 – Approved September 8, 2026

# 2025 Building Division Audit Corrective Action Plan

*RESTORING COMMUNITY CONFIDENCE THROUGH IMPLEMENTATION*

APPROVED BY TOWN COUNCIL FEBRUARY 10, 2026

**Prepared by:**

Marc Mattox
Assistant Town Manager

## Table of Contents

1. Statement of Purpose and Community Commitment ..... 2
2. Intended Use of This Document ..... 3
3. Background and Context ..... 4
4. Post-Fire Recovery Context and 2025 Audit ..... 5
    4.1 Scale and Complexity of the Rebuild Environment ..... 5
    4.2 Recognizing the Contributions and Challenges of Staff ..... 5
    4.3 Introduction of Fire-Resilient and Innovative Construction Methods ..... 5
    4.4 Limitations of the 2025 Audit Sample ..... 6
5. Commitment to Expanded Analysis and Data-Driven Evaluation ..... 7
    5.1 Need for Statistically Meaningful Metrics ..... 7
    5.2 Types of Data the Town Will Compile ..... 7
    5.3 How the Expanded Analysis Supports Public Confidence ..... 7
    5.4 Defining Appropriate Pathways for Homeowners with Concerns ..... 7
    5.5 Commitment to Publishing Findings and Updating Metrics ..... 8
6. Corrective Action Framework and Implementation Matrix ..... 9
    6.1 Purpose and Scope of the Corrective Action Framework ..... 9
    6.2 Recommendation-to-Action Flow ..... 9
    6.3 Tracking, Accountability, and Interpretation of CAP Progress ..... 9
    6.4 How to Read the Corrective Action Matrix ..... 10
    6.5 Corrective Action Matrix Organization and Recommendation Inventory ..... 10
    6.6 Corrective Action Matrix ..... 11
7. Proposed CAP Timeline ..... 20
8. Public Reporting, Transparency, and Advisory Oversight ..... 21
    8.1 Public Reporting Commitments ..... 21
    8.2 Adapted Ad Hoc Advisory Committee ..... 21

## 1. Statement of Purpose and Community Commitment

The Town of Paradise recognizes that homes represent far more than structures—they reflect safety, stability, financial investment, and a sense of security for individuals and families rebuilding their lives following the 2018 Camp Fire. For a community recovering from such a profound loss, concerns raised regarding construction quality, permitting, and inspections are taken seriously because of the real and lasting impacts that deficiencies can have when expectations of safety and reliability are not met.

Responsibility for construction compliance rests with builders and design professionals; however, the Town acknowledges its essential role in administering building permits and inspections intended to promote safety, consistency, and accountability. When concerns are brought forward—whether through formal complaints, public meetings, or other channels—they provide valuable insight into how systems are functioning and where improvements may be needed, particularly in a rebuilding environment marked by urgency, complexity, and heightened community expectations.

This Corrective Action Plan responds to concerns identified to date while also recognizing the importance of continuing to surface, evaluate, and learn from additional input as implementation proceeds. Reviewing known concerns, inviting further feedback, and strengthening intake and quality assurance processes are central to identifying issues early, improving outcomes over time, and supporting confidence in the rebuilding process.

## 2. Intended Use of This Document

This Corrective Action Plan (CAP) is a foundational accountability document developed in response to the 2025 independent audit of the Building Division. It establishes a clear, traceable, and durable framework for documenting the actions the Town has taken—and will continue to take—to address organizational, procedural, and operational findings identified through the audit and subsequent efforts.

The CAP serves as a roadmap for implementation, oversight, and reporting. It is designed to support responsible governance, guide staff execution, and provide transparency to the Town Council and the public. The document will be updated periodically to reflect progress, lessons learned, and refinements as corrective actions are implemented.

## 3. Background and Context

In August 2025, following ongoing community concerns related to rebuilding timelines, permit consistency, and inspection reliability during the post–Camp Fire recovery period, the Town initiated an independent audit to evaluate Building Division permitting and inspection practices. The audit identified opportunities to improve permit intake processes, inspector training, oversight, and documentation protocols. While no illegal wrongdoing was found, the review underscored the need for clearer procedures, stronger internal controls, and more consistent application of adopted building standards in order to enhance accountability and restore public confidence.

This Corrective Action Plan translates those findings, along with subsequent organizational review by Town staff, into specific and trackable corrective actions. Its purpose is not only to resolve identified deficiencies, but also to establish a durable framework for continuous improvement, accountability, and transparency.

Community confidence in the rebuilding process depends on both technical compliance with building codes and the ability of residents to understand how concerns are evaluated and addressed. This CAP serves as a public-facing roadmap that documents corrective actions, explains how progress will be measured, and demonstrates the Town's commitment to strengthening Building Division operations over time.

By aligning audit-driven improvements with structured reporting and community engagement, the Town seeks to reinforce trust, support homeowners and builders, and ensure that rebuilding efforts continue in a manner that is safe, consistent, and responsive to community expectations.

## 4. Post-Fire Recovery Context and 2025 Audit

### 4.1 Scale and Complexity of the Rebuild Environment

The 2025 Building Division Audit provides a helpful snapshot of issues requiring correction; however, it represents a limited view of a far larger operational environment. Since the Camp Fire in 2018, the Town of Paradise has undertaken one of the most extensive residential rebuilding efforts in California. Since the rebuild began in earnest in early 2020, the Building Division has processed 3,666 single-family residential building permit applications, resulting in 3,016 Certificates of Occupancy issued. In addition, 1,022 multi-family unit applications have been processed, with 683 Certificates of Occupancy issued to date. The rebuilding effort has created a surge of work unmatched in the Town's history, requiring constant adaptation to high-volume demand, evolving regulatory expectations, and community pressures for rapid permitting and inspection timelines.

### 4.2 Recognizing the Contributions and Challenges of Staff

Throughout this period of accelerated rebuilding activity, Building Division staff have:

- Successfully processed thousands of permits and inspection requests,
- Supported residents rebuilding under difficult personal and economic circumstances,
- Adapted to new materials and code requirements with limited precedent or training resources available at the time,
- Maintained service availability despite staffing fluctuations, procedural changes, and an unusually high volume of work.

The CAP aims to build upon these contributions, address identified process gaps and ensure the Building Division is equipped to operate effectively within a modern, resilient building environment.

### 4.3 Introduction of Fire-Resilient and Innovative Construction Methods

A unique aspect of the Town's post-fire recovery is the substantial introduction of innovative construction technologies and fire-resilient building systems—many of which had not been widely used, or used at all, in Paradise prior to 2018. These include:

- Enhanced wildland–urban interface (WUI) compliance requirements,
- Nontraditional roofing, siding, and venting assemblies,
- Advanced ember-resistant construction methods,
- New insulation and energy-performance products,
- More complex structural and foundation systems related to fire-damaged soils,
- Emerging materials promoted for enhanced fire resistance or environmental performance.

Because these systems were new to many contractors, designers, and staff, the Building Division has had to:

- Learn and interpret new product listings, installation standards, and manufacturer specifications,
- Update internal procedures to align with continuously evolving state and national codes,
- Assess building methods not previously encountered in the Town's traditional residential portfolio,

- Balance life-safety and compliance while supporting homeowners who wish to adopt innovative, resilient solutions.

This environment created a steep learning curve for the entire rebuild community—builders, design professionals, inspectors, and permitting staff alike. The Town recognizes this complexity and is committed to using the CAP not only to correct identified gaps but also to strengthen the institutional capacity necessary to support a more advanced, resilient, and fire-hardened building environment.

### 4.4 Limitations of the 2025 Audit Sample

The 2025 Building Division Audit identified issues that warrant corrective action and organizational improvement. The Town recognizes that each concern reviewed through the audit reflects a real homeowner experience and that deficiencies—regardless of how they are identified—must be addressed thoroughly and responsibly.

The audit was initiated to promptly review a defined set of escalated concerns related to Building Division permitting and inspection practices during the post-fire rebuilding period. Its purpose was to identify potential process gaps, training needs, and near-term organizational improvements, rather than to serve as a comprehensive evaluation of all Building Division activity following the Camp Fire.

The Town accepts the audit's findings and recommendations as valid within their scope and is committed to implementing corrective actions where issues were identified. At the same time, the Town recognizes the importance of evaluating overall performance within the context of the full range of work performed and the operational environment in which rebuilding has occurred.

The Town further acknowledges that the absence of statistical representativeness does not lessen the significance of individual homeowner concerns or the need to address them carefully and transparently. These considerations underscore the importance of supplementing the audit with broader, data-driven analysis to inform ongoing corrective actions and performance evaluation.

As described in the following section, the Town will undertake expanded analysis to establish meaningful performance metrics, evaluate trends across permitting and inspection categories, and provide the community with a more complete understanding of both areas of strength and opportunities for continued improvement. It is anticipated that this broader analysis will inform future updates to the CAP and identify additional improvement actions as appropriate.

## 5. Commitment to Expanded Analysis and Data-Driven Evaluation

### 5.1 Need for Statistically Meaningful Metrics

To provide the public, Town Council, regional partners, and oversight bodies with a full understanding of the Building Division's performance, the Town will conduct broader and more systematic analysis beyond the scope of the original audit. This analysis is necessary to:

- Understand trends and volumes across all permit types,
- Identify meaningful indicators of inspection quality,
- Differentiate isolated issues from systemic gaps,
- Enhance transparency into the Town's ongoing rebuilding efforts.

### 5.2 Types of Data the Town Will Compile

The Town will compile, analyze, and publish available data sets, including, but not limited to:

- Permitting Data
- Inspection Data
- Certificate of Occupancy Data
- Contractor-Related Data

### 5.3 How the Expanded Analysis Supports Public Confidence

By establishing statistically relevant datasets, the Town can:

- Distinguish between isolated incidents and patterns of concern,
- Provide clearer context for the rate of inspection errors (if any) relative to total volume,
- Demonstrate when inspection performance is consistent with industry norms,
- Identify new areas where process improvements are warranted,
- Help homeowners understand the most appropriate pathways for their individual concerns.

### 5.4 Defining Appropriate Pathways for Homeowners with Concerns

The expanded analysis will also support the creation of a homeowner resolution framework. This framework recognizes that not all concerns identified by homeowners fall within municipal jurisdiction.

Based on statistical context and inspection records, some homeowners may be better served through:

- Contractor warranties,
- Bond claims,
- California Contractors State License Board (CSLB) actions,
- Private home inspections,
- Industry-standard defect resolution processes, or
- Ombudsman-guided navigation, as recommended in the audit.

The Town will provide clear guidance to help residents understand:

1. Whether their issue is likely related to inspection oversight,

2. Whether the issue is a workmanship or contractor performance matter,
3. What type of recourse is available under California law,
4. How to pursue resolution with the appropriate party.

This structured pathway will help ensure that homeowners receive clear, accurate information and that Building Division staff focus on matters within municipal scope.

These pathways are intended to complement—not replace—the Town's ongoing efforts to improve early detection of deficiencies and reduce the likelihood that issues persist through final inspection and occupancy.

### 5.5 Commitment to Publishing Findings and Updating Metrics

The Town will publish periodic reports summarizing:

- Key datasets and trends,
- Findings from expanded analysis,
- Updated metrics and evaluation tools,
- Improvement initiatives resulting from performance review.

These findings will be incorporated into future CAP updates and may inform additional corrective actions or operational reforms.

## 6. Corrective Action Framework and Implementation Matrix

This section describes the framework through which the Town translates audit findings and internally identified improvement opportunities into actionable, trackable corrective actions, and explains how implementation progress is documented, interpreted, and reviewed. The Corrective Action Matrix presented in this section serves as the primary implementation and accountability tool for this Corrective Action Plan (CAP).

### 6.1 Purpose and Scope of the Corrective Action Framework

The Corrective Action Framework establishes a structured, transparent approach for responding to the 2025 Building Division Audit and for strengthening Building Division operations over time. The framework is designed to ensure that recommendations are evaluated consistently, assigned to responsible parties, implemented through defined actions, and tracked using objective criteria. It supports responsible governance, operational accountability, and clear communication with the Town Council, staff, and the public.

### 6.2 Recommendation-to-Action Flow

Audit findings and internally identified improvement opportunities are processed through a standardized sequence: identification of the recommendation; internal assessment; assignment to a responsible division or role; development of specific corrective actions; execution with defined milestones; and documentation of implementation progress. Where alternative approaches are selected, the rationale is documented to maintain transparency and institutional clarity.

### 6.3 Tracking, Accountability, and Interpretation of CAP Progress

Implementation progress is tracked through the Corrective Action Matrix contained in this section. The matrix provides a structured, point-in-time record of each corrective action, including its lifecycle stage and a narrative summary of actions taken or underway as of the date of each update.

Each corrective action is assigned an Implementation Phase (e.g., Initiated, Ongoing, Substantially Complete, or Ongoing/Institutionalized) to communicate progress through the corrective action lifecycle. The Current Status & Actions column provides a narrative description of actions to date, which may include completed steps, activities underway, planned milestones, or explanations of alternate approaches. Because corrective actions may be implemented in phases, entries may reflect interim or evolving conditions rather than final outcomes.

For tracking and reporting purposes, a corrective action may be considered substantially complete when its core elements have been implemented, operationalized, and supported by documentation such that they function as part of standard operations rather than as temporary or pilot efforts. Substantial completion does not require that all long-term monitoring, evaluation, or continuous improvement activities have concluded.

Substantial completion is evaluated using the following criteria:

1. Implementation – The corrective action is implemented and in active use.
2. Durability – The corrective action is embedded in standard operations and not dependent solely on interim measures or individual assignments.
3. Evidence – Documentation exists to substantiate implementation and support transparency, accountability, and future review.

### 6.4 How to Read the Corrective Action Matrix

The Corrective Action Matrix is intended to be read as a point-in-time snapshot of CAP implementation. Entries reflect conditions as of the date of each update and may describe interim steps, phased implementation, or ongoing institutional functions. Completion of individual actions or milestones within the matrix does not necessarily indicate closure of an entire corrective action unless explicitly identified as such. Readers are encouraged to consider the matrix in conjunction with the broader narrative sections of this CAP to understand sequencing, context, and longer-term improvement efforts.

### 6.5 Corrective Action Matrix Organization and Recommendation Inventory

Corrective actions are organized by functional area to support clear reference, oversight, and reporting. The matrix includes the following tables, which together reflect the full scope of recommendations derived from the independent audit.

- **Table A – Community Development Administration** – Leadership structure and governance; use of interim or consulting support; organizational alignment of Code Enforcement functions; evaluation of Building and Code Enforcement leadership classifications; development of performance metrics and dashboards; advisory oversight of CAP implementation; and establishment of formal escalation protocols for elevated permitting and inspection matters requiring management review.
- **Table B – Permit Counter Process Improvements** – Training enhancements for permit staff; dedicated permit intake staffing; classroom and embedded training support; revision of permit procedures and public informational materials; evaluation of professional certification requirements; and establishment of comprehensive applicant verification and supervisory authorization controls for business entities, owner-builders, and non-contractor applicants in compliance with applicable state law.
- **Table C – Building Inspection Process Reforms** – Training enhancements for inspection staff; classroom and field-based inspection training; use of Field Training Officers and subject-matter experts; off-site professional development; certification requirements; implementation of a quality assurance function for inspection oversight; uniform inspection checklists and photo documentation; and inspection performance accountability and final inspection integrity controls.
- **Table D – Public Support & Complaint Resolution** – Establishment of an ombudsman function; improved transparency regarding complaint pathways and available resources; and publication of guidance to assist homeowners in understanding appropriate resolution pathways for building-related concerns.
- **Table E – Future Supplemental Recommendations** – Reserved for additional corrective actions identified through expanded statistical analysis, performance metrics, quality assurance reviews,

and stakeholder feedback. Items added to Table E will be incorporated into Tables A–D as appropriate through future updates to the CAP.

This inventory is provided for orientation purposes and does not reflect implementation status, sequencing, or completion.

### 6.6 Corrective Action Matrix

The Corrective Action Matrix translates the above recommendations into discrete, trackable action items. For each entry, the matrix documents:

- the audit-based or internally derived recommendation,
- the applicable Implementation Phase, and
- the Town's Current Status & Actions, which may include actions taken, actions underway, planned milestones, or explanations of alternate approaches.

The matrix is intentionally designed to be dynamic. Entries will be updated periodically to reflect evolving conditions, implementation milestones, policy changes, training completion, organizational adjustments, performance measures, or other relevant outcomes. Where a recommendation is modified, deferred, or addressed through an alternative strategy, the rationale will be documented.

