

February 8, 2024

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

Re: SB 1537 – Oppose unless amended

Chair Jama and Members of the Committee,

I completely share your goal of solving the housing crisis, and there is much to like in SB 1537, such as: Establishment of a Housing Accountability and Production Office; Funding (\$500M) that can make a difference; Infrastructure and climate-smart incentives funding for affordable housing within existing Urban Growth Boundaries (UGBs); Focus on building in walkable, livable, affordable communities;

However, I am opposed to this bill unless three parts of it are amended for the better:

- **Specify significant funding to go specifically to low income housing** affordable to those making less than 80% AMI, for which there is the greatest need and the greatest underproduction*.
 - Oregon DLCD Regional Housing Needs Analysis, pg 12, shows that all of the units that will or are likely to require public support are in the low income-- under 80% AMI-- range.
 - The simple “or” between low or moderate income housing in many sections of the act could result in little or no new housing for people making less than 80% of area median income. The Oregon DLCD Regional Housing Needs Analysis, pg 12 shows that all of the units that will or are likely to require public support are in the low income– under 80% AMI– