

February 6, 2022

Senator Jama, Chair
Senate Committee on Housing and Development
Oregon State Capitol
Salem, OR 97301

RE: SB 1537—OPPOSE

Chair Jama and members of the Committee,

The undersigned 15 organizations strongly oppose SB 1537 and urge the Committee members to vote no.

While we support the goal of preventing the displacement of low-income communities which this legislation purports to address, SB 1537 is not the way to do this. This legislation has not been adequately vetted or developed and we fear it may result in a myriad of harmful, unintended consequences. We are not aware of any collaboration or discussion of the proposed legislation with impacted stakeholders (e.g., low-income housing advocates, land use advocates, racial justice advocates, etc.). That should be a first step before any legislation of this expansive consequence is considered.

We oppose the substance of this bill for a variety of reasons. As a baseline, the stated purpose of the bill is wholly unnecessary. Cost assessments are already built into agency rulemaking processes. For example, the Building Codes Division regularly assesses the cost impact of any new code advancements. This bill puts a new, burdensome, and ill-defined layer onto that work.

SB 1537 is also a significant change to existing law that would have very real impacts on the ability of agencies, lawmakers and local communities to advance critical regulations that improve lives and livelihoods, including regulations related to climate action, public health, energy efficiency, wildfire prevention, reduction of energy burdens, and safety.

SB 1537 expands what must be included in a housing cost impact statement, adding complex and nebulous assessments that must be made for a regulation to be upheld. These new statements now must be applied to actions by many additional state agencies. Ultimately, the bill's burdensome requirements could make agency rulemaking and compliance prohibitively expensive and complicated.

In many ways, the significant consequence of this bill could be setting a near-impossible bar for any new regulation (or amendments to existing regulation) to ever be adopted by the twelve named state agencies.

We strongly urge you to vote no on SB 1537.

Sincerely,

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Program Director
Community Energy Project

Jeff Bissonnette
NW Energy Coalition

Allie Rosenbluth
Campaigns Director
Rogue Climate

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