**Table A: Community Development Administration**

| ID# | Recommendation | Implementation Phase | Current Status & Actions |
|---|---|---|---|
| **A-1** | Hire a dedicated Community Development Director. | Ongoing | The Town of Paradise has retained the services of temporary consultant staff while assigning the restructured Assistant Town Manager to prepare and oversee the implementation of the CAP. Supplemental staff and administrative oversight will continue as long as necessary to achieve meaningful programmatic improvements identified in this CAP and future updates to the CAP. |
| **A-2** | Consider the use of an interim CD Director via a consulting firm. | Complete | The services of Ron Beehler of BPR Consulting Group were retained to function as an interim Community Development Director. This assignment has been carried forward through the appointment of the Assistant Town Manager to prepare and oversee the CAP. In the short term, Mr. Beehler will continue to perform advisory services to summarize experiences and inform/measure corrective actions. Additional technical assistance will be secured and available through the implementation of the CAP. |
| **A-3** | Consider moving Code Enforcement under the Planning Division. | Complete | Considered and declined. The current staffing model and functional scope of Code Enforcement are better aligned with Building and Fire Prevention than the Planning Division. |
| **A-4** | Consider reclassifying the Director of Building & Code Enforcement to Building Official / Fire Marshal. | Complete | Considered and declined. Current staffing model and oversight by the Community Development Director remain sufficient. With additional oversight by the Assistant Town Manager and implementation actions through the CAP, no adjustments to this position are necessary. |
| **A-5** | Develop a performance dashboard for permits, inspections, and complaints. | Ongoing | The performance dashboard development is underway. The dashboard will augment weekly rebuild updates to include monthly comprehensive performance metrics. Updates will include total customer interactions and inspection data. Target roll-out date of February 28, 2026. |
| **A-6** | Establish formal escalation protocols for elevated Building Division matters requiring management review. | Ongoing | The Town will adopt procedures requiring that elevated matters be referred to the Assistant Town Manager for review and direction. Examples include requests for expedited processing, disputes regarding fees, permits, or inspection determinations, and potential deviations from standard procedures. |

| | | | |
|---|---|---|---|
| **A-7** | Establish advisory committee for CAP progress monitoring (Council-authorized). | Ongoing | Town will launch Ad Hoc Advisory Committee which would support transparency and organized stakeholder engagement by reviewing CAP implementation progress, discussing procedural clarity, and considering themes identified through the Corrective Action Matrix, performance metrics, and stakeholder feedback. |

**Table B: Permit Counter Process Improvements**

| *ID#* | *Recommendation* | *Implementation Phase* | *Current Status & Actions* |
|---|---|---|---|
| **B-1** | Provide in-person training for permit staff on ethics, best practices, and legal requirements. | Ongoing | Effective December 1, 2025 the services of Jessie Oswald of Bureau Veritas were engaged to provide in-person oversight of all aspects of the building permitting process. Services are scheduled to continue through the end of January 2026. Additional efforts will be evaluated on an ongoing basis through implementation of the CAP. |
| **B-2** | Assign two dedicated permit technicians for permit intake and issuance. | Complete | Effective December 1, 2025 two dedicated Permit Technicians were assigned to handle permit intake and issuance. This approach improves efficiency, ensures consistency in application processing, reduces turnaround times, and allows other staff to focus on plan review, inspections, and customer support functions. |
| **B-3** | Provide classroom training for permit technicians and supervisors. | Ongoing | The services of Steve Burger of Bureau Veritas have been retained to provide two full days of onsite classroom training covering all aspects of the building permitting process. These trainings are scheduled for February 10-11, 2026.<br><br>Staff will also seek opportunities to further their ongoing professional development continuously and noted in future updates to the CAP. |
| **B-4** | Provide two weeks of embedded trainer support at the permit counter. | Ongoing | Effective December 1, 2025, the services of Jessie Oswald of Bureau Veritas were retained to provide in-person oversight of all aspects of the building permitting process.<br><br>Embedded support has been provided and will continue to be available through the implementation of the CAP. |
| **B-5** | Revise the permit procedures manual. | Ongoing | Starting December 1, 2025, the services of Jessie Oswald of Bureau Veritas were engaged to revise and update procedural guidelines. Target milestone date of February 28, 2026. |
| **B-6** | Require ICC Permit Technician Certification for classification. | Ongoing | Any changes to the minimum qualification requirements for employees in the Permit Technician classification trigger meet-and-confer obligations between the Town and Union representatives. Human Resources & Risk Management Director will be coordinating this process and more information will be included in future updates to the CAP. |

| | | | |
|---|---|---|---|
| **B-7** | Provide updated public informational materials. | Ongoing | Starting December 1, 2025, the services of Jessie Oswald of Bureau Veritas were engaged to revise and update all public informational materials. Target milestone date of February 28, 2026. |
| **B-8** | Establish comprehensive permit applicant verification and supervisory authorization controls for business entities, contractor, and owner-builder applicants. | Ongoing | The Town will implement standardized verification procedures for permit applications submitted by business entities, owner-builders, and non-contractor applicants. These procedures will require documentation of legal authority and compliance with Business and Professions Code section 7044 and Labor Code Section 2750, including workers' compensation declarations. These controls will be incorporated into permit procedures, training materials, and quality assurance reviews. |
| **B-9** | Establish a quality assurance function for permit intake oversight. | Ongoing | Starting February 2026, the Town will establish a quality assurance function for permit intake oversight to promote consistency, accuracy, and compliance with adopted procedures. This function will include periodic sampling of permit intake decisions, review of required documentation, and supervisory oversight of standardized checklists. Findings will inform training and continuous improvement efforts. |

**Table C: Building Inspection Process Reforms**

| *ID#* | *Recommendation* | *Implementation Phase* | *Current Status & Actions* |
|---|---|---|---|
| **C-1** | Provide in-person, in lieu of existing online-only, ethics training for inspectors. | Ongoing | Town staff has finalized in-person training scheduled for March 11, 2026. Training is planned for all available staff at Town Hall and Building Resiliency Center. |
| **C-2** | Provide classroom training for inspection of residential buildings, plan reading, and calculation interpretation. | Ongoing | Building Inspection staff will attend the 2026 Sacramento Valley Building Officials Education Week and the California Association of Building Officials Education Week.<br><br>Staff will also seek opportunities to further their ongoing professional development continuously and noted in future updates to the CAP. |
| **C-3** | Employ a Field Training Officer (FTO) for at least six months. | Ongoing | Starting October 27, 2025, the services of Mike Genna of BPR Consulting were retained as a Field Training Officer. The Town plans to rotate in new FTOs starting February 1, 2026 to ensure staff receives the benefit of multiple perspectives in this effort. |
| **C-4** | Provide off-site professional training for inspectors. | Ongoing | Building Inspection staff have attended a four-hour webinar on the 2025 Significant Changes to the California Residential Code. The California Energy Commission presented significant changes to the 2025 Building Code at January 2026 Building Stakeholders meeting.<br><br>Staff will also be attending the monthly Shasta Cascade Chapter of the International Code Council meetings, which include an educational component. In addition, staff will attend the Sacramento Valley Building Officials Education Week and the California Association of Building Officials Education Week to further support ongoing professional development.<br><br>Staff will also seek opportunities to further their ongoing professional development continuously and noted in future updates to the CAP. |
| **C-5** | Require Building Inspector II to obtain a second certification within 90 days of return. | Completed | Second ICC certification obtained on January 13, 2026 (ahead of 90 day recommendation). |

| | | | |
|---|---|---|---|
| **C-6** | Establish a quality assurance function for inspection oversight. | Ongoing | Starting February 1, 2026, Bureau Veritas will be engaged to provide a quality assurance function for inspection oversight. This effort is being developed to promote consistency, accuracy, and accountability across inspections. This function will include standardized inspection checklists, supervisory review, mentoring, and periodic audits to ensure inspections are conducted in accordance with adopted codes and best practices. Target milestone date of April 30, 2026. |
| **C-7** | Implement uniform inspection checklists and photo documentation. | Ongoing | Photographic inspection procedures have been implemented, and uniform inspection checklists are currently under development with Bureau Veritas. |
| **C-8** | Implement inspection performance accountability and final inspection controls. | Ongoing | The Town will establish formal inspection performance review protocols supported by the Quality Assurance function. Reviews will include periodic sampling of inspection records, field audits, and standardized checklists and photo documentation. Final inspection procedures will be revised to require documented verification that all prior correction notices have been resolved prior to approval. Supervisory review will be required for final approvals involving exceptions or unresolved items. |

**Table D: Public Support & Complaint Resolution**

| *ID#* | *Recommendation* | *Implementation Phase* | *Current Status & Actions* |
|---|---|---|---|
| **D-1** | Establish an ombudsman role to support homeowners navigating construction concerns. | Ongoing | The ombudsman recommendation will be performed by the Assistant Town Manager, through which information relating to concerns will be received and researched. Property owners may rely on this role to receive information from the Town regarding their concern and potential next steps. Notably, this ombudsman role is intended to facilitate information-sharing and navigation, not adjudication or enforcement. Matters that may fall within the scope of potential remedy or formal action will be referred to the Town Manager, Town Council and Town Attorney, as appropriate. Additional support for the ombudsman function may be required as the Town collects input from the community. |
| **D-2** | Improve transparency regarding complaint pathways and available resources. | Ongoing | In coordination with the ombudsman function described in D-1, the Town will publish clear, publicly accessible information describing how building-related concerns may be raised, reviewed, and routed. This information will outline the respective roles of Town staff, contractors, and external regulatory entities, as well as the types of issues that fall within municipal oversight versus those more appropriately addressed through contractor warranties, licensing authorities, or other consumer protection mechanisms.<br><br>Transparency materials will be posted to the Town's a dedicated page on the Town's website and updated periodically to reflect procedural changes, available resources, and lessons learned through implementation of the CAP. The goal of this effort is to ensure that property owners understand both how to engage with the Town and what pathways are available for resolution, while maintaining clarity regarding municipal authority and limitations.<br><br>Additional support for the ombudsman function may be required as the Town collects input from the community. |

**Table E: Future Supplemental Recommendations**

| *ID#* | *Recommendation* | *Implementation Phase* | *Current Status & Actions* |
|---|---|---|---|
| **E-#** | TBD | TBD | TBD |

## 7. Proposed CAP Timeline

The following timeline provides a high-level sequencing framework for implementation of the corrective actions identified in this Corrective Action Plan. It is intended to communicate the Town's anticipated approach to prioritization, coordination, and phased execution rather than to establish rigid deadlines for individual actions.

The timeline reflects the reality that corrective actions vary in complexity, resource requirements, and dependency on external factors such as recruitment, training availability, contractual services, and policy adoption. Accordingly, the phases identified below represent logical groupings of work designed to stabilize operations, strengthen institutional capacity, and integrate long-term improvements in a deliberate and sustainable manner.

As corrective actions progress, timelines may be refined to reflect actual implementation conditions, evolving priorities, or additional findings from expanded analysis. Any such adjustments will be documented in subsequent CAP updates to maintain transparency and accountability.

The Proposed CAP Timeline should be read in conjunction with the Corrective Action Matrix and the public reporting commitments described in Section 8, which together provide a comprehensive picture of how corrective actions will be implemented, monitored, and communicated.

| Phase | Period | Primary Activities |
|---|---|---|
| Phase 1: Stabilization | November 2025 to February 2026 | Staff reinstatement; FTO engagement, continued supplemental staffing, initiation of training; organizational restructuring decisions; Corrective Action Plan adoption and initiation. |
| Phase 2: Infrastructure Build-Out | December 2025 to March 2026 | Development of revised procedures; permit and inspection procedure rollouts; adoption of new manuals; implementation of certification requirements; expanded statistical analysis of inspections, themes and programmatic needs. Initial advisory review of CAP implementation progress by Council-authorized Ad Hoc Committee. |
| Phase 3: Public Interface Improvements | February 2026 to September 2026 | Ombudsman role implemented through the Assistant Town Manager; expanded public guidance; transparency reporting. |
| Phase 4: Quality Assurance Integration | April 2026 to February 2027 | Long-term QA/oversight; system improvements; metrics reporting; close-out of corrective items. |

## 8. Public Reporting, Transparency, and Advisory Oversight

The Town recognizes that transparency, clear reporting, and structured oversight are essential to maintaining public confidence during implementation of the Corrective Action Plan (CAP). In addition to internal management controls and reporting to the Town Council, the Town will use public reporting and advisory oversight mechanisms to provide visibility into CAP progress while preserving appropriate governance roles and operational authority.

### 8.1 Public Reporting Commitments

The Town will provide periodic public reporting on CAP implementation through Town Council agenda materials, published reports, and other appropriate public-facing communications. These updates will reflect information contained in the Corrective Action Matrix and associated performance measures as of the date of each update.

Public reporting will summarize, at a minimum:

- Changes in Implementation Phase for corrective actions,
- Notable actions completed or initiated since the prior update,
- Corrective actions that remain ongoing or require sustained implementation,
- Key performance indicators or metrics used to evaluate progress, where available, and
- Material adjustments to corrective actions or implementation approaches.

CAP updates will emphasize that reported information represents a point-in-time snapshot and that implementation progress may evolve as conditions change, additional data becomes available, or refinements are identified. Completion of individual actions or milestones does not necessarily indicate closure of an entire corrective action unless explicitly stated.

### 8.2 Adapted Ad Hoc Advisory Committee

In August 2025, the Town Council recommended the formation of a time-limited Ad Hoc Committee to provide input on improvement opportunities related to Building Division operations. With development of this Corrective Action Plan, the Town is now recommending that the Committee's purpose be adapted to provide structured advisory input focused specifically on CAP implementation.

As adapted, the Ad Hoc Advisory Committee would support transparency and organized stakeholder engagement by reviewing CAP implementation progress, discussing procedural clarity, and considering themes identified through the Corrective Action Matrix, performance metrics, and stakeholder feedback.

The Ad Hoc Advisory Committee would serve in an advisory capacity only. Responsibility for implementation of corrective actions and preparation of CAP updates will remain with Town staff, with oversight and direction provided by the Town Council through established reporting processes. Advisory input does not confer management authority, operational control, or decision-making responsibility.

The Ad Hoc Advisory Committee would be time-limited and focused on CAP implementation during the corrective action period. The Committee's role would conclude once its advisory purpose related to CAP oversight has been fulfilled, as determined by the Town Council.

# 2025 Building Division Audit Corrective Action Plan Quarterly Update

RESTORING COMMUNITY CONFIDENCE THROUGH IMPLEMENTATION

FOR TOWN COUNCIL REVIEW JUNE 9, 2026

**Prepared by:**

Marc Mattox
Assistant Town Manager

## Table of Contents

1. Background and Context ..... 2

2. Major Milestones & Accomplishments ..... 3

2.1 CAP Implementation Structure & Independent Review ..... 3

2.2 Building Code Complaint Ordinance ..... 3

2.3 Building Code Complaint & CAP Community Intake Form ..... 4

3. Corrective Action Framework and Implementation Matrix Updates ..... 6

4. CAP Timeline Update ..... 22

### Appendix

Town of Paradise Ordinance 655 - Building Code Complaints

Building Code Complaint & CAP Community Intake Form

## 1. Background and Context

In August 2025, in response to ongoing community concerns about permitting consistency, inspection reliability, and accountability during the post–Camp Fire rebuilding period, the Town of Paradise commissioned an independent operational audit of the Building Division. The audit was conducted to evaluate permitting and inspection practices and identify opportunities for process improvement.

The audit found no illegal wrongdoing. It did identify areas warranting correction, including permit intake procedures, inspector training, internal oversight, and documentation practices. The Town accepted the findings and committed to addressing them in a structured, transparent, and public-facing way.

The 2025 Building Division Audit Corrective Action Plan was prepared by Assistant Town Manager Marc Mattox and adopted by the Town Council on February 10, 2026. The CAP translates audit findings — along with additional improvement opportunities identified through internal review — into specific, trackable corrective actions organized across five functional areas.

The CAP was designed with the understanding that some corrective actions could be initiated immediately, while others would require additional time, contractual arrangements, staff training, or coordination with labor representatives. A phased implementation timeline was included in the original document, ranging from Phase 1 (Stabilization, November 2025–February 2026) through Phase 4 (Quality Assurance Integration, April 2026–February 2027).

It is important for readers of this update to understand the environment in which these corrective actions are being implemented. Since the Camp Fire in 2018, the Town of Paradise has managed one of the largest residential rebuilding efforts in California history. Since rebuilding began in earnest in early 2020, the Building Division has processed more than 3,890 single-family residential permit applications and issued more than 3,190 Certificates of Occupancy, in addition to more than 1,000 multi-family unit applications and 755 Certificates of Occupancy. This volume is without precedent in the Town's history.

The 2025 audit was not a comprehensive evaluation of all Building Division activity. It reviewed a defined set of escalated concerns and was intended to identify process gaps and near-term improvements. The Town has committed to supplementing the audit with broader data-driven analysis — including a manual review of a sample of 148 permits — to establish statistically meaningful performance metrics, evaluate trends across permitting and inspection categories, and provide a more complete picture of operational performance over time. That expanded review is currently underway; findings will be incorporated into future CAP updates and Table E as they become available.

This document is the first quarterly update to the adopted CAP. It covers the period from adoption through May 30, 2026. It does not replace the original CAP — it updates it. Each quarterly update will follow this same structure, reporting new activity in each Matrix ID alongside the original commitments, so that progress is visible and cumulative over time.

