



ucssusa.org Two Brattle Square, Cambridge, MA 02138-3780 **t** 617.547.5552 **f** 617.864.9405
1825 K Street NW, Suite 800, Washington, DC 20006-1232 **t** 202.223.6133 **f** 202.223.6162
500 12th Street, Suite 340, Oakland, CA 94607-4087 **t** 510.843.1872 **f** 510.843.3785
One North LaSalle Street, Suite 1904, Chicago, IL 60602-4064 **t** 312.578.1750 **f** 312.578.1751

February 10, 2022

Chair Jama, Vice-Chair Anderson, and Members of the Committee:

Thank you for the opportunity to provide testimony in opposition to Senate Bill 1537. My name is Akash Singh and I am writing on behalf of the Union of Concerned Scientists, an organization dedicated to the use of sound science in public policy. UCS is proud to be supported by more than 10,000 Oregonians, including over 500 professionals who are a part of our Science Network.

SB 1537 is an anti-regulation proposal that would make it more difficult for state agencies to enact new regulations or rules to improve the lives and environments of Oregonians. It adds onerous and costly requirements that serve to make agency rulemaking and compliance prohibitively expensive, complicated, and inefficient. SB 1537 also has a potentially catastrophic effect on agency abilities to take needed action to address climate change, public health, energy efficiency, wildfire prevention, reduction of energy burdens, and public safety.

One of the primary reasons SB 1537 is onerous and inefficient is that it ignores the cost assessments that are already built into agency rulemaking. (For example, the Building Codes Division regularly assesses the cost impact of any new code advancements.) While SB 1537 is presented as an attempt to protect low-income Oregonians from displacement, it was not crafted in collaboration with low-income advocates.

As an organization who values using science in crafting agency rulemaking to protect the public interest, we are concerned with SB 1537's ability to make collaborative agency rulemaking significantly more expensive and complicated.

I urge the Committee to oppose SB 1537 and protect collaborative Oregon agency rulemaking.

Sincerely,

Akash Singh, JD
Western States Policy Advocate
Union of Concerned Scientists