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February 5, 2022

Sen. Kayse Jama, Chair and Committee Members  
Senate Committee on Housing and Development  
State Capitol  
Salem, OR 97301

Re: SB 1537 (Impact Statement)

Dear Chair Jama and Committee Members:

Thank you for the opportunity to provide testimony in **opposition to SB 1537**. 1000 Friends of Oregon is a nonprofit, membership organization that works with Oregonians to support livable urban and rural communities; protect family farms, forests and natural areas; and provide transportation and housing choice.

SB 1537 requires that a “housing cost impact statement ... be prepared upon the proposal for adoption or repeal of any rule or any amendment to an existing rule by” named agencies. The bill expands the state agencies to which it applies, and it also adds complex and nebulous assessments that must be made. This housing statement applies to single family homes, looks only at short term costs to individual houses, requires hard to assess evaluations, does not take into account benefits to either the resident or to the community at large from the proposed regulation, and does not look at long term benefits.

HB 1537 appears to be an attempt to undermine policies that the legislature set and directed agencies to implement. Among other things, it could undermine parts of the comprehensive wildfire bill that passed last session (SB 762). Those provisions are designed to make more Oregonians safe and the state more resilient in the face of wildfire: adoption by the Oregon State Fire Marshal of defensible space standards, implementation by the Building Codes division of wildfire resilient building codes, and other bill provisions. The agencies directed to do this work by SB 762 are on the verge of adoption and implementation, *as directed by the Legislature*. We should let these take effect and then see the costs (if any) and the benefits.

We urge you to not proceed with SB 1537. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Mary Kyle McCurdy".

Deputy Director