



2075 Madrona Ave. SE
Suite 100
Salem, Oregon 97302

T 503-399-1500
F 503-399-0651

HomeBuildersAssociation.org

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Salem Planning Commission
PO Box 14300
Salem, OR 97309

Members of the Salem Planning Commission,

The Home Builders Association of Marion & Polk Counties appreciates that the Planning Commission will be receiving an information report at your February 24th meeting on Appendix Q of the Oregon Structural Specialty Code (OSSC) which would allow single-exit stairways in multifamily buildings up to four stories in height. Even though there is no action proposed at your meeting, we strongly encourage Salem to move toward adopting OSSC Appendix Q locally, as we believe this is a common-sense, evidence-based code modernization that can help Salem address its housing shortage, reduce construction costs and increase the supply of attainable housing - all without compromising life safety.

In December 2025, the State of Minnesota Department of Labor and Industry released a comprehensive, independent fire safety study - the *Minnesota Single-Exit Stairway Apartment Building Study* - conducted by Wiss, Janney, Elstner Associates, Inc. and Crux Consulting. The study was specifically mandated by the Minnesota Legislature and used fire modeling, egress modeling, and a risk-informed approach reviewed by a broad Technical Advisory Group of engineers, fire chiefs, fire marshals, building officials, firefighters, developers, and fire protection engineers.

The study's key findings are directly relevant to Salem's consideration of Appendix Q:

1. Sprinkler Systems Are the Critical Life Safety Factor - Not Stairway Count

The study found that nearly 97% of building fire risk is attributable to the sprinkler system failing to flow on demand - not the number of exit stairways. A properly operating automatic sprinkler system provides the most significant life safety protection. The number of stairways only becomes relevant in a narrow, multi-failure scenario: the sprinkler system fails AND the dwelling unit door is left open AND the stairway door is also open. This combination of failures represents a very small fraction of fire events.

Appendix Q applies to sprinklered buildings. By focusing on the factor that actually drives fire outcomes - reliable sprinkler systems - rather than adding a second stairwell, Salem can achieve equivalent or better life safety outcomes at lower cost.

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2. Prototype Single-Exit Buildings Perform Comparably to Code-Compliant Buildings

The Minnesota study evaluated four building geometries, including both code-compliant two-stairway buildings and prototype single-exit stairway buildings up to eight stories tall - taller than what Appendix Q would allow. The study found that with two straightforward enhancements - smoke detectors in common egress corridors and robust sprinkler inspection, testing and maintenance programs - the prototype single-exit buildings achieved building risk equal to or less than code-compliant single-exit buildings already permitted under Minnesota's existing code.

Appendix Q's four-story limit is more conservative than what the Minnesota study evaluated, meaning the safety case for Salem's proposed adoption is even stronger.

3. Modern Multifamily Buildings Are Already Very Safe

The Minnesota data revealed that multifamily residential buildings built after the year 2000 have a fire fatality rate approximately six times lower than single-family homes. In Minnesota, 98.8% of multifamily fire events from 2004–2024 resulted in no civilian fatalities. Every multi-fatality fire event in that period occurred in a non-sprinklered building. The data confirms that properly equipped and maintained modern apartment buildings - including those with single-exit stairways - present a very low fire risk to their residents.

4. Egress Modeling Confirms Single-Exit Buildings Perform Well at Low Rise Heights

Fire and egress modeling conducted for the Minnesota study demonstrated that counter-flow - the concern that occupants egressing and firefighters ascending a single stairway simultaneously would create dangerous congestion - is not a significant factor in low-rise buildings. The limited occupant loads in these buildings mean that egress movement times are well within safe parameters. This directly supports Appendix Q's application to buildings of four stories or less.

National Momentum Behind Single-Exit Stairway Reform

Salem would be joining a growing number of jurisdictions that have modernized their codes to allow single-exit stairways in low-rise multifamily buildings. Seattle has permitted single-exit stairway apartment buildings for decades and currently allows them up to six stories. Colorado recently passed legislation requiring municipalities to adopt codes permitting single-exit stairway buildings up to five stories. Portland has also recognized the housing benefits and took action late last year to allow for single-stair four story multifamily buildings under Appendix Q. The International Building Code is actively considering an expansion to allow single-exit stairways up to six stories in a proposed change for its 2027 edition.

These jurisdictions have built track records demonstrating that single-exit stairway apartment buildings can and do operate safely. Adopting Appendix Q places Salem in step with national best practices. Salem should not be left behind when we're all facing the same housing supply pressure.

Concrete Benefits for Salem's Housing Supply

Adoption of Appendix Q would deliver tangible benefits for Salem:

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- Reduced construction costs. The Minnesota study estimated the cost of adding a full second stairway at approximately \$350,000 in a prototype eight-story building. For a four-story Salem building, cost savings would still be substantial - savings that can be passed on to renters or used to finance additional units.
- More usable floor area. Eliminating the second stairwell frees up approximately 200 square feet per floor - space that becomes additional housing units, increasing a project's economic viability and the community's housing supply.
- Better infill development. Single-exit designs are far more compatible with Salem's smaller urban and neighborhood infill lots, enabling housing production on sites that are currently too constrained for two-stairway buildings. This supports Salem's growth management goals and supports infill development priorities.
- Greater design flexibility. Single-exit floor plans allow for more efficient, well-designed apartment layouts, making units more desirable for families of all sizes.

Conclusion

The evidence is clear: single-exit stairway apartment buildings up to four stories, equipped with automatic sprinkler systems and the modest enhancements identified in the Minnesota study, can achieve life safety outcomes equivalent to - and in some respects better than - current code-compliant alternatives. Meanwhile, the housing benefits are significant and immediate.

So our request is simple. Please keep this conversation moving forward with Community Planning & Development staff and with the Fire Department, and work toward a path that adopts OSSC Appendix Q while also pairing it with the kinds of safety enhancements the Minnesota study points to.

Salem needs more housing. Appendix Q is a practical way to unlock more multifamily housing capacity on real sites, in a way that is still grounded in sprinklered construction and can be strengthened even further with common-sense, evidence-based safeguards.

Thank you for your consideration of this important issue, and we would welcome the opportunity to engage in future discussions with Salem's Fire Department and Community Planning & Development Department.

Sincerely,



Mike Erdmann
CEO

cc: David Gerboth, Salem Fire Department
Eunice Kim, Salem Planning Division
Al Rossi, Salem Building Department