A full copy of the adopted CAP is available at https://www.townofparadise.com/building/page/building-code-complaint-corrective-action-plan.

## 2. Major Milestones & Accomplishments

### 2.1 CAP Implementation Structure & Independent Review

Related CAP Matrix IDs: A-7, C-6, C-7 and C-8

A defining milestone of this reporting period is the Town's engagement of Interwest to provide an independent quality assurance and advisory review function supporting CAP implementation. This engagement reflects the Town's commitment to ensuring that corrective actions are not only implemented but independently assessed for effectiveness — an added layer of accountability that goes beyond internal reporting.

Interwest supports the Assistant Town Manager's oversight function, operating independently from the Building Division's day-to-day operational chain of command. This structural separation is intentional: where embedded operational staff work to improve practices from within, Interwest provides an objective, arms-length evaluation of whether those improvements are taking hold and whether CAP commitments are being met in practice.

Interwest also serves as the Town's formal Independent Reviewer under Ordinance No. 655 (PMC §15.02.065), the newly adopted Building Code Complaint Ordinance. In this capacity, Interwest is responsible for the objective review of post-construction Building Code complaints, including evidence gathering, site inspections where warranted, and the issuance of Notices of Complaint and Notices of Determination. This dual role — supporting both CAP implementation oversight and the formal complaint review process — positions Interwest as a central accountability mechanism across the Town's broader corrective action framework. Notably, the engagement of an independent third-party reviewer in this capacity was not contemplated in the original CAP; it represents a governance enhancement that strengthens the accountability structure beyond what the adopted document required.

### 2.2 Building Code Complaint Ordinance

Related CAP Matrix IDs: A-7, D-1 and D-2

The Town has advanced one of its most significant policy milestones with passage of a new Building Code Complaint Ordinance (Ordinance 655), Section 15.02.065 of the Paradise Municipal Code. This ordinance establishes a formal, structured system for processing, reviewing, and managing complaints alleging violations of the Building Code — a mechanism that has not previously existed within the Town's regulatory framework.

The ordinance establishes the following core framework:

- **Independent Reviewer.** A third-party consultant retained by the Town to conduct objective reviews of complaints, gather evidence, conduct inspections, and issue written Notices of Complaint (NOC) and Notices of Determination (NOD) regarding Building Code compliance.
- **CAP Community Intake Form as Exclusive Entry Point.** All complaints must be submitted through the Town's CAP Community Intake Form. Complaints submitted outside of this process will not be accepted, ensuring consistent documentation and tracking.

- **Due Process Protections.** Permit Applicants (PAs) receive notice and have 10 business days to respond with documentation. PAs and property owners both have the right to representation at any inspection.
- **Appeal Rights.** PAs who disagree with a Notice of Determination (NOD) may appeal in writing to the Town Council within 10 calendar days, with a right to present evidence at a public hearing.
- **Strike System.** Following an upheld NOD (or failure to appeal), the PA receives a Strike tied to the Assessor's Parcel Number. A PA with two or more active Strikes faces denial of all new permit applications and suspension of existing issued permits until all violations are remediated.
- **10-Year Lookback.** The ordinance applies to permits issued under this title and for a period of 10 years thereafter, establishing meaningful accountability coverage for post-fire rebuilding construction.

The CAP Ad Hoc Advisory Committee is formally incorporated into the ordinance as an advisory and oversight body for the Building Code complaint process. The Committee does not make technical code compliance determinations but supports and facilitates the Independent Review process while monitoring the overall intent of the ordinance.

This ordinance represents a landmark policy achievement for the Town, translating the CAP's commitment to accountability into enforceable, codified procedures. Its passage will provide property owners with a clear, accessible pathway for raising Building Code concerns while establishing a structured, impartial review process that protects all parties.

### 2.3 Building Code Complaint & CAP Community Intake Form

Related CAP Matrix IDs: D-1 and D-2

On May 26, 2026, the Town launched the updated Building Code Complaint & CAP Community Intake Form, marking a significant milestone in the Town's public engagement and complaint resolution framework. The form serves as the exclusive entry point for community members to submit either general concerns related to Building Division operations or formal Building Code complaints under the newly adopted Ordinance No. 655.

The form is structured to accommodate two distinct submission pathways, recognizing that not all community concerns rise to the level of a formal code complaint:

- **General Concern or Feedback** — for input related to permit processing, plan review, inspection outcomes, code interpretation, communication, owner-builder oversight, CAP implementation, or general Building Division operations. These submissions are reviewed for trends, systemic issues, and programmatic evaluation.
- **Formal Building Code Complaint** — for property owners alleging a potential violation of the California Building Standards Code (Title 24) discovered after construction. Eligible complaints are screened for completeness and referred to Interwest, as the Town's Independent Reviewer, for formal evaluation, potential site inspection, and issuance of a determination in accordance with PMC §15.02.065.

The form collects information necessary to triage and route submissions appropriately, including property address and permit number, construction status, permit applicant type, contractor license information,

and whether the submitter has attempted to resolve the issue directly with the builder. Submitters are also asked whether they are willing to participate in follow-up actions, including a potential Independent Reviewer inspection.

The Consent to Proceed section clearly communicates the scope and limitations of the process — that submissions are reviewed for eligibility, that non-code issues such as aesthetic or general workmanship concerns may not qualify for formal review, and that confirmed violations may result in administrative action including issuance of a Strike against the Permit Applicant under the Municipal Code. Final acknowledgements confirm the submitter's understanding that the form does not replace formal appeals, legal claims, or actions with the CSLB or other agencies.

Submissions received through May 30, 2026 are being tracked and will be reported in the next quarterly update. The next report will provide a full accounting of submissions received, triage outcomes, and any early trends identified through the intake process — including the distribution between general concern submissions and formal Building Code complaints, and whether any complaints have been referred to Interwest for Independent Review.

## 3. Corrective Action Framework and Implementation Matrix Updates

The Corrective Action Matrix is the primary accountability tool for this CAP. It translates audit findings and internally identified improvements into discrete, trackable actions organized across five functional tables (Table E remains reserved for supplemental recommendations to be identified through expanded analysis and quality assurance reviews):

- **Table A** — Community Development Administration
- **Table B** — Permit Counter Process Improvements
- **Table C** — Building Inspection Process Reforms
- **Table D** — Public Support & Complaint Resolution
- **Table E** — Future Supplemental Recommendations (reserved for actions identified through expanded analysis, quality assurance review, and stakeholder feedback)

Each matrix entry documents the original recommendation, the implementation phase, and a current status narrative. The matrix is a point-in-time snapshot — entries reflect conditions as of the date of this update and may describe completed steps, ongoing activities, or planned milestones. Completion of individual milestones does not indicate closure of an entire corrective action unless explicitly stated.

A corrective action may be considered substantially complete when it has been implemented, embedded in standard operations, and supported by documentation — not solely dependent on interim measures or individual assignments. Items designated as complete will also be independently reviewed by Interwest in the next reporting period.

A full copy of the adopted CAP, including the complete Corrective Action Framework, is available at https://www.townofparadise.com/building/page/building-code-complaint-corrective-action-plan.

**Table A: Community Development Administration**

| ID# | Recommendation | Phase | Current Status & Actions |
|---|---|---|---|
| **A-1** | Hire a dedicated Community Development Director. | Complete 12/2025 | Following adoption of the CAP, the Town strengthened its administrative oversight structure by restructuring the Assistant Town Manager role to include direct responsibility for CAP implementation, ombudsman functions, and public accountability reporting.<br><br>The Town maintains two Community Development Directors: Planning/Wastewater, and Building, Code Enforcement, and Fire Prevention — providing focused leadership across the full scope of community development operations.<br><br>In addition, the Town engaged Interwest Consulting Group to provide independent quality assurance sampling, technical advisory support, and quarterly validation of CAP implementation progress, further strengthening the oversight structure with an Independent Reviewer separate from Building Division staff and Town management. |
| **A-2** | Consider the use of an interim Community Development Director via a consulting firm. | Complete 12/2025 | The interim Community Development Director consulting arrangement with BPR Consulting Group has concluded. The oversight functions originally contemplated under this action have been incorporated into the restructured Assistant Town Manager role described in A-1 and are further supported by the independent quality assurance engagement with Interwest Consulting Group. |
| **A-3** | Consider moving Code Enforcement under the Planning Division. | Complete | No changes. Code Enforcement remains aligned with Building and Fire Prevention under the Community Development Director. This organizational structure continues to be appropriate and no adjustments are warranted. |
| **A-4** | Consider reclassifying the Community Development Director – Building/Code Enforcement/Fire Prevention to Building Official / Fire Marshal. | Complete | No changes. The current staffing model and oversight structure remain appropriate. |

| | | | |
|---|---|---|---|
| **A-5** | Develop a performance dashboard for permits, inspections, and complaints. | Complete | Staff has implemented monthly public reporting as the primary vehicle for the performance dashboard called for under A-5. CDD Monthly Activity Summary reports for January through April 2026 are published and publicly accessible on the Town's website at townofparadise.com/building/page/2026-reports.<br><br>Each report documents comprehensive performance metrics across all six CDD divisions, including total customer interactions, call and email volumes, inspection counts and pass rates, permits applied and issued, and defensible space inspection activity — consistent with the dashboard content scope identified in the CAP.<br><br>During the February through April 2026 period, reported metrics reflect positive operational trends: building inspection volume grew from 979 to 1,331 per month, pass rates improved from 68% to 73%, and code enforcement closed more cases than it opened in April. Monthly reporting is now established as a standard operational practice and will continue throughout the CAP implementation period. |
| **A-6** | Establish formal escalation protocols for elevated Building Division matters requiring management review. | Complete | Formal escalation protocols have been established for elevated Building Division matters requiring management review before any determination outside normal code administration is communicated to an applicant or party. The protocols do not create additional appeal rights or diminish the statutory authority of the Building Official.<br><br>Five categories of circumstances trigger mandatory escalation: expedited processing requests; fee disputes or waiver requests; permit and inspection determination disputes; requests for deviations from standard procedures; and matters involving legal threats or suspected improper influence. For permit and inspection disputes, the CDD Director provides a first level of review; unresolved matters escalate to the Assistant Town Manager, who may refer technical determinations to the Town's Independent Reviewer in an advisory capacity.<br><br>Formal appeals of Building Official decisions remain governed by the Building/Fire Code Board of Appeals under PMC Title 15. |

| | | | |
|---|---|---|---|
| **A-7** | Establish advisory committee for CAP progress monitoring (Council-authorized). | Ongoing | The CAP Ad Hoc Advisory Committee has been established and seated. The Committee is composed of the following members:<br>• Steve Crowder, Mayor<br>• Heidi Lange, Councilmember<br>• Jennifer Macarthy, Town Manager<br>• Marc Mattox, Assistant Town Manager<br>• Tony Lindsey, Community Development Director<br>• Bill Hayes, Interwest<br>• Dave Anderson, Contractor<br>• James Frost, Contractor<br>• Jarrod Holliday, Engineer<br>• Donna Vairo, Community Member<br><br>The Committee's membership reflects a cross-section of municipal leadership, technical professionals, and community representation, consistent with the CAP's intent to support transparency and organized stakeholder engagement during the corrective action period.<br><br>The Committee's charge has been expanded to include oversight of the building code complaint process recently adopted by the Town Council through a new ordinance adding Section 15.02.065 to the Paradise Municipal Code. Under that ordinance, the Committee serves as an advisory and oversight body for the complaint review process — supporting and facilitating Independent Reviews and monitoring overall implementation — while the substantive determinations of Building Code compliance remain with an independent third-party reviewer. The Committee does not serve in a decision-making or adjudicatory capacity.<br><br>The Committee will continue to review CAP implementation progress, engage with performance metrics and stakeholder feedback, and provide structured advisory input throughout the corrective action period. Updates on Committee activity will be reflected in subsequent CAP reports. |

**Table B: Permit Counter Process Improvements**

| ID# | Recommendation | Phase | Current Status & Actions |
|---|---|---|---|
| **B-1** | Provide in-person training for permit staff on ethics, best practices, and legal requirements. | Complete March 2026 | In-person ethics and professional conduct training was completed during this reporting period. On March 11 and 12, 2026, the Town hosted two days of on-site training delivered by Gerry Preciado of 34th Street Training, covering two required subject areas:<br><br>Workplaces That Work for All of Us — Harassment Prevention, satisfying the requirements of AB1825 (supervisory), SB1343 (non-supervisory), and AB1661 (local agency officials); and Preserving the Public Trust: Ethics for Public Entity Officials, satisfying the requirements of AB1234.<br><br>Sessions were held at both the Building Resiliency Center and Town Hall Council Chambers to accommodate all available staff. Training was conducted in an interactive, in-person format rather than the online format typically used for state-mandated training, consistent with the audit's recommendation for more engaging and effective delivery. Sign-in sheets and training materials are on file. |
| **B-2** | Assign two dedicated permit technicians for permit intake and issuance. | Complete December 2025 | This corrective action was implemented effective December 1, 2025, and the dedicated permit technician staffing model has remained in place. Two permit technicians continue to be assigned exclusively to permit intake and issuance, supporting consistency in application processing, reducing turnaround times, and allowing other building division staff to focus on plan review, inspections, and customer support functions. |
| **B-3** | Provide classroom training for permit technicians and supervisors. | Ongoing | Two full days of onsite classroom training were completed February 10–11, 2026, delivered by Steve Burger, CBO, of Bureau Veritas. The Complete Permit Technician curriculum covered code history, overview and use, legal aspects of code administration, and the permitting process.<br><br>Staff will continue to seek and document ongoing professional development opportunities throughout the CAP implementation period, with additional training recommendations informed by both Interwest and Bureau Veritas QA sampling findings as they become available. |

| | | | |
|---|---|---|---|
| **B-4** | Provide two weeks of embedded trainer support at the permit counter. | Complete | The embedded trainer support has been implemented and sustained well beyond the initial two-week threshold. Jessie Oswald with Bureau Veritas, maintained an ongoing embedded presence with the Town between December 2025 to April 2026, providing direct in-person oversight and support across building division operations, including the permit counter. |
| **B-5** | Revise the permit procedures manual. | Complete February 2026 | Effective December 1, 2025, the services of Jessie Oswald of Bureau Veritas were engaged to revise and update the Town of Paradise permit procedures manual, with a target completion date of January 31, 2026. This initiative was undertaken to ensure that all procedural documentation is current, accurate, and aligned with best practices.<br><br>The revised Permit Technician Manual has been completed and reflects current operations across all key functional areas of the Building Division. The manual includes step-by-step guidance on GovWell record types and workflows, building permit submittal requirements for residential, manufactured home, and commercial projects, plan review routing procedures, fee calculation and invoicing processes for plan review, issuance, and development impact fees, wastewater application review and clearance-to-record procedures, and signature verification and contractor license requirements for permit issuance.<br><br>The manual serves as a comprehensive operational reference for permit technicians and supports consistency, accountability, and quality in permit counter operations going forward. |
| **B-6** | Require ICC Permit Technician Certification for classification. | Ongoing | Any changes to the minimum qualification requirements for employees in the Permit Technician classification trigger meet-and-confer obligations between the Town and Union representatives. Human Resources & Risk Management Director has initiated coordination of this process. Meet-and-confer scheduling is underway and more information will be included in future updates to the CAP. |
| **B-7** | Provide updated public informational materials. | Ongoing May 2026 | A comprehensive suite of over 25 public-facing documents has been developed, updated, and published this quarter, spanning five areas: community guidance and CAP intake, contractor and owner-builder resources, buyer and pre-construction guidance, |

| | | | |
|---|---|---|---|
| | | | plan and site checklists, and code compliance references. Key deliverables include the Community Resource Guide identifying external resolution pathways for concerns outside Town authority, the CAP Community Intake Form serving as the exclusive initial point of contact for building code complaints under the newly adopted ordinance, and updated checklists covering SFR and commercial rebuild, WUI, solar, and CalGreen requirements.<br><br>These documents may be found at the Building Resiliency Center and at the Town's website at https://www.townofparadise.com/building.<br><br>These materials are in active use and will be updated on an ongoing basis as procedures and code requirements evolve through the CAP implementation period. |
| **B-8** | Establish comprehensive permit applicant verification and supervisory authorization controls for business entities, contractor, and owner-builder applicants. | Ongoing | Standardized permit applicant verification controls have been integrated into building division operations during this quarter through two primary mechanisms.<br><br>First, contractor information verification has been embedded as a standard first-line requirement across all 2026 inspection checklists developed under B-5. Every inspection type — from underground plumbing and electrical through framing, insulation, drywall, roofing, and final — requires documented confirmation of contractor information before the inspection proceeds. This systematically anchors verification to each stage of the permit lifecycle rather than solely at intake.<br><br>Second, staff received targeted professional development directly relevant to owner-builder and contractor authorization requirements. The April 2, 2026 Shasta Cascade Chapter ICC monthly meeting featured a presentation by Hal Clay, Special Investigator with the California Contractors State License Board, covering owner-builder provisions and B contractors working out of class — two of the specific compliance areas identified in the original audit findings.<br><br>Additionally, the updated public-facing materials completed under B-7 — including the Owner-Builders Pamphlet, What is an Owner-Builder, Before Hiring a Contractor, Checklist for |

| | | | |
|---|---|---|---|
| | | | Prescreening Contractors, CSLB Ten Tips, and ADV Contractor guide — support applicant-side awareness of legal requirements consistent with Business and Professions Code section 7044 and Labor Code section 2750. Incorporation of verification requirements into formal permit procedures and quality assurance reviews is ongoing and will be documented in subsequent CAP updates. |
| **B-9** | Establish a quality assurance function for permit intake oversight. | Ongoing | The foundational elements for a permit intake quality assurance function have been put in place during this quarter. Standardized intake procedures and verification checklists developed under B-5 and B-8 provide the procedural framework upon which a formal QA function will be built. The 2026 Building Inspection Quality Assurance Checklist, developed in collaboration with Bureau Veritas, establishes a structured model for periodic sampling, documentation review, and supervisory oversight that is directly applicable to the permit intake context.<br><br>Active implementation of the permit intake QA function — including periodic sampling of intake decisions, review of required documentation, and findings-based training and improvement — is anticipated to advance in the next reporting period through the engagement of Interwest Consulting Group. Interwest's role will include providing structured oversight and QA support at the permit counter as part of the Town's ongoing CAP implementation infrastructure. Progress on this item will be reported in the subsequent CAP update. |

