



**Bureau of Planning and Sustainability**  
Innovation. Collaboration. Practical Solutions.

March 4, 2019

Representative Nancy Nathanson, Chair  
House Committee on Revenue  
900 Court Street NE, HR A  
Salem, OR 97301

RE: HB 2663

Dear Chair Nathanson and Members of the Committee:

The City of Portland supports HB 2663 and the direction to the Department of Consumer and Business Services to initiate a rulemaking process to eliminate unnecessary building code provisions that restrict the conversion of existing single-family dwellings into housing having four or fewer dwelling units. The City of Portland has studied barriers to converting existing single-family dwellings and identified the requirements of the Oregon Structural Specialty Code to be a leading barrier to the economic and construction viability of such conversions. Changes to the commercial and/or residential building code as directed by HB 2663 could provide a more cost-effective means of producing housing units while retaining existing and historic structures.

However, HB 2663 does not address fire and life safety concerns. To ensure occupant safety, the rulemaking process should include provisions such as:

- Requiring sprinklers, but allowing type 13D sprinkler systems for three- and four-unit conversions, provided the structure is not more than three stories above grade or larger than 6,000 square feet and does not contain any room over 400 square feet;
- Type C visitability requirements as outlined in the International Code Council (ICC) A117.1 (2009);
- The provisions of the Oregon Structural Specialty Code regarding accessibility; and
- Factors common to existing structures, such as fire separation distance, construction type, and area of wall openings.

---

The Bureau of Planning and Sustainability is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact at 503-823-7700 or use City TTY 503-823-6868, or Oregon Relay Service 711.

Traducción o interpretación	Chuyển Ngữ hoặc Phiên Dịch	翻译或传译	Письменный или устный перевод	Traducere sau Interpretare
الترجمة التحريرية أو الشفهية	Письмовий або усний переклад	翻訳または通訳	Turjumida ama Fasiraadda	ການແປພາສາ ຫຼື ການອະທິບາຍ

503-823-7700 | [www.portlandoregon.gov/bps/71701](http://www.portlandoregon.gov/bps/71701)



City of Portland, Oregon | Bureau of Planning and Sustainability | [www.portlandoregon.gov/bps](http://www.portlandoregon.gov/bps)  
1900 SW 4th Avenue, Suite 7100, Portland, OR 97201 | phone: 503-823-7700 | fax: 503-823-7800 | tty: 503-823-6868

The City of Portland also supports the creation of a tax credit to encourage property owners to add housing units within existing single-dwelling structures. Providing such an incentive would support the added cost of conversion, reduce the likelihood that existing and historic buildings will be demolished, and assist local governments in advancing their historic preservation and housing production programs.

Please find attached the Residential Infill Project Internal Conversion Report, which details opportunities and challenges for converting existing single-family dwellings into multiple dwelling units. Passage of HB 2663 would achieve two of the four recommendations included in the report.

The City of Portland encourages your support for HB 2663. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Zehnder". The signature is fluid and cursive, with a long horizontal stroke at the end.

Joe Zehnder  
Interim Director

