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January 24, 2017

Mark Long  
Administrator, Oregon Building Codes Division  
1535 Edgewater St. NW  
Salem, OR 97304

Dear Mr. Long,

My name is Madeline Kovacs, and I am the Portland for Everyone Program Coordinator at 1000 Friends of Oregon, a nonprofit and advocacy group that has safeguarded Oregon's [statewide land use planning program](#) since 1975.

It has come to our attention that an application was recently submitted to the Oregon Building Codes Division (BCD) proposing a change to the commercial code (OSSC) that would allow three- and four- unit residential internal conversion projects to fall within the purview of the residential code (ORSC), instead.

1000 Friends is supportive of this proposed change, and we hope that you will recommend the application for consideration by the Oregon Structural Specialty Code Review Committee. We believe the building code change under consideration not only successfully incentivizes historic preservation – it also takes a simple, pragmatic step towards meeting our goals in environmental conservation, resident health & safety, and housing.

**Environmental Conservation:** Keeping materials out of our landfills is a vital environmental goal. Nationwide, the EPA estimates that between 65% - 85% of the Construction & Demolition waste stream is landfilled - and too often, this includes viable materials that could have been conserved and repurposed. In addition, while newer buildings can be more energy-efficient, the embodied energy in existing buildings can take many years to overcome. Introducing discrete density into existing neighborhoods while also preserving existing materials wherever possible is often the best possible combination of approaches where climate and energy conservation goals are concerned (especially when access to transit and other factors are considered).

**Health & Safety:** Many single-dwelling homes already have as many occupants as three- and four-unit internally divided homes, without meeting the fire & life safety standards that can be achieved by complying with ORSC. Thus, incentivizing conversion and rehabilitation projects to occur, triggering the ORSC where the OSSC would have proven infeasible, increases the likelihood that many improvements to safeguard residents' health will be made, including seismic upgrades, mitigation of hazardous materials, and fire/life safety.

**Housing Options:** As a state, we are falling short of meeting Statewide Land Use Planning Goal 10: "To provide for the housing needs of citizens of the state," planning our buildable lands such that we encourage the availability of "adequate numbers of needed housing units at price ranges and rent levels which are commensurate with the financial capabilities of Oregon households and allow for flexibility of housing location, type, and density" (OAR 660-015-0000(10)). In Portland, the

Residential Infill Project currently underway aims to re-legalize smaller forms of [“Missing Middle Housing”](#) in residential zones (duplexes, corner triplexes, cottage clusters, and internal conversions dividing older homes into as many as four internal units). The project reflects the desires of residents to preserve historic existing housing stock while also providing a wider range of more affordable options that serve increasingly smaller household sizes (on average). Internal conversions and adaptive reuse can often deliver housing at rates well below those for new construction or continued single-family use.

Municipalities around Oregon are engaged in similar conversations, looking to update their local zoning codes to accommodate lower- and middle-income people in amenity-rich, walkable communities. We are working with staff in Hood River, Eugene, and Bend, among others, on such code revision projects. We anticipate that the proposed change will complement efforts around the state to house more people efficiently & affordably while preserving the historic character of our communities.

Thank you so much for your time and consideration of the aforementioned application. Please contact me with any questions that you may have.

Sincerely,

A handwritten signature in cursive script that reads "Madeline Kovacs".

Madeline Kovacs  
Program Coordinator, Portland for Everyone  
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