**Table C: Building Inspection Process Reforms**

| ID# | Recommendation | Phase | Current Status & Actions |
|---|---|---|---|
| **C-1** | Provide in-person, in lieu of existing online-only, ethics training for inspectors. | Complete March 2026 | In-person ethics and professional conduct training was completed during this reporting period. On March 11 and 12, 2026, the Town hosted two days of on-site training delivered by Gerry Preciado of 34th Street Training, covering two required subject areas:<br><br>Workplaces That Work for All of Us — Harassment Prevention, satisfying the requirements of AB1825 (supervisory), SB1343 (non-supervisory), and AB1661 (local agency officials); and Preserving the Public Trust: Ethics for Public Entity Officials, satisfying the requirements of AB1234.<br><br>Sessions were held at both the Building Resiliency Center and Town Hall Council Chambers to accommodate all available staff. Training was conducted in an interactive, in-person format rather than the online format typically used for state-mandated training, consistent with the audit's recommendation for more engaging and effective delivery. Sign-in sheets and training materials are on file. |
| **C-2** | Provide classroom training for inspection of residential buildings, plan reading, and calculation interpretation. | Ongoing | Classroom training for inspection staff is underway through two tracks.<br><br>Building Division staff attended the 2026 SVABO Training Institute, completing the following courses: 2025 California Building Code Chapter 11B; 2025 California Energy Code Requirements for Single-Family, Multi-Family and Nonresidential Buildings; Basic Steps in Structural Plan Review; Significant Changes to the 2025 California Mechanical and Plumbing Code; Generators and Transformers; and 2024 ICC Residential Plumbing and Mechanical — Inspection and Plan Review.<br><br>In addition, Bureau Veritas has scheduled a half-day onsite classroom training on reading and interpreting truss calculations for single-family residential and similar project types, to be delivered by Bureau Veritas Senior Inspector David Gavranich and Plans Examiner Frank Glazewski on June 11, 2026. Building inspectors and plan review staff will attend. |

| | | | |
|---|---|---|---|
| | | | Staff will continue to seek and document ongoing professional development opportunities throughout the CAP implementation period, with additional training recommendations informed by both Interwest and Bureau Veritas QA sampling findings as they become available. |
| **C-3** | Employ a Field Training Officer (FTO) for at least six months. | Complete April 2026 | The FTO program has been continuously active throughout this quarter, implemented in three progressive phases designed to broaden inspector exposure across multiple professional perspectives. Phase 1 (October 2025 – January 2026) provided initial embedded field oversight through BPR Consulting. Phase 2 (February – March 2026) transitioned to a Bureau Veritas FTO team conducting weekly ride-alongs with all three building inspectors, covering foundation, framing, MEP rough-in, roofing, solar, and building finals. Phase 3 (April 2026) expanded to off-site ride-alongs at active inspection sites in Rocklin, exposing inspectors to commercial, multi-story, and high-complexity inspection types not routinely encountered in Paradise's rebuild environment.<br><br>Notable training outcomes include documented improvement in plan referencing, inspector confidence, and code-specific knowledge across WUI requirements, CSST gas piping, T-24 energy compliance, and truss calculations. |
| **C-4** | Provide off-site professional training for inspectors. | Ongoing | Off-site professional training has been active throughout this reporting period through two primary channels.<br><br>Building inspection staff have attended the Shasta Cascade Chapter of the International Code Council (SCCICC) monthly meetings continuously from November 2025 through April 2026 — six consecutive meetings. Building Plans Examiner Patti Samons serves as Chapter President. Meeting topics during this period included special inspections, foundation clearance from slopes, wood truss calculations, aging-in-place requirements, WUI code applicability under the 2025 code cycle, and a presentation by a CSLB Special Investigator on owner-builder provisions and contractors working out of class. Staff also participate in the SCCICC Inspector Exchange Group, which provides additional code consistency and peer collaboration opportunities between regional building departments. |

| | | | |
|---|---|---|---|
| | | | A hands-on Fire Sprinklers Workshop hosted in Paradise is planned for June 17, 2026, featuring in-field fire sprinkler inspections, a fire flow demonstration, and fire sprinkler calculations and plan review instruction.<br><br>Staff will continue to seek and document ongoing professional development opportunities throughout the CAP implementation period, with additional training recommendations informed by both Interwest and Bureau Veritas QA sampling findings as they become available. |
| **C-5** | Require Building Inspector II to obtain a second certification within 90 days of return. | Completed January 2026 | Second ICC certification obtained for the position. |
| **C-6** | Establish a quality assurance function for inspection oversight. | Ongoing | The quality assurance function for inspection oversight was initiated effective February 1, 2026 through the engagement of Bureau Veritas. During this quarter, the foundational elements of the QA function have been developed and placed into active use. The 2026 Building Inspector Quality Assurance Checklist has been completed and adopted, providing a structured, seven-section framework covering permit and plan verification, code compliance verification, inspection execution, documentation and photo verification, consistency and QA review, customer communication, and safety and professional conduct. The checklist includes a formal QA sign-off section requiring supervisor review and verification prior to advancement to the next inspection stage.<br><br>This checklist has been integrated into the FTO program's daily field engagement throughout the quarter, with the Bureau Veritas team reinforcing its use in real-time during ride-along inspections. The ongoing weekly FTO reports serve as a contemporaneous record of supervisory oversight and mentoring activity consistent with the QA function's intended scope. |
| **C-7** | Implement uniform inspection checklists and photo documentation. | Completed January 2026 | As reported at the time of CAP adoption, photographic inspection procedures had already been implemented and uniform inspection checklists were under development in collaboration |

| | | | |
|---|---|---|---|
| | | | with Bureau Veritas. Both elements are now complete and in active operational use.<br><br>The 2026 Residential Stick-Built Building Inspection Checklists, 2026 Manufactured Residential Building Inspection Checklists, and all over-the-counter inspection checklists for electrical, plumbing, mechanical, solar, pools, and fire systems have been finalized and adopted. Each checklist includes a photo documentation requirement specific to the inspection type, with required photos called out at the checklist level — for example, test gauge readings, trench routing, rebar and anchor details, and key structural elements — ensuring photographic evidence is captured systematically rather than at inspector discretion.<br><br>Photo documentation requirements are also formally embedded in the 2026 Building Inspector Quality Assurance Checklist under Section 4 — Documentation and Photo Verification, which requires inspection results to be entered into GovWell and clear, labeled photos taken of the overall work area, key inspected components, and any deficiencies. Notes must be complete, professional, and objective, with corrections referencing applicable code sections.<br><br>The FTO program has reinforced photo documentation practices throughout the quarter through real-time field coaching, and these requirements are now functioning as standard operational practice across the inspection team. |
| **C-8** | Implement inspection performance accountability and final inspection controls. | Ongoing | Formal inspection performance accountability protocols and final inspection controls have been developed and are launching June 1, 2026. Bureau Veritas will provide periodic formal inspection performance review protocols supported by the quality assurance function established under C-6, including monthly representative sampling of completed inspection records, field audits, standardized checklists with photo documentation, and final inspection procedures requiring documented verification that all prior correction notices have been resolved before approval is granted. Supervisory review is required for final approvals involving exceptions or unresolved items. |

| | |
|---|---|
| | These controls build directly on the procedural infrastructure established during this reporting period — including the standardized inspection checklists developed under C-7, the Building Inspector Quality Assurance Checklist developed under C-6, and the FTO field coaching program under C-3 — creating a layered accountability framework that addresses the audit's findings regarding inspection consistency and final inspection integrity. The targeted completion date for full implementation is December 28, 2026. |

**Table D: Public Support & Complaint Resolution**

| ID# | Recommendation | Phase | Current Status & Actions |
|---|---|---|---|
| **D-1** | Establish an ombudsman role to support homeowners navigating construction concerns. | Ongoing | The ombudsman function is active and operational through the Assistant Town Manager's office. The CAP Complaint Ordinance has been formally adopted and launched, providing a structured pathway for community members to submit building-related concerns for review and tracking.<br><br>Homeowners and community members are encouraged to engage directly with the Assistant Town Manager, who is available for walk-in ombudsman office hours every Wednesday and Thursday from 11:00 a.m. to 1:00 p.m. at Town Hall, 5555 Skyway, Paradise, CA 95969. Appointments outside of office hours are also available Monday through Thursday during normal business hours and may be scheduled by emailing mmattox@townofparadise.com.<br><br>The ombudsman role is designed to help homeowners understand their concern, identify the appropriate resolution pathway, and navigate available resources — whether those resources are within Town authority or through external agencies such as CSLB, civil court, or state licensing boards. This function is informational and navigational in nature; it does not adjudicate disputes, reopen inspections, or assign liability. |
| **D-2** | Improve transparency regarding complaint pathways and available resources. | Ongoing | Transparency materials and complaint pathways have been substantially developed and published during this reporting period. The Town Council adopted Ordinance No. 655 on May 12, 2026, codified as Paradise Municipal Code § 15.02.065, establishing a formal Building Code complaint process for property owners. This ordinance created meaningful consequences for contractors who fail to meet Building Code requirements, including a two-strike suspension mechanism under which contractors with two or more unresolved valid complaints will have new permit applications denied and existing issued permits suspended until violations are corrected.<br><br>A combined Building Code Complaint and CAP Feedback Form is now publicly available and serves as both the formal complaint submission mechanism under § 15.02.065 (Path A) and the general |

stakeholder feedback channel for CAP monitoring (Path B). The form is accessible at townofparadise.com/building.

The Community Resource Guide for Building Concerns Outside Town Authority has been published with six attachments covering contractor disputes and CSLB processes, civil and small claims court options, the Right-to-Repair law (SB 800) including a notice template, other licensed professionals and state oversight agencies, consumer fraud and deceptive practices, and modular and manufactured housing under HCD oversight.

All materials — including the independent audit, the adopted CAP, the complaint ordinance, the intake form, and the Community Resource Guide — are accessible on the Town's dedicated CAP webpage at https://www.townofparadise.com/building/page/building-code-complaint-corrective-action-plan.

**Table E: Future Supplemental Recommendations**

| ID# | Recommendation | Implementation Phase | Current Status & Actions |
|---|---|---|---|
| **E-#** | TBD | TBD | TBD |

## 4. CAP Timeline Update

The following timeline provides a high-level sequencing framework for implementation of the corrective actions identified in this Corrective Action Plan. It is intended to communicate the Town's anticipated approach to prioritization, coordination, and phased execution rather than to establish rigid deadlines for individual actions.

The timeline reflects the reality that corrective actions vary in complexity, resource requirements, and dependency on external factors such as recruitment, training availability, contractual services, and policy adoption. Accordingly, the phases identified below represent logical groupings of work designed to stabilize operations, strengthen institutional capacity, and integrate long-term improvements in a deliberate and sustainable manner.

As corrective actions progress, timelines may be refined to reflect actual implementation conditions, evolving priorities, or additional findings from expanded analysis. Any such adjustments will be documented in subsequent CAP updates to maintain transparency and accountability.

As of this reporting period, Phase 1 is fully complete and Phase 2, 3 and 4 are actively underway.

| Phase | Period | Primary Activities |
|---|---|---|
| Phase 1: Stabilization | November 2025 to February 2026 | Staff reinstatement (completed); FTO engagement (completed), continued supplemental staffing (ongoing), initiation of training (completed); organizational restructuring decisions (completed); Corrective Action Plan adoption and initiation (completed). |
| Phase 2: Infrastructure Build-Out | December 2025 to August 2026 (updated from March 2026) | Development of revised procedures (ongoing); permit and inspection procedure rollouts (ongoing); adoption of new manuals (ongoing); implementation of certification requirements (ongoing); expanded statistical analysis of inspections (ongoing), themes and programmatic needs (ongoing). Initial advisory review of CAP implementation progress by Council-authorized Ad Hoc Committee (completed). |
| Phase 3: Public Interface Improvements | February 2026 to February 2027 (updated from September 2026) | Ombudsman role implemented through the Assistant Town Manager (ongoing); expanded public guidance (ongoing); transparency reporting (ongoing). |
| Phase 4: Quality Assurance Integration | April 2026 to February 2027 | Long-term QA/oversight (ongoing); system improvements; metrics reporting; close-out of corrective items (ongoing). |

**TOWN OF PARADISE**
**ORDINANCE NO. 655**

**AN ORDINANCE OF THE TOWN OF PARADISE ADOPTING NEW SECTION 15.02.065 AND MAKING FINDINGS OF FACTS RELATING TO BUILDING CODE COMPLAINTS AND ESTABLISHING OVERSIGHT BY THE BUILDING DIVISION CORRECTIVE ACTION PLAN AD HOC ADVISORY COMMITTEE**

The Town Council of the Town of Paradise, State of California does hereby **ORDAIN AS FOLLOWS:**

**SECTION 1.** Findings. The Town Council finds and declares as follows:

a) Under Article XI, Section 7 of the California Constitution local agencies may make and enforce all local, police, sanitary and other ordinances within their jurisdiction, provided they do not conflict with general state laws; and

b) The Town Council of Paradise hereby finds that the public health, safety, and welfare of the Town of Paradise will be best protected and served by ensuring that all buildings, structures, electrical, gas, mechanical, and plumbing systems comply with the Paradise Municipal Code which adopted and incorporated several sections of the California Building Standards Code (California Code of Regulations, Title 24); and

c) The Town Council of the Town of Paradise desires to set forth certain procedures to ensure the enforcement of the Building Code by creating a system to process, review and manage complaints alleging violations of the Building Code.

**SECTION 2.** Section 15.02.065 is added to the Paradise Municipal Code as follows:

**15.02.065 Building Code Complaint Procedure; Review and Determination by the Independent Reviewer.**

A. Definitions

1. Building Code – The Paradise Municipal Code applicable to buildings and construction, including but not limited to Title 15 of the Paradise Municipal Code.

2. Permit Applicant (PA) – the individual or entity that applied for and was issued a permit for the construction of the building, structure, electrical, gas, mechanical, or plumbing system. In the event the Permit Applicant is an entity, the principals and signatory on the permit application shall be deemed to be Permit Applicants, as well as the entity.

3. Building Division Corrective Action Plan (CAP) Ad Hoc Advisory Committee – The CAP Ad Hoc Advisory Committee shall serve as an advisory and oversight body for the Building Code complaint process, consistent with the Town's Building Division Corrective Action Plan. The Committee shall not serve as the primary decision-making body for technical determinations of Building Code compliance, however, will support and facilitate Independent Reviews while monitoring the overall intent of this ordinance.

4. Independent Reviewer – The Independent Reviewer shall be a third-party consultant retained by the Town responsible for the objective review of complaints, evidence,

inspections, and issuance of Notices of Determination regarding Building Code compliance. The Independent Reviewer shall not have had a primary role in supporting or facilitating the course of construction of the subject complaint.

5. Strike – a Strike is a finding against a Permit Applicant (PA) that a Building Code complaint has been deemed founded following the issuance of a Notice of Determination and an appeal by a Permit Applicant, or a failure to timely file an appeal, as outlined in this section. Only one Strike may be in effect for each Assessor's Parcel Number. A Strike shall be removed or inactivated only by remediation of the Building Code violations, which shall be confirmed in writing by the Building Official as outlined in this Section.

