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March 18, 2025

Chair Pham, Vice Chair Anderson, and Members of the Senate Committee on Housing and Development,

For the record, my name is Kevin Cronin, and I serve as the Policy and Advocacy Director at Housing Oregon. Housing Oregon is the statewide trade association of over 125 organizations representing mission-driven affordable housing developers, affordable homeownership organizations, and homeless service providers. In short, we are the landlords of Oregon's affordable housing sector. The average rent in a Housing Oregon member unit is affordable to someone making just 37% of the area median income (AMI).

In 2022, Housing Oregon was part of the coalition that crafted and passed Senate Bill 1536, a landmark effort to address the devastating heat deaths of June 2021. We sat at the table with Verde, the Community Alliance of Tenants, the Springfield Eugene Tenant Association, and Multifamily Northwest to negotiate a solution that ensured all units built from 2024 onward would include cooling and that landlords must allow tenants to install air conditioning devices in existing units.

Since then, Housing Oregon members have actively worked to implement that law. I recall a training where 50 resident service workers learned how to help tenants acquire the air conditioning units provided for under SB 1536. We also worked to set up community cooling spaces for residents in buildings where installing window units is difficult—such as tall buildings with sealed windows. Our members care deeply about the well-being of their residents, and we recognize that extreme heat is a public health issue.

**That said, we oppose SB 54 in its current form. It is not ready.** This bill needs more engagement with the affordable housing community before moving forward. I would welcome the opportunity to sit down with Multifamily Northwest, the Community Alliance of Tenants, the Springfield Eugene Tenant Association, the Oregon Law Center, and other stakeholders to find a workable compromise.

At the start of this session, Chair Pham convened excellent informational hearings on the challenges facing affordable housing

finance. One key takeaway was that many of the financial assumptions underpinning affordable housing projects—especially those developed between 2008 and 2017—are no longer viable. The current version of SB 54 would destabilize the financial viability of nearly every affordable housing project in the state.

I appreciate that proponents of the bill have been willing to work with me on an amendment that could address some of our concerns. However, one of our biggest concerns remains the lack of funding to support the transition to permanent cooling. We recognize that exempting affordable housing while allowing for preservation funds to be used could be a partial solution. But the preservation program has been funded at only 25% of its need over the last few legislative sessions, and existing subsidy caps would require changes to make this viable. Simply put: we cannot mandate a transition to permanent cooling without a dedicated funding source.

Insurance is another major concern. Housing Oregon members are already struggling in a crisis-level insurance market. Some sponsors are being forced to self-insure or turn to surplus line carriers. Central City Concern recently saw a 500% increase in its insurance rates. A bill that is too prescriptive in its requirements could further destabilize the market, pushing more Housing Oregon Members into unaffordable coverage—or out of operation entirely.

When I reviewed my notes from 2022, I saw that we had discussed the need for a dedicated funding source for cooling retrofits. Unfortunately, SB 54 does not build on that work. Any meaningful transition to a "cooling era" must come with a funding strategy to support it.

For these reasons, I must regretfully oppose SB 54 on behalf of our members. There is too much uncertainty, too much risk, and too little financial support to make this work. However, we remain committed to negotiating in good faith with our tenant advocate partners. I sincerely hope that we can return in the short session with a bill that protects vulnerable residents while maintaining the financial viability of affordable housing.

Thank you for your time and consideration. I am happy to continue this conversation and can be reached at [kevin@housingoregon.org](mailto:kevin@housingoregon.org) or 971-347-8503.

Sincerely,  
Kevin Cronin  
Policy & Advocacy Director  
Housing Oregon