



Senate Committee on Housing and Development

RE: Support for Senate Bill 54

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

Located in Portland, Oregon, Central City Concern (CCC) provides a comprehensive continuum of affordable housing options integrated with direct social services, including health care, recovery, and employment. In 2024, CCC served 15,991 people experiencing or at risk of homelessness by providing affordable and supportive housing, integrated health services, addiction recovery, and employment assistance.

CCC strongly supports the intent of SB 52, which recognizes the urgent need for providing cooling solutions to residents of multiunit buildings in the face of increasingly frequent and severe heat events. Ensuring residents have adequate cooling is essential for protecting public health, especially for vulnerable populations, including individuals recovering from health conditions, seniors, and those experiencing socioeconomic barriers.

However, CCC urges thoughtful consideration of the challenges and unintended consequences presented by this bill as currently drafted. Several buildings in our portfolio, particularly older unreinforced masonry (URM) structures, lack sufficient electrical capacity or code-compliant wiring to support the required air conditioning units in each apartment. Addressing this would require extensive electrical upgrades that could trigger mandatory full seismic retrofits. These retrofits would necessitate temporary relocation of residents and millions of dollars in capital investment—costs currently beyond the financial capacity of many affordable housing providers.

CCC strongly recommends that the bill include provisions for dedicated funding to assist landlords in implementing necessary cooling upgrades. Additionally, we suggest amending the seismic code requirements to explicitly exempt electrical upgrades and cooling installations from automatically triggering full seismic retrofits. Such amendments would allow affordable housing providers to realistically and sustainably comply with the law without compromising resident stability or organizational viability.

We appreciate the committee's efforts to address climate resiliency in our housing stock and welcome continued collaboration on pragmatic solutions.

Thank you for considering our feedback.

Respectfully,  
Rachel Maas  
Director of Climate Action, Central City Concern