B. Every building permit granted under this title or any section hereof is granted and accepted by all parties with the express understanding that the building, structure, electrical, gas, mechanical, or plumbing system must meet the requirements of the Building Code. Following issuance of the building permit, and for a period of 10 years thereafter, if a property owner suspects the PA did not adhere to the Building Code, a complaint shall be submitted through the Town's CAP Community Intake Form as the exclusive initial point of contact. Complaints submitted outside of the CAP Intake process shall not be accepted.. The complaint must include: the location of the building, structure, electrical, gas, mechanical, or plumbing system, the nature of the alleged violation, and efforts the property owner has undertaken to obtain relief from the PA prior to submitting the complaint. Town staff shall conduct an initial completeness and eligibility screening and refer qualifying complaints to the Independent Reviewer.

All complaints, reviews, and determinations shall be documented and tracked in accordance with the Town's Building Division Corrective Action Plan (CAP).

C. The Independent Reviewer shall review all complaints submitted through the CAP Intake Form and determine whether the complaint references a potential violation of the Building Code. Complaints that reference aesthetic issues or issues that do not relate to the requirements of the Building Code will not be considered. If the complaint alleges an issue that may violate the Building Code, the Independent Reviewer shall issue a Notice of Complaint (NOC) that will be sent to the PA. The NOC must include the specific location of the building, structure, electrical, gas, mechanical, or plumbing system that is the subject of the complaint and the section of the Building Code, that has allegedly been violated. Within 10 business days of issuance of the NOC, the PA may respond with an explanation of how the requirements of the Building Code were met or with documentation refuting the allegations in the NOC.

D. After receiving the PA's response to the NOC, the Independent Reviewer may contact the owner of the building, structure, electrical, gas, mechanical, or plumbing system to schedule an inspection. In the event an inspection is requested, the property owner and the PA shall have the right to have one representative present at the inspection.

E. Within 10 business days following the gathering of evidence as outlined in Paragraphs C and D of this Section, the Independent Reviewer shall review the evidence and issue a written Notice of Determination (NOD), which shall be sent by the Town Clerk to the property owner and PA by regular mail. If the Independent Reviewer determines that the complaint has been unfounded, the complaint will be dismissed. If the Independent Reviewer confirms the existence of a Building Code violation, the NOD must include the specific location of the building, structure, electrical, gas, mechanical, or plumbing system that is the subject of the NOD and the section of the Building Code pertaining to the violation.

F. In the event that a PA disagrees with the NOD, the PA may appeal the determination by submitting a written appeal to the Town Council within 10 calendar days. The appeal shall be submitted to the Town Clerk. The appeal shall include evidence refuting the violation stated in the NOD and demonstrating that the requirements of the Building Code have been met. The Town Council shall review the appeal and all documents reviewed by the Independent Reviewer at a regular or special meeting, at which the property owner and the PA may appear and provide a statement to the Town Council. The statement by the property owner and PA shall not exceed 10 minutes each, unless additional time is needed to address questions by the Town Council.

G. The Town Council may, but is not required to, overturn the NOD issued by the Independent Reviewer by majority vote of the Council Members in attendance at the meeting. In the event that the NOD is overturned, the complaint shall be dismissed as unfounded.

H. Following an appeal by the PA and a failure to overturn the NOD, or in the event that a PA fails to timely file an appeal of an NOD, the PA shall receive a Strike. The Strike shall be active until the PA remediates the Building Code violation to the satisfaction of the Building Official, as defined in Section 2.12.054.

I. If a PA has two or more Strikes in effect that have not been removed or inactivated, all new permit applications for any buildings, structures, electrical, gas, mechanical, or plumbing systems shall be denied and all existing permits in the issued status to the PA will be suspended until all of the active Strikes on the PA's record have been removed.

J. It shall be unlawful for any person, firm, or corporation to erect, construct, enlarge, alter, repair, move, improve, remove, convert, demolish, occupy or maintain any real property, building, structure, or building service equipment or cause or permit the same while the permit is suspended.

**SECTION 4.** Severability. If any provision of this ordinance or the application thereof to any person or circumstances is for any reason held to be invalid by a court or competent jurisdiction, such provision shall be deemed severable, and the invalidity thereof shall not affect the remaining provisions or other applications of the ordinance, which can be given effect without the invalid provision or application thereof.

**SECTION 5.** CEQA Exemption. Adoption of this Ordinance is exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to California Public Resources Code Section 21080(b)(3) regarding projects to maintain, repair, restore, or replace property or facilities damaged or destroyed as a result of a declared disaster and Section 21080(b)(4) regarding actions to mitigate or prevent an emergency, and CEQA Guidelines Section 15269(a) regarding maintaining, repairing, restoring, demolishing, or replacing property or facilities damaged or destroyed as a result of a disaster stricken area in which a state of emergency has been proclaimed by the Governor pursuant to the California Emergency Services Act, commencing with Section 8550 of the California Government Code.

**SECTION 6.** Publication. This ordinance shall take effect thirty (30) days after the date of its passage. Before the expiration of fifteen (15) days after its passage, this ordinance or a summary thereof shall be published in a newspaper of general circulation published and circulated within the Town of Paradise along with the names of the members of the Town Council of Paradise voting for and against same.

**PASSED AND ADOPTED** BY THE Town Council of the Town of Paradise, County of Butte, State of California, on this 12th day of May, 2026, by the following vote:

**AYES:** Greg Bolin, Steve "Woody" Culleton, Heidi Lange, Ronald Lassonde and Steve Crowder, Mayor

**NOES:** None

**ABSENT:** None

**ABSTAIN:** None

Steve Crowder, Mayor

ATTEST: May 13, 2026

Melanie Elvis, Town Clerk

APPROVED AS TO FORM:

Scott E. Huber, Town Attorney

# Building Code Complaint & CAP Community Intake Form

## 1. Consent to Proceed

This form allows you to submit either general concerns or a formal Building Code complaint to the Town of Paradise. By proceeding, you acknowledge:

1. This form may be used for general input or formal Building Code complaints; only submissions that meet eligibility requirements will be processed as formal complaints.
2. All submissions are reviewed for completeness and relevance to potential Building Code violations; non-code issues (such as aesthetic or general workmanship concerns) may not be accepted for formal review.
3. Eligible complaints may be referred for independent review, and confirmed violations may result in administrative action, including potential issuance of a Strike against the Permit Applicant as defined by the Town of Paradise Municipal Code.
4. Submission does not guarantee review, findings, or enforcement, and some submissions may result in no further action or referral to other resources.
5. Certain concerns may be more appropriately addressed through contractors, the California Contractors State License Board (CSLB), or other avenues, and this form does not initiate action with those entities.
6. Information may be used for complaint review, CAP implementation, and program-level analysis.

### * 1. Consent to Proceed

◯ I have read and understand the above notice and wish to proceed.

# Building Code Complaint & CAP Community Intake Form

## 2. Submitter Information

* 1. Full Name

2. Organization / Company (if applicable)

* 3. Role

- ◯ Property Owner
- ◯ Builder / Contractor
- ◯ Architect / Engineer / Design Professional
- ◯ Developer
- ◯ Real Estate Professional
- ◯ Resident / Community Member
- ◯ Other

4. Relationship to the subject property

- ◯ Property Owner
- ◯ Tenant
- ◯ Contractor / Builder
- ◯ Architect / Engineer / Design Professional
- ◯ Other (please specify)

5. If you are not the property owner, do you have authorization to submit this concern on their behalf?

- ◯ Yes
- ◯ No
- ◯ Not applicable

* 6. Email Address

**Email address**

* 7. Phone Number

**Country code**

**Phone number** +1

**Ext.**

* 8. Project Street Address (Providing a complete street address helps the Town accurately review your submission):

9. Permit Number(s), if known (Providing a permit number helps the Town accurately review your submission):

10. What is the status of the home construction, if applicable:

- ◯ Completed / Certificate of Occupancy issued
- ◯ Under construction
- ◯ Permit issued but work not started
- ◯ Unknown

11. Who was responsible for building your home, if applicable (Permit Applicant):

- ◯ Licensed General Contractor
- ◯ Owner-Builder (BPC §7044 declaration)
- ◯ Manufactured / Modular / Factory-Built (HCD regulated)
- ◯ Unknown / Not Sure

12. Builder / Contractor Company Name (if known)

13. If a contractor or builder was involved, what is the Contractor/Builder CSLB License Number, if known (optional):

14. Have you attempted to contact the contractor or builder (Permit Applicant) to resolve this issue?

- ◯ Yes – Issue resolved
- ◯ Yes – Not resolved
- ◯ Yes - No response received
- ◯ No
- ◯ Not applicable

15. Are you willing to participate in follow-up actions, if needed (e.g., clarification, coordination, or potential Independent Reviewer inspection)?

- ◯ Yes
- ◯ No

## Building Code Complaint & CAP Community Intake Form

### 3. Nature of Submission & Details

* 1. What best describes your submission?

- ◯ General concern or feedback relating to the Town of Paradise
- ◯ Formal Building Code Complaint relating to the construction of my home

## Building Code Complaint & CAP Community Intake Form

### 4. Formal Building Code Complaint

* 1. Does your concern involve a potential violation of the Building Code (California Building Standards Code / Title 24? Complaints related only to aesthetics, workmanship, or contractual disputes may not qualify for formal review.

- ◯ Yes
- ◯ No
- ◯ Unsure

* 2. What type of code issue are you reporting?

- ◯ Structural / framing
- ◯ Electrical
- ◯ Plumbing
- ◯ Mechanical
- ◯ Exterior (roof, siding, deck, etc.)
- ◯ Foundation
- ◯ Other (please specify)

* 3. Where specifically is the issue located?

* 4. Describe the issue and why you believe it may not comply with California Building Code:

* 5. When was this issue observed?

- ◯ During construction
- ◯ At final inspection
- ◯ After occupancy
- ◯ Unsure

* 6. Do you have documentation to support this concern?

- ◯ Yes (photos, reports, etc)
- ◯ No

7. Have you already attempted to resolve this issue with the builder?

- ◯ Yes
- ◯ No
- ◯ Not applicable

## Building Code Complaint & CAP Community Intake Form

### 5. Details of Your General Concern, Feedback, or Request for Review (Non-Complaint Submission)

* 1. Topic(s) Related to Your Concern or Feedback (select all that apply)

- [ ] Permit processing timelines or delays
- [ ] Plan review comments, revisions, or requirements
- [ ] Permit approval, denial, or conditions of approval
- [ ] Inspection scheduling, results, or inspection outcomes
- [ ] Code interpretation or application consistency
- [ ] Communication, responsiveness, or customer service
- [ ] Owner-Builder permit processes or oversight
- [ ] Professional conduct or interactions with staff
- [ ] Process clarity, role boundaries, or decision-making transparency
- [ ] Quality or safety concerns related to permitted work (for general feedback only; formal code complaints should use the complaint pathway)
- [ ] Fees, invoicing, or billing matters
- [ ] Corrective Action Plan (CAP) implementation or monitoring
- [ ] General Building Division operations or procedures

Other (please specify)

* 2. Description of Concern, Observation, or Feedback (Please provide as much detail as possible (e.g., location, timing, or specific issue).

* 3. In your opinion, does this represent a broader or recurring issue?

- ◯ Yes
- ◯ No
- ◯ Unsure

4. In your view, this concern primarily involves:

- ◯ Town permitting or inspection process
- ◯ Contractor / builder workmanship or warranty performance
- ◯ Both
- ◯ Unsure

5. When did this issue occur?

- ◯ Recently (within last 30 days)
- ◯ Within the past year
- ◯ More than a year ago
- ◯ Ongoing / recurring

6. What outcome or resolution would you like to see, if any?

* 7. Would you be open to follow-up (e.g., clarification, coordination, or a meeting if needed)?

- ◯ Yes
- ◯ No

# 2025 Building Division Audit Corrective Action Plan Quarterly Update

*RESTORING COMMUNITY CONFIDENCE THROUGH IMPLEMENTATION*

REVIEWED BY TOWN COUNCIL ON SEPTEMBER 8, 2026

**Prepared by:**

Marc Mattox
Assistant Town Manager

## Table of Contents

1. Background and Context ..... 2
2. Major Milestones & Accomplishments ..... 3
    2.1 Grand Jury Report & Town Council Response ..... 3
    2.2 Building Code Complaint Update & Independent Reviewer ..... 3
    2.3 Community Development Performance Dashboard ..... 6
3. Corrective Action Framework and Implementation Matrix Updates ..... 8
4. CAP Timeline Update ..... 23

## 1. Background and Context

In August 2025, in response to ongoing community concerns about permitting consistency, inspection reliability, and accountability during the post–Camp Fire rebuilding period, the Town of Paradise commissioned an independent operational audit of the Building Division. The audit was conducted to evaluate permitting and inspection practices and identify opportunities for process improvement.

The audit found no illegal wrongdoing. It did identify areas warranting correction, including permit intake procedures, inspector training, internal oversight, and documentation practices. The Town accepted the findings and committed to addressing them in a structured, transparent, and public-facing way.

The 2025 Building Division Audit Corrective Action Plan was prepared by Assistant Town Manager Marc Mattox and adopted by the Town Council on February 10, 2026. The CAP translates audit findings — along with additional improvement opportunities identified through internal review — into specific, trackable corrective actions organized across five functional areas.

The CAP was designed with the understanding that some corrective actions could be initiated immediately, while others would require additional time, contractual arrangements, staff training, or coordination with labor representatives. A phased implementation timeline was included in the original document, ranging from Phase 1 (Stabilization, November 2025–February 2026) through Phase 4 (Quality Assurance Integration, April 2026–February 2027).

It is important for readers of this update to understand the environment in which these corrective actions are being implemented. Since the Camp Fire in 2018, the Town of Paradise has managed one of the largest residential rebuilding efforts in California history. Since rebuilding began in earnest in early 2020, the Building Division has processed more than 3,890 single-family residential permit applications and issued more than 3,190 Certificates of Occupancy, in addition to more than 1,000 multi-family unit applications and 755 Certificates of Occupancy. This volume is without precedent in the Town's history.

The 2025 audit was not a comprehensive evaluation of all Building Division activity. It reviewed a defined set of escalated concerns and was intended to identify process gaps and near-term improvements. The Town has committed to supplementing the audit with broader data-driven analysis — including a manual review of a sample of 148 permits — to establish statistically meaningful performance metrics, evaluate trends across permitting and inspection categories, and provide a more complete picture of operational performance over time. That expanded review is currently underway; findings will be incorporated into future CAP updates and Table E as they become available.

This document is the second quarterly update to the adopted CAP. It covers the period from June 1 through August 31, 2026. It does not replace the original CAP — it updates it. Each quarterly update will follow this same structure, reporting new activity in each Matrix ID alongside the original commitments, so that progress is visible and cumulative over time.

A full copy of the adopted CAP is available at https://www.townofparadise.com/building/page/building-code-complaint-corrective-action-plan.

## 2. Major Milestones & Accomplishments

### 2.1 Grand Jury Report & Town Council Response

*Related CAP Matrix IDs: Multiple*

In June 2026, the Butte County Civil Grand Jury released its 2025–2026 Final Report, which included two reports concerning the Town's Community Development Department Building Division. Collectively, the reports contained 11 findings and 11 recommendations addressing employee qualifications and training, inspection and permit-processing practices, communication, organizational oversight, public access to the Building Division audit, and verification of permit applicants.

On July 29, 2026, the Town Council approved its formal response to the Grand Jury. The Council agreed with or agreed in part with several findings regarding past inspection and permit-intake deficiencies, while disagreeing with findings that were unsupported, inconsistent with Town records, or did not accurately reflect the Town's organizational structure and staff qualifications. The Council's response also noted that many of the Grand Jury's recommendations had already been implemented through the Building Division Audit and Corrective Action Plan, including:

- Structured employee training, certification tracking and professional development;
- Updated inspection protocols, checklists and quality-assurance measures;
- Discontinuation of "courtesy inspections";
- Standardized permit-intake procedures and checklists;
- Verification of applicant authority, contractor licensing and workers' compensation coverage; and
- Public quarterly reporting on CAP implementation.

The Council declined recommendations to release confidential attorney work product associated with the independent investigation and to reconsider previously rejected CAP organizational changes. The Council determined that the publicly released Audit Memo identifies the operational findings and recommendations resulting from the investigation and that the organizational structure adopted with the CAP appropriately supports its implementation.

The 2025–2026 Butte County Civil Grand Jury Final Report and the Town Council's July 29, 2026 formal response are available for public review through the Town's Building Code Complaint and Corrective Action Plan webpage.

Staff reviewed the Grand Jury findings, recommendations and Council responses in relation to the existing CAP. Because the applicable recommendations are already addressed through adopted CAP actions, have otherwise been implemented, or were expressly declined by the Town Council, staff does not recommend adding any Table E actions in response to the Grand Jury reports or the Town Council's response.

### 2.2 Building Code Complaint Update & Independent Reviewer

Ordinance No. 655, codified as Paradise Municipal Code § 15.02.065, became effective June 11, 2026. The ordinance establishes a formal process for property owners to submit complaints alleging that a permit applicant failed to comply with applicable Building Code requirements. Eligible complaints are referred to an Independent Reviewer for records review, site inspection and written determination.

As of August 31, 2026, the Town had received 22 complaints. Of these, three were withdrawn, one was determined to be unrelated to the ordinance, one could not proceed because it was submitted anonymously and 17 were determined to be actionable. Of the actionable complaints, 14 have received an initial site visit from the Independent Reviewer and 3 remain in the initial review process. Initial implementation has demonstrated that the ordinance provides a structured and independent process for evaluating eligible complaints, notifying permit applicants and encouraging corrective action. It has also identified opportunities to clarify the ordinance's scope, prioritize appropriate cases for independent review and encourage resolution before initiating the Town's formal process.

### Feedback Regarding the Scope of the Process

During implementation, some participants have requested that the Town expand the complaint process to address two additional areas:

- Construction quality or craftsmanship concerns that may not constitute Building Code violations; and
- Direct accountability for subcontractors in circumstances where the permit applicant or prime contractor did not select, contract with or supervise the subcontractor.

Staff does not recommend expanding the ordinance into either area. The Town Council established the complaint process to determine compliance with applicable adopted building codes—not to adjudicate construction-quality, workmanship or contractual disputes.

Building codes establish minimum requirements intended to protect health and safety. Work may comply with those minimum requirements while still failing to meet an owner's expectations, contractual specifications or preferred standards of workmanship. Those concerns generally remain private matters between the property owner and the contractors involved.

Similarly, the Town's regulatory relationship is with the applicant identified on the building permit. The Town does not interpret private contracts or determine the contractual allocation of responsibility among property owners, prime contractors and subcontractors. When a permit applicant accepts responsibility for a permit, that party remains accountable to the Town for the permitted work regardless of separate private arrangements concerning who selected or contracted with individual subcontractors.

If a property owner separately retains a contractor to perform distinct work outside the prime contractor's permitted scope, a separate permit may be required. When that contractor obtains the permit, the contractor assumes responsibility to the Town as the permit applicant for that work.

### Limitations of the Independent Review

The complaint process is not a comprehensive evaluation or reinspection of the residence. The Independent Reviewer evaluates the specific Code allegations identified in an eligible complaint based on available permit records and visual, non-destructive observations.

The process does not:

- Reinspect the entire residence;
- Perform destructive testing or authorize removal of completed construction;

- Determine the underlying cause of a concealed condition without supporting evidence;
- Evaluate general construction quality or craftsmanship;
- Interpret or enforce private contracts, warranties or scopes of work; or
- Determine civil liability among owners, contractors and subcontractors.

A property owner seeking a broader evaluation, destructive investigation or assessment of workmanship may retain an appropriately licensed contractor, engineer, architect or other qualified professional. Any resulting evidence relating to a specific allegation of noncompliance with an applicable building code may be submitted for consideration through the complaint process, subject to the ordinance's eligibility and procedural requirements.

The Council's existing direction limiting the complaint process to Building Code compliance remains appropriate. Staff does not recommend expanding the ordinance to include workmanship, construction quality or private contractual disputes.

### Recommended Ordinance and Implementation Refinements

Based on experience to date, staff recommends developing amendments to the ordinance and seeking Town Council affirmation or alternative direction regarding the following implementation guardrails.

Implementation Guardrails

**Completed projects only.** Limit the ordinance to projects that have received final approval from the Town and a Certificate of Occupancy. Complaints involving active permits or projects still under construction would be referred to Building Division staff for review through the regular inspection and enforcement process. Unresolved matters would follow the established escalation protocols, including review by the Assistant Town Manager when appropriate.

**No involvement in private contractual agreements.** The complaint process would not interpret or enforce private contracts, warranties or scopes of work, or determine how responsibility is allocated among property owners, prime contractors and subcontractors. Those matters remain outside the Town's regulatory authority and must be resolved by the parties or through other available administrative, licensing or civil remedies.

**No review of quality or craftsmanship complaints.** Independent review would remain limited to specific allegations of noncompliance with applicable building codes. The process would not evaluate general construction quality, craftsmanship or whether completed work satisfies an owner's expectations, contractual specifications or preferred industry standards when those concerns do not constitute code violations.

**No Strikes for non-permit holders.** Notices of Complaint, Notices of Determination and Strikes would continue to be issued only to the permit applicant responsible to the Town for the permitted work. The Town would not assign Strikes to subcontractors or other parties who did not hold the applicable permit, regardless of private arrangements concerning who selected, contracted with or supervised the work. If a separately retained contractor obtained an individual permit for distinct work, that contractor would be treated as the permit applicant responsible for that permitted scope.

**Minimum documented communication.** Before initiating an Independent Reviewer site inspection, require the property owner to provide evidence that the permit applicant received written notice describing the alleged deficiencies and a reasonable opportunity to inspect and address them. This requirement would be generally modeled on the notice-and-opportunity-to-repair principles of California's Right to Repair Law (SB 800), without requiring the Town to administer or adjudicate that separate civil process.

Independent review could proceed when the permit applicant declines to address the concern, fails to respond within the established period or the parties remain unable to resolve the alleged code issue.

Ordinance Modifications

**Extraordinary life-safety circumstances.** Retain the existing two-strike framework while authorizing the Independent Reviewer to designate a substantiated allegation as an extraordinary circumstance when the violation is egregious and presents a serious and immediate threat to life or safety.

Staff recommends that the Town Attorney develop language amending the ordinance to address extraordinary circumstances, including the potential assignment of two Strikes upon issuance of a Notice of Determination, subject to appropriate notice and appeal procedures.

### Recommended Next Steps

These proposed refinements would:

- Distinguish active construction oversight from the post-completion complaint process;
- Encourage property owners and permit applicants to attempt resolution before Town intervention;
- Preserve the process's focus on objectively reviewable building code requirements;
- Affirm that private contracts, workmanship and civil liability remain outside the Town's review;
- Maintain accountability with the party responsible to the Town as the permit applicant;
- Clarify the limitations of visual, non-destructive independent review; and
- Provide a stronger enforcement option for rare but exceptionally serious life-safety violations.

Staff recommends that the Town Council affirm or provide alternative direction regarding the proposed implementation guardrails. Following that direction, staff would consult with the Town Attorney, Independent Reviewer and CAP Ad Hoc Advisory Committee before returning to the Council with any necessary ordinance amendments.

## 2.3 Community Development Performance Dashboard

The Town's monthly CDD Activity Summaries provide ongoing public reporting of permit, inspection and Code Enforcement performance. The following table summarizes the highest-level metrics included in the January through July 2026 reports, the latest monthly reports available at the time this quarterly update was prepared.

| Month | Building Inspections | Inspection Pass Rate | Plan Checks | Total Permits Issued | Median Issuance Time | Code Cases Opened | Code Cases Closed |
|---|---|---|---|---|---|---|---|
| January | 1,069 | 73% | 324 | 74 | 22 days | 34 | 36 |
| February | 979 | 68% | 134 | 88 | 15 days | 25 | 42 |
| March | 1,584 | 66% | 233 | 94 | 25 days | 48 | 45 |
| April | 1,331 | 73% | 216 | 102 | 25 days | 56 | 58 |
| May | 1,159 | 70% | 208 | 89 | 25 days | 37 | 53 |
| June | 1,183 | 76% | 210 | 91 | 35 days | 65 | 63 |
| July | 1,473 | 71% | 271 | 117 | 36 days | 43 | 57 |
| **YTD** | **8,778** | **≈71%** | **1,596** | **655** | **N/A** | **308** | **354** |

Through July, the Building Division completed 8,778 inspections, performed 1,596 plan checks and issued 655 permits. During the most recent three months, inspections increased from 1,159 in May to 1,473 in July, while plan checks increased from 208 to 271 and permits issued increased from 89 to 117. Inspection pass rates remained relatively stable, ranging from 70% to 76%.

Median permit-issuance time increased from 25 days in May to 36 days in July and will continue to be monitored as workload increases. Code Enforcement closed 173 cases while opening 145 during the same three-month period, resulting in a net reduction of 28 cases.

## 3. Corrective Action Framework and Implementation Matrix Updates

The Corrective Action Matrix is the primary accountability tool for this CAP. It translates audit findings and internally identified improvements into discrete, trackable actions organized across five functional tables (Table E remains reserved for supplemental recommendations to be identified through expanded analysis and quality assurance reviews):

- **Table A** — Community Development Administration
- **Table B** — Permit Counter Process Improvements
- **Table C** — Building Inspection Process Reforms
- **Table D** — Public Support & Complaint Resolution
- **Table E** — Future Supplemental Recommendations (reserved for actions identified through expanded analysis, quality assurance review, and stakeholder feedback)

Each matrix entry documents the original recommendation, the implementation phase, and a current status narrative. The matrix is a point-in-time snapshot — entries reflect conditions as of the date of this update and may describe completed steps, ongoing activities, or planned milestones. Completion of individual milestones does not indicate closure of an entire corrective action unless explicitly stated.

A corrective action may be considered substantially complete when it has been implemented, embedded in standard operations, and supported by documentation — not solely dependent on interim measures or individual assignments. Items designated as complete will also be independently reviewed by Interwest in the next reporting period.

A full copy of the adopted CAP, including the complete Corrective Action Framework, is available at https://www.townofparadise.com/building/page/building-code-complaint-corrective-action-plan.

**Table A: Community Development Administration**

| ID# | Recommendation | Phase | Current Status & Actions |
|---|---|---|---|
| **A-1** | Hire a dedicated Community Development Director. | Completed December 2025 | Prior to adoption of the CAP, the Town strengthened its administrative oversight structure by restructuring the Assistant Town Manager role to include direct responsibility for preparing and implementing the CAP, ombudsman functions, and public accountability reporting.<br><br>The Town maintains two Community Development Directors: Planning/Wastewater, and Building/Code Enforcement/Fire Prevention — providing focused leadership across the full scope of community development operations.<br><br>In addition, the Town engaged Interwest Consulting Group to provide independent quality assurance sampling, technical advisory support, and quarterly validation of CAP implementation progress, further strengthening the oversight structure with an Independent Reviewer separate from Building Division staff and Town management. |
| **A-2** | Consider the use of an interim Community Development Director via a consulting firm. | Completed December 2025 | The interim Community Development Director consulting arrangement with BPR Consulting Group has concluded. The oversight functions originally contemplated under this action have been incorporated into the restructured Assistant Town Manager role described in A-1 and are further supported by the independent quality assurance engagement with Interwest Consulting Group. |
| **A-3** | Consider moving Code Enforcement under the Planning Division. | Completed December 2025 | No change. Code Enforcement remains aligned with Building and Fire Prevention under the Community Development Director. In responding to the 2025–2026 Butte County Civil Grand Jury report, the Town Council considered the Grand Jury's recommendation to revisit this organizational structure and, by majority vote, declined to change its prior direction. The Council's decision is documented in the Town's formal response to the Grand Jury. |
| **A-4** | Consider reclassifying the Community Development Director – Building/Code Enforcement/Fire Prevention to Building Official / Fire Marshal. | Complete December 2025 | No change. In responding to the 2025–2026 Butte County Civil Grand Jury report, the Town Council considered the Grand Jury's recommendation to revisit this classification and, by majority vote, declined to change its prior direction. The Council's decision is documented in the Town's formal response to the Grand Jury. The current classification and oversight structure remain in place. |

| | | | |
|---|---|---|---|
| **A-5** | Develop a performance dashboard for permits, inspections, and complaints. | Complete | Staff has implemented monthly public reporting as the performance dashboard called for under A-5. CDD Monthly Activity Summary reports are published on the Town's website and provide consistent reporting across all six divisions, including customer contacts, inspections, permit activity, processing times, plan reviews, code enforcement and defensible space operations.<br><br>Monthly reporting is now established as a standard operational practice and will continue throughout the CAP implementation period. A summary of year-to-date performance metrics and recent operational trends is provided in Section 2.3 of this report. |
| **A-6** | Establish formal escalation protocols for elevated Building Division matters requiring management review. | Completed May 2026 | Formal escalation protocols have been established for elevated Building Division matters requiring management review before any determination outside normal code administration is communicated to an applicant or party. The protocols do not create additional appeal rights or diminish the statutory authority of the Building Official.<br><br>Five categories of circumstances trigger mandatory escalation: expedited processing requests; fee disputes or waiver requests; permit and inspection determination disputes; requests for deviations from standard procedures; and matters involving legal threats or suspected improper influence. For permit and inspection disputes, the CDD Director provides a first level of review; unresolved matters escalate to the Assistant Town Manager, who may refer technical determinations to the Town's Independent Reviewer in an advisory capacity.<br><br>Formal appeals of Building Official decisions remain governed by the Building/Fire Code Board of Appeals under PMC Title 15. |
| **A-7** | Establish advisory committee for CAP progress monitoring (Council-authorized). | Ongoing | The CAP Ad Hoc Advisory Committee has been established and seated. The Committee is composed of the following members:<br>• Steve Crowder, Mayor<br>• Heidi Lange, Councilmember<br>• Jennifer Macarthy, Town Manager<br>• Marc Mattox, Assistant Town Manager<br>• Tony Lindsey, Community Development Director<br>• Bill Hayes, Interwest<br>• Bill Carter, Interwest (added)<br>• Dave Anderson, Contractor<br>• James Frost, Contractor |

- Jarrod Holliday, Engineer
- Donna Vairo, Community Member

The Committee's membership reflects a cross-section of municipal leadership, technical professionals, and community representation, consistent with the CAP's intent to support transparency and organized stakeholder engagement during the corrective action period.

The Committee's charge has been expanded to include oversight of the building code complaint process recently adopted by the Town Council through a new ordinance adding Section 15.02.065 to the Paradise Municipal Code. Under that ordinance, the Committee serves as an advisory and oversight body for the complaint review process — supporting implementation of independent reviews and monitoring overall implementation — while the substantive determinations of Building Code compliance remain with an Independent Reviewer. The Committee does not serve in a decision-making or adjudicatory capacity.

The Committee will continue to review CAP implementation progress, engage with performance metrics and stakeholder feedback, and provide structured advisory input throughout the corrective action period. Updates on Committee activity will be reflected in subsequent CAP reports.

**Table B: Permit Counter Process Improvements**

| ID# | Recommendation | Phase | Current Status & Actions |
|---|---|---|---|
| **B-1** | Provide in-person training for permit staff on ethics, best practices, and legal requirements. | Completed March 2026 | In-person ethics and professional conduct training was completed in March 2026. On March 11 and 12, 2026, the Town hosted two days of on-site training delivered by Gerry Preciado of 34th Street Training, covering two required subject areas:<br><br>Workplaces That Work for All of Us — Harassment Prevention, satisfying the requirements of AB1825 (supervisory), SB1343 (non-supervisory), and AB1661 (local agency officials); and Preserving the Public Trust: Ethics for Public Entity Officials, satisfying the requirements of AB1234.<br><br>Sessions were held at both the Building Resiliency Center and Town Hall Council Chambers to accommodate all available staff. Training was conducted in an interactive, in-person format rather than the online format typically used for state-mandated training, consistent with the audit's recommendation for more engaging and effective delivery. Sign-in sheets and training materials are on file. |
| **B-2** | Assign two dedicated permit technicians for permit intake and issuance. | Completed December 2025 | This corrective action was implemented effective December 1, 2025, and the dedicated permit technician staffing model has remained in place. Two permit technicians continue to be assigned exclusively to permit intake and issuance, supporting consistency in application processing, reducing turnaround times, and allowing other building division staff to focus on plan review, inspections, and customer support functions. |
| **B-3** | Provide classroom training for permit technicians and supervisors. | Ongoing | Two full days of onsite classroom training were completed February 10–11, 2026, delivered by Steve Burger, CBO, of Bureau Veritas. The Complete Permit Technician curriculum covered code history, overview and use, legal aspects of code administration, and the permitting process.<br><br>During this reporting period, two Permit Technicians also attended the Basic Steps in a Structural Plan Review course to further strengthen plan review knowledge and technical skills. Permit Technician staff are additionally scheduled to attend upcoming California Building Officials (CALBO) Training Institute Education Weeks for continued professional development on current California Building Code requirements and plan review procedures. |

| | | | |
|---|---|---|---|
| | | | Staff will continue to seek and document ongoing professional development opportunities throughout the CAP implementation period, with additional training informed by quality assurance findings and operational needs. |
| **B-4** | Provide two weeks of embedded trainer support at the permit counter. | Completed April 2026 | The embedded trainer support has been implemented and sustained well beyond the initial two-week threshold. Jessie Oswald with Bureau Veritas, maintained an ongoing embedded presence with the Town between December 2025 to April 2026, providing direct in-person oversight and support across building division operations, including the permit counter. |
| **B-5** | Revise the permit procedures manual. | Completed February 2026 | Effective December 1, 2025, the services of Jessie Oswald of Bureau Veritas were engaged to revise and update the Town of Paradise permit procedures manual, with a target completion date of January 31, 2026. This initiative was undertaken to ensure that all procedural documentation is current, accurate, and aligned with best practices.<br><br>The revised Permit Technician Manual has been completed and reflects current operations across all key functional areas of the Building Division. The manual includes step-by-step guidance on GovWell record types and workflows, building permit submittal requirements for residential, manufactured home, and commercial projects, plan review routing procedures, fee calculation and invoicing processes for plan review, issuance, and development impact fees, wastewater application review and clearance-to-record procedures, and signature verification and contractor license requirements for permit issuance.<br><br>The manual serves as a comprehensive operational reference for permit technicians and supports consistency, accountability, and quality in permit counter operations going forward. |
| **B-6** | Require ICC Permit Technician Certification for classification. | Ongoing | Any changes to the minimum qualification requirements for employees in the Permit Technician classification trigger meet-and-confer obligations between the Town and Union representatives. Human Resources & Risk Management Director has initiated coordination of this process. Meet-and-confer scheduling is underway and more information will be included in future updates to the CAP. |
| **B-7** | Provide updated public informational materials. | Completed August 2026 | A comprehensive suite of more than 25 public-facing documents has been developed, updated, and published, spanning community guidance and CAP intake, contractor and owner-builder resources, buyer and pre-construction guidance, plan and site checklists, and code compliance references. |

| | | | |
|---|---|---|---|
| | | | During this reporting period, staff developed and published a new Accessory Structures Informational Handout, including a Quick Reference Guide to assist customers in understanding permit requirements and applicable code provisions. These materials supplement the Community Resource Guide, CAP Community Intake Form, and existing residential, commercial, WUI, solar, and CalGreen guidance.<br><br>These materials are available at the Building Resiliency Center and on the Town's Building webpage and will continue to be updated as procedures and code requirements evolve. |
| **B-8** | Establish comprehensive permit applicant verification and supervisory authorization controls for business entities, contractors, and owner-builder applicants. | Completed June 2026 | Standardized permit applicant verification controls have been integrated into building division operations during this quarter through two primary mechanisms.<br><br>First, contractor information verification has been embedded as a standard first-line requirement across all 2026 inspection checklists developed under C-7. Every inspection type — from underground plumbing and electrical through framing, insulation, drywall, roofing, and final — requires documented confirmation of contractor information before the inspection proceeds. This systematically anchors verification to each stage of the permit lifecycle rather than solely at intake.<br><br>Second, staff received targeted professional development directly relevant to owner-builder and contractor authorization requirements. The April 2, 2026 Shasta Cascade Chapter ICC monthly meeting featured a presentation by Hal Clay, Special Investigator with the California Contractors State License Board, covering owner-builder provisions and B contractors working out of class — two of the specific compliance areas identified in the original audit findings.<br><br>Additionally, the updated public-facing materials completed under B-7 — including the Owner-Builders Pamphlet, What is an Owner-Builder, Before Hiring a Contractor, Checklist for Prescreening Contractors, CSLB Ten Tips, and ADV Contractor guide — support applicant-side awareness of legal requirements consistent with Business and Professions Code section 7044 and Labor Code section 2750. Verification requirements have been incorporated into formal permit procedures and quality- |

| | | | |
|---|---|---|---|
| | | | assurance reviews and will continue to be monitored through the ongoing permit-intake QA process described under B-9. |
| **B-9** | Establish a quality assurance function for permit intake oversight. | Ongoing | The permit intake quality assurance function has advanced from framework development into active review. Standardized intake procedures and verification requirements provide the procedural foundation for periodic sampling and oversight.<br><br>Bureau Veritas completed Permit Intake QA reviews for both June and July 2026. The reviews confirmed that standardized permit intake procedures are being consistently applied, support uniform documentation, improve accountability, and promote a consistent permitting process.<br><br>Ongoing QA reviews will continue to be used to identify training needs, procedural refinements, and opportunities for continuous improvement. |

**Table C: Building Inspection Process Reforms**

| ID# | Recommendation | Phase | Current Status & Actions |
|---|---|---|---|
| C-1 | Provide in-person, in lieu of existing online-only, ethics training for inspectors. | Completed March 2026 | In-person ethics and professional conduct training was completed in March 2026. On March 11 and 12, 2026, the Town hosted two days of on-site training delivered by Gerry Preciado of 34th Street Training, covering two required subject areas:<br><br>Workplaces That Work for All of Us — Harassment Prevention, satisfying the requirements of AB1825 (supervisory), SB1343 (non-supervisory), and AB1661 (local agency officials); and Preserving the Public Trust: Ethics for Public Entity Officials, satisfying the requirements of AB1234.<br><br>Sessions were held at both the Building Resiliency Center and Town Hall Council Chambers to accommodate all available staff. Training was conducted in an interactive, in-person format rather than the online format typically used for state-mandated training, consistent with the audit's recommendation for more engaging and effective delivery. Sign-in sheets and training materials are on file. |
| C-2 | Provide classroom training for inspection of residential buildings, plan reading, and calculation interpretation. | Ongoing | Classroom training for inspection and plan review staff remains active. Building Division staff attended the 2026 SVABO Training Institute, completing courses addressing the 2025 California Building Code, Energy Code requirements, structural plan review, Mechanical and Plumbing Code changes, generators and transformers, and residential plumbing and mechanical inspection and plan review.<br><br>During this reporting period, Building Inspection staff completed additional professional development addressing truss calculations, residential fire sprinkler systems, shipping container homes, Energy Storage System requirements, residential deck installation and code requirements, and Electric Vehicle charger and battery charging requirements.<br><br>Building Inspection and Plan Review staff are also scheduled to attend upcoming CALBO Training Institute Education Weeks for continued training on current California Building Code requirements, inspection practices, and plan review procedures. Training will continue to be documented and informed by QA findings and operational needs. |

| | | | |
|---|---|---|---|
| **C-3** | Employ a Field Training Officer (FTO) for at least six months. | Completed April 2026 | The six-month FTO engagement was completed in April 2026 through three progressive phases designed to provide inspectors with field coaching and exposure to multiple professional perspectives.<br><br>Phase 1, from October 2025 through January 2026, provided embedded field oversight through BPR Consulting. Phase 2, from February through March 2026, transitioned to a Bureau Veritas FTO team that conducted weekly ride-alongs with all three building inspectors, covering foundation, framing, mechanical, electrical and plumbing rough-in, roofing, solar and final inspections. Phase 3, completed in April 2026, included off-site ride-alongs at active inspection sites in Rocklin, exposing inspectors to commercial, multistory and other complex inspection types not routinely encountered during Paradise's residential rebuilding.<br><br>The program documented improvement in plan referencing, inspector confidence and code-specific knowledge, including Wildland-Urban Interface requirements, corrugated stainless steel tubing gas piping, Title 24 energy compliance and truss calculations. Continued professional development and quality-assurance reviews are addressed under C-2, C-4 and C-6. |
| **C-4** | Provide off-site professional training for inspectors. | Ongoing | Off-site professional development remains an active component of the Building Division's training program. Staff continue to participate in Shasta Cascade Chapter of the International Code Council activities and regional training opportunities that support code consistency and peer collaboration.<br><br>During this reporting period, staff completed additional training in residential fire sprinkler systems, shipping container homes, Energy Storage System requirements, residential deck installation and code requirements, and Electric Vehicle charger and battery charging requirements. Building Inspection and Plan Review staff are also scheduled to attend upcoming CALBO Training Institute Education Weeks.<br><br>Fire Prevention Inspector Shane DeValera was elected Education Chair for the Shasta Cascade Chapter of the International Code Council. He will support the Chapter's professional development and educational programs alongside Town Building Plan Reviewer Patti Samons, who currently serves as Chapter President. |

| | | | |
|---|---|---|---|
| **C-5** | Require Building Inspector II to obtain a second certification within 90 days of return. | Completed January 2026 | Second ICC certification obtained for the position. |
| **C-6** | Establish a quality assurance function for inspection oversight. | Ongoing | The quality assurance function for inspection oversight remains active through Bureau Veritas. The 2026 Building Inspector Quality Assurance Checklist provides the structured framework for permit and plan verification, code compliance, inspection execution, documentation and photo verification, consistency review, customer communication, and professional conduct.<br><br>Bureau Veritas completed Building Inspection QA reviews for both June and July 2026. The July review found that inspection procedures were consistently followed and appropriately documented. Inspection records demonstrated adherence to established Town inspection protocols, with sufficient documentation to support inspection results and code compliance determinations.<br><br>QA findings will continue to be used to validate implementation, identify training needs, and support ongoing procedural improvement. |
| **C-7** | Implement uniform inspection checklists and photo documentation. | Completed June 2026 | As reported when the CAP was adopted, photographic inspection procedures had already been implemented, while uniform inspection checklists were being developed in collaboration with Bureau Veritas. The checklists have since been finalized, and both requirements are now fully implemented as standard Building Division practices.<br><br>The 2026 Residential Stick-Built Building Inspection Checklists, 2026 Manufactured Residential Building Inspection Checklists, and all over-the-counter inspection checklists for electrical, plumbing, mechanical, solar, pools, and fire systems have been finalized and adopted. Each checklist includes a photo documentation requirement specific to the inspection type, with required photos called out at the checklist level — for example, test gauge readings, trench routing, rebar and anchor details, and key structural elements — ensuring photographic evidence is captured systematically rather than at inspector discretion.<br><br>Photo documentation requirements are also formally embedded in the 2026 Building Inspector Quality Assurance Checklist under Section 4 — Documentation and Photo Verification, which |

| | | | |
|---|---|---|---|
| | | | requires inspection results to be entered into GovWell and clear, labeled photos taken of the overall work area, key inspected components, and any deficiencies. Notes must be complete, professional, and objective, with corrections referencing applicable code sections.<br><br>The FTO program reinforced photo-documentation practices during its six-month engagement through real-time field coaching, and these requirements are now functioning as standard operational practice across the inspection team. |
| **C-8** | Implement inspection performance accountability and final inspection controls. | Ongoing | Formal inspection performance accountability protocols and final inspection controls are now in active implementation, supported by Bureau Veritas quality assurance reviews, standardized inspection checklists, photo documentation requirements, and procedures requiring verification that prior correction notices are resolved before final approval.<br><br>Bureau Veritas completed Final Inspection QA reviews for both June and July 2026. The July review concluded that standardized final inspection procedures have improved consistency, documentation, and accountability throughout the final inspection process. Inspectors demonstrated a thorough understanding of established procedures and consistently documented final inspection activities.<br><br>These controls continue to build on the standardized inspection checklists under C-7 and the inspection QA framework under C-6. Full implementation remains targeted for December 2026. |

**Table D: Public Support & Complaint Resolution**

| ID# | Recommendation | Phase | Current Status & Actions |
|---|---|---|---|
| D-1 | Establish an ombudsman role to support homeowners navigating construction concerns. | Ongoing | The ombudsman function is active and operational through the Assistant Town Manager's office. The CAP Complaint Ordinance has been formally adopted and launched, providing a structured pathway for community members to submit building-related concerns for review and tracking.<br><br>Homeowners and community members are encouraged to engage directly with the Assistant Town Manager, who is available for walk-in ombudsman office hours every Wednesday and Thursday from 11:00 a.m. to 1:00 p.m. at Town Hall, 5555 Skyway, Paradise, CA 95969. Appointments outside of office hours are also available Monday through Thursday during normal business hours and may be scheduled by emailing mmattox@townofparadise.com.<br><br>The ombudsman role is designed to help homeowners understand their concern, identify the appropriate resolution pathway, and navigate available resources — whether those resources are within Town authority or through external agencies such as CSLB, civil court, or state licensing boards. This function is informational and navigational in nature; it does not adjudicate disputes, reopen inspections, or assign liability. |
| D-2 | Improve transparency regarding complaint pathways and available resources. | Ongoing | The Town continues to provide a clear, publicly accessible process for submitting Building Code complaints and CAP feedback. Ordinance No. 655, codified as Paradise Municipal Code Section 15.02.065, established the formal complaint process described in Section 2.2 of this report.<br><br>A combined Building Code Complaint and CAP Feedback Form serves as both the formal complaint-submission mechanism and the general stakeholder-feedback channel for CAP monitoring. The Town has also published a Community Resource Guide addressing concerns outside Town authority, including contractor disputes, CSLB processes, civil remedies, the Right to Repair Law, other professional licensing agencies, consumer protection and manufactured housing oversight.<br><br>The complaint form, Community Resource Guide, ordinance, independent audit, adopted CAP and quarterly reports are available on the Town's dedicated Building Code Complaint and Corrective Action Plan webpage. |

**Table E: Future Supplemental Recommendations**

| *ID#* | *Recommendation* | *Implementation Phase* | *Current Status & Actions* |
|---|---|---|---|
| **N/A** | | | |

**Current Status:** No supplemental recommendations are proposed during this reporting period. Findings from the expanded permit analysis and future quality-assurance reviews will be evaluated for potential inclusion in Table E.

## 4. CAP Timeline Update

The following timeline provides a high-level sequencing framework for implementation of the corrective actions identified in this Corrective Action Plan. It is intended to communicate the Town's anticipated approach to prioritization, coordination, and phased execution rather than to establish rigid deadlines for individual actions.

The timeline reflects the reality that corrective actions vary in complexity, resource requirements, and dependency on external factors such as recruitment, training availability, contractual services, and policy adoption. Accordingly, the phases identified below represent logical groupings of work designed to stabilize operations, strengthen institutional capacity, and integrate long-term improvements in a deliberate and sustainable manner.

As corrective actions progress, timelines may be refined to reflect actual implementation conditions, evolving priorities, or additional findings from expanded analysis. Any such adjustments will be documented in subsequent CAP updates to maintain transparency and accountability.

As of this reporting period, Phase 1 is complete, Phase 2 is nearing completion, and Phases 3 and 4 remain underway.

| Phase | Period | Primary Activities |
|---|---|---|
| Phase 1: Stabilization | November 2025 to February 2026 | Staff reinstatement (completed); FTO engagement (completed), continued supplemental staffing (ongoing), initiation of training (completed); organizational restructuring decisions (completed); Corrective Action Plan adoption and initiation (completed). |
| Phase 2: Infrastructure Build-Out | December 2025 to November 2026 (updated from August 2026) | Development of revised procedures (complete); permit and inspection procedure rollouts (complete); adoption of new manuals (complete); implementation of certification requirements (ongoing); expanded statistical analysis of inspections (ongoing), themes and programmatic needs (ongoing). Initial advisory review of CAP implementation progress by Council-authorized Ad Hoc Committee (completed). |
| Phase 3: Public Interface Improvements | February 2026 to February 2027 | Ombudsman role implemented through the Assistant Town Manager (ongoing); expanded public guidance (ongoing); transparency reporting (ongoing). |
| Phase 4: Quality Assurance Integration | April 2026 to February 2027 | Long-term QA/oversight (ongoing); system improvements; metrics reporting; close-out of corrective items (ongoing). |

**Town of Paradise**

**CAP Standing Committee** **Agenda Item: 2b**

**Date: November 5, 2026**

| | |
|---|---|
| **ORIGINATED BY:** | Tony Lindsey, Community Development Director – Building & Code Enforcement |
| **REVIEWED BY:** | Marc Mattox, Assistant Town Manager |
| **SUBJECT:** | Corrective Action Plan (CAP) – Implementation Status Update |
| **REQUESTED ACTION:** | Receive and file the Building Division CAP implementation update. |

**Executive Summary**

This report provides the CAP Standing Committee with an update on Building Division implementation activities, including continuing education, independent quality-assurance (QA) reviews, staffing continuity, and improved public access to inspection information. The September and October QA reviews completed reported consistent application and documentation of standardized procedures for permit intake, building inspections, and final inspections. Staff development and system transparency initiatives remain ongoing.

**Background and Purpose**:

The Building Division continues implementing standardized processes and ongoing oversight associated with the CAP. This standing report summarizes activities and highlights near-term operational considerations.

**CAP Implementation and Quality Assurance:**

The September and October Quality Assurance (QA) Reviews were completed by third party consultant addressing the following CAP measures:

- C9 – Permit Intake: Standardized intake procedures continued to support consistent documentation, accountability, and a uniform permitting process.
- C6 – Building Inspections: Inspection procedures were consistently followed and documented. Records provided sufficient support for inspection results and code-compliance determinations.
- C8 – Final Inspections: Standardized final inspection procedures supported consistency and accountability. Inspectors demonstrated understanding of procedures and documented final inspection activities.

Taken together, the reported findings reinforce the implementation of the CAP measures and adherence to the Building Division's standardized procedures.

**Professional Development and Technical Training:**

Staff participated in training and continuing education through the California Association of Permit Technicians, the Shasta Cascade Chapter of ICC, California Building Officials (CALBO), and the Town's contracted surveyor, Jim Riotto. Subjects included:

- California Association of Permit Technicians – Meeting and Training
    - *Permit Technician Essentials, presented by Shums Coda University.*
- Shasta Cascade Chapter of ICC – Meetings and Training
    - *Interpreting CF-1R Report and Working with Enforcement Field Inspectors*
    - *Curbless Shower/Shower Receptor – CPC 408.6*
- California Building Officials Education Week
    - *2025 California Residential Code Significant Changes*
    - *Plumbing, Electrical, and Mechanical Plan Review: Practical Approaches and Common Chalenges*
    - *Permit Technician Career Advancement: Core Essentials*
    - *Permit Technician Career Advancement: How to Properly Screen Plans for Successful Permit Services*
    - *Energy Storage Systems Installation Fundamentals*
    - *Plan Review Fundamentals: Code Complaince and Best Practices*
    - *Understanding Load Path in Wood Construction*
    - *Residential Electrical Fundamentals*
    - *Residential Inspection Fundamentals Updated for 2025: Code Compliance and Best practices*
    - *Plumbing and Mechanical Inspection: Practical Approaches and Common Challenges*
    - *Energy Storage Systems Installation Fundamentals*
    - *State laws Enforced by Building Departments for 2025-2026*
    - *Advanced Topics in Means of egress for 2025 California Building Code*
    - *2025 CBC Chapter 11B Accessibility for Public and Commercial Buildings*
    - *2025 CBC Chapter 11A Accessibility*
    - *Safety Assessment Program: Disaster Response Training for Evaluators and Coordinators*
- Town's Contracted Surveyor, Jim Riotto
    - *Types of Easements in California*

**Upcoming Training and Service Impacts**

Building Division staff are scheduled to attend Structural Fundamentals of Residential Wood-Framed Construction on November 9, 2026. The course addresses residential structural systems, framing principles, load paths, and code-compliant wood-frame construction.

Building inspections will be paused November 9 to allow Building Inspection and Plan Review staff participation. Advance notification is planned through social media, website banners, direct communication in the field and at the Building Resiliency Center, and an email to active permit holders one week before the training. These measures are intended to reduce scheduling impacts.

**Recruitment and Continuity of Operations**

Building Plans Examiner Patti Samons has announced her retirement, effective December 30, 2026, creating an anticipated vacancy within the Building Division. In preparation for this transition, the Town initiated a competitive recruitment process, including posting the position, reviewing applications, and conducting candidate interviews. Following the interview process, one candidate was selected to advance through the remaining stages of the hiring process. These efforts are intended to support continuity of plan review services, maintain operational efficiency, and minimize potential disruptions during the staffing transition.

**Public Dashboard and Transparency**

The Town's Public Dashboard has been updated to provide expanded access to building inspection records, including inspection type, inspection results, assigned inspector, and inspection date. A new print feature has also been added, allowing members of the public to print permit information directly from the dashboard. These enhancements improve public access to permitting and inspection records, increase transparency, and support the Building Division's ongoing efforts to improve customer service and accessibility through electronic permitting.

**Next Steps**

- Continue Professional and Technical Training CAP measures B3, B4, C2, C4
- Continue monthly periodic independent QA reviews and document implementation of CAP measures C6, C8, and C9.
- Complete November 9 training and issue advance notices regarding the inspection suspension.
- Continue the plans examiner recruitment process and plan for operational continuity.
- Maintain the public inspection dashboard and evaluate opportunities to improve reporting and customer access.

**Fiscal Impact**

No fiscal determination is made in this report.

**Recommended Committee Action**

Staff recommends that the CAP Standing Committee receive and file this status report and provide direction, as appropriate, regarding continued implementation and reporting of CAP measures.

**Town of Paradise**

**CAP Standing Committee** **Agenda Item: 2c**

**Date: November 5, 2026**

**ORIGINATED BY:** Marc Mattox, Assistant Town Manager

**SUBJECT:** Building Code Complaint Ordinance Update

**REQUESTED ACTION:** None, Information Only

**Executive Summary**

Staff will update the Committee on the Building Code complaint process and proposed amendments to Paradise Municipal Code Section 15.02.065. The Town Council is scheduled to consider the ordinance amendments at its November 10, 2026 meeting.

**Background and Purpose**:

The ordinance established a formal process for reviewing eligible Building Code complaints, including independent review, notice and an opportunity for the permit applicant to respond, written determinations, and appeal rights. The proposed amendments clarify the process and add safeguards for a narrowly limited extraordinary finding that may result in two Strikes for one project.

As of November 2, the status report tracks 25 submissions: 21 received under the ordinance and four earlier Community Intake Form submissions. Fifteen are closed, three are paused, and seven remain open. Three Notices of Determination have been issued; one resulted in a Strike, which has been posted.

**Fiscal Impact**

No direct fiscal impact is associated with this Committee update. Costs to administer the process depend on complaint volume, complexity, and the independent review services required.

**Recommended Committee Action**

None, background information only.

**Attachments**

- Building Code Complaint Ordinance for 2nd Reading on November 10, 2026

**TOWN OF PARADISE**
**ORDINANCE NO. ___**

**AN ORDINANCE OF THE TOWN OF PARADISE ADOPTING NEW SECTION 15.02.065, MAKING FINDINGS OF FACTS RELATING TO BUILDING CODE COMPLAINTS, ESTABLISHING A PROCESS TO RESPOND TO BUILDING CODE COMPLAINTS, AND AUTHORIZING EXTRAORDINARY LIFE, HEALTH, SAFETY OR CUMULATIVE PROJECT IMPACT DETERMINATIONS**

The Town Council of the Town of Paradise, State of California does hereby **ORDAIN AS FOLLOWS:**

**SECTION 1.** Findings. The Town Council finds and declares as follows:

a) Under Article XI, Section 7 of the California Constitution local agencies may make and enforce all local, police, sanitary and other ordinances within their jurisdiction, provided they do not conflict with general state laws; and

b) The Town Council of Paradise hereby finds that the public health, safety, and welfare of the Town of Paradise will be best protected and served by ensuring that all buildings, structures, electrical, gas, mechanical, and plumbing systems comply with the Paradise Municipal Code which adopted and incorporated several sections of the California Building Standards Code (California Code of Regulations, Title 24); and

c) The Town Council of the Town of Paradise desires to set forth certain procedures to ensure the enforcement of the Building Code by creating a system to process, review and manage complaints alleging violations of the Building Code.

d) The Town Council further finds that certain Building Code violations may, because of their nature, severity, extent, or cumulative effect within an issued permit for one Assessor's Parcel Number, present an extraordinary threat to the health, safety, or welfare of occupants or the public. In such limited circumstances, the Town Council finds it appropriate to authorize an enhanced enforcement consequence, subject to clear written findings, notice, and the appeal procedures established by this Ordinance.

**SECTION 2.** Section 15.02.065 is added to the Paradise Municipal Code as follows:

**15.02.065 Building Code Complaint Procedure; Review and Determination by the Independent Reviewer.**

A. Definitions

1. Building Code – The Paradise Municipal Code applicable to buildings and construction, including but not limited to Title 15 of the Paradise Municipal Code.

2. Permit Applicant (PA) – the individual or entity that applied for and was issued a permit for the construction of the building, structure, electrical, gas, mechanical, or plumbing system. In the event the Permit Applicant is an entity, the principals and signatory on the permit application shall be deemed to be Permit Applicants, as well as the entity.

3. Independent Reviewer – The Independent Reviewer shall be a third-party consultant retained by the Town responsible for the objective review of complaints, evidence, inspections, and issuance of Notices of Determination regarding Building Code compliance. The Independent Reviewer shall not have had a primary role in supporting or facilitating the course of construction of the subject project.

4. Strike – A Strike is a finding against a Permit Applicant that a Building Code complaint has been deemed founded following the issuance of a Notice of Determination and either: (a) an appeal by the Permit Applicant has been denied or has not resulted in the Notice of Determination being overturned; or (b) the Permit Applicant has failed to timely file an appeal, as outlined in this Section. A Strike shall be removed or inactivated only upon remediation of the Building Code violation, confirmed in writing by the Building Official as outlined in this Section. Except as provided in Paragraph H.2 of this Section for an Extraordinary Project Impact Determination, no more than one Strike may arise from the same subject project.

5. Subject Project – The building, structure, electrical, gas, mechanical, plumbing system, or related work performed under the permit that is the subject of a Building Code complaint and Notice of Determination.

6. Extraordinary Project Impact Determination – A written finding by the Independent Reviewer that either:

a. One or more substantiated Building Code violations which create, or if not promptly corrected are reasonably likely to create, an extraordinary risk to life, health, or safety; or

b. The number, nature, extent, location, repetition, or interrelationship of substantiated Building Code violations within the Subject Project are cumulatively so serious or pervasive that they demonstrate an egregious failure to comply with the Building Code.

An Extraordinary Project Impact Determination shall not be based solely on the number of violations. The determination must identify the specific facts, Building Code sections, and reasoning supporting the finding.

B. Every building permit granted under this title or any section hereof is granted and accepted by all parties with the express understanding that the building, structure, electrical, gas, mechanical, or plumbing system must meet the requirements of the Building Code. Following issuance of the building permit, and for a period of 10 years thereafter, if a property owner suspects the PA did not adhere to the Building Code, a complaint shall be submitted through the Town's Corrective Action Plan (CAP) Intake Form as the exclusive initial point of contact. Complaints submitted outside of the CAP Intake process shall not be accepted. The complaint must include: the location of the building, structure, electrical, gas, mechanical, or plumbing system, the nature of the alleged violation, and efforts the property owner has undertaken to obtain relief from the PA prior to submitting the complaint. Town staff shall conduct an initial completeness and eligibility screening and refer qualifying complaints to the Independent Reviewer.

All complaints, reviews, and determinations shall be documented and tracked in accordance with the Town's Building Division Corrective Action Plan (CAP).

C. The Independent Reviewer shall review all complaints submitted through the CAP Intake Form and determine whether the complaint references a potential violation of the Building Code. Complaints that reference aesthetic issues or issues that do not relate to the requirements of the Building Code will not be considered. If the complaint alleges an issue that may violate the Building Code, the Independent Reviewer shall issue a Notice of Complaint (NOC) that will be sent to the PA by certified mail, return receipt requested, or by another method reasonably calculated to provide actual notice. The NOC must include the specific location of the building, structure, electrical, gas, mechanical, or plumbing system that is the subject of the complaint and the section of the Building Code, that has allegedly been violated. Within 10 business days of issuance of the NOC, the PA may respond with an explanation of how the requirements of the Building Code were met or with documentation refuting the allegations in the NOC.

If the Independent Reviewer preliminarily determines that the alleged violations may warrant an Extraordinary Project Impact Determination, the NOC shall clearly state that enhanced enforcement, including the potential issuance of two Strikes arising from a single Subject Project, is under consideration. The NOC shall identify the alleged facts and Building Code provisions supporting the preliminary determination and shall provide the PA an opportunity to submit information specifically addressing why an Extraordinary Project Impact Determination should not be made.

D. After receiving the PA's response to the NOC, or if the PA fails to submit a timely reply to the NOC, the Independent Reviewer may contact the owner of the building, structure, electrical, gas, mechanical, or plumbing system to schedule an inspection. In the event an inspection is requested, the property owner and the PA shall have the right to have one representative present at the inspection.

E. Within 10 business days following the gathering of evidence as outlined in Paragraphs C and D of this Section, the Independent Reviewer shall review the evidence and issue a written Notice of Determination (NOD), which shall be sent by the Town Clerk to the property owner and PA by certified mail, return receipt requested, or by personal service. For purposes of computing appeal deadlines, the NOD shall be deemed received five calendar days after mailing.If the Independent Reviewer determines that the complaint has been unfounded, the complaint will be dismissed. If the Independent Reviewer confirms the existence of a Building Code violation, the NOD must include the specific location of the building, structure, electrical, gas, mechanical, or plumbing system that is the subject of the NOD and the section of the Building Code pertaining to the violation.

If the Independent Reviewer makes an Extraordinary Project Impact Determination, the NOD shall separately and clearly state that finding in writing. If the NOC did not allege that violations may warrant an Extraordinary Project Impact Determination, the Independent Reviewer must issue a supplemental notice to the PA identifying the factors that may support the more severe finding and providing the PA 10 business days to respond before issuing a final NOD that includes an Extraordinary Project Impact Determination. The NOD shall identify each substantiated Building Code violation supporting the determination; explain the extraordinary life, health, or safety risk or the cumulative and egregious project-wide impact; and state that, if the NOD becomes final under Paragraphs F and G of this Section, the PA will receive two Strikes arising from the Subject Project pursuant to Paragraph H.2. The NOD shall also advise the PA of the right to appeal both the underlying Building Code findings and the Extraordinary Project Impact Determination.

F. In the event that a PA disagrees with the NOD, the PA may appeal the determination by submitting a written appeal to the Town Council within 10 calendar days of receipt of the NOD.

The appeal shall be submitted to the Town Clerk. The appeal shall include evidence refuting the violation stated in the NOD and demonstrating that the requirements of the Building Code have been met. The Town Council shall review the appeal and all documents reviewed by the Independent Reviewer at a regular or special meeting, at which the property owner and the PA may appear and provide a statement to the Town Council. The statement by the property owner and PA shall not exceed 10 minutes each, unless additional time is needed to address questions by the Town Council.

G. The Town Council may, but is not required to, overturn the NOD issued by the Independent Reviewer by majority vote of the Council Members in attendance at the meeting. In the event that the NOD is overturned, the complaint shall be dismissed as unfounded. If the NOD is not overturned or if the PA fails to file a timely appeal to the NOD, the determination in the NOD is final for purposes of administrative review and there will be no further administrative opportunities for appeal. Nothing herein shall be construed to limit judicial review as otherwise provided by law.

H. Strikes and Enhanced Enforcement Consequence.

1. Following an appeal by the PA and a failure to overturn the NOD, or in the event that a PA fails to timely file an appeal of an NOD, the PA shall receive one Strike. The Strike shall remain active until the PA remediates the Building Code violation to the satisfaction of the Building Official, as defined in Section 2.12.054.
2. Notwithstanding Paragraph H.1, where an NOD includes an Extraordinary Project Impact Determination and that determination becomes final following the appeal process set forth in Paragraphs F and G, or following the PA's failure to timely file an appeal, the PA shall receive two Strikes arising from the Subject Project. Both Strikes shall remain active until the violations supporting the Extraordinary Project Impact Determination have been remediated to the satisfaction of the Building Official.
3. A proposed Extraordinary Project Impact Determination in a NOC shall not suspend permits or deny new permit applications before the NOD becomes final under this Section. The PA may appeal the Extraordinary Project Impact Determination on the same terms and within the same time period applicable to an appeal of the underlying NOD.

I. If a PA has two or more Strikes in effect that have not been removed or inactivated, all new permit applications for any buildings, structures, electrical, gas, mechanical, or plumbing systems shall be denied and all existing permits in the issued status to the PA will be suspended until all of the active Strikes on the PA's record have been removed.

J. It shall be unlawful for any Permit Applicant, or any person, firm, or corporation with actual knowledge of the suspension, to erect, construct, enlarge, alter, repair, move, improve, remove, convert, demolish, occupy or maintain any real property, building, structure, or building service equipment that is the subject of a suspended permit, or cause or permit the same while the permit is suspended. A violation of this paragraph shall constitute an infraction, punishable as provided by applicable law.

K. Litigation-Related Complaints. At any point during the above-described process, if the Town determines that a Building Code complaint concerns matters that are the subject of pending or reasonably anticipated civil litigation, the Town may defer processing the complaint under this Section upon consultation with the Town Attorney. Nothing in this paragraph limits the Town's authority to investigate and enforce an imminent Building Code, health, or safety violation under this or any other applicable law.

**SECTION 3.** Severability. If any provision of this ordinance or the application thereof to any person or circumstances is for any reason held to be invalid by a court of competent jurisdiction, such provision shall be deemed severable, and the invalidity thereof shall not affect the remaining provisions or other applications of the ordinance, which can be given effect without the invalid provision or application thereof.

**SECTION** 5**.** CEQA Exemption. Adoption of this Ordinance is exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15061(b)(3), as adoption of a Building Code complaint and enforcement procedure is not a project that may have a significant effect on the environment, and, to the extent applicable, pursuant to California Public Resources Code Section 21080(b)(3) regarding projects to maintain, repair, restore, or replace property or facilities damaged or destroyed as a result of a declared disaster and Section 21080(b)(4) regarding actions to mitigate or prevent an emergency, and CEQA Guidelines Section 15269(a) regarding maintaining, repairing, restoring, demolishing, or replacing property or facilities damaged or destroyed as a result of a disaster stricken area in which a state of emergency has been proclaimed by the Governor pursuant to the California Emergency Services Act, commencing with Section 8550 of the California Government Code.

**SECTION 5.** Publication. This ordinance shall take effect thirty (30) days after the date of its passage. Before the expiration of fifteen (15) days after its passage, this ordinance or a summary thereof shall be published in a newspaper of general circulation published and circulated within the Town of Paradise along with the names of the members of the Town Council of Paradise voting for and against same.

**PASSED AND ADOPTED** BY THE Town Council of the Town of Paradise, County of Butte, State of California, on this 13th day of October, 2026, by the following vote:

**AYES:**

**NOES:**

**ABSENT:**

**ABSTAIN:**

_____
Steven Crowder, Mayor

ATTEST:

_____
Melanie Elvis, Town Clerk

APPROVED AS TO FORM:

_____
Scott E. Huber, Town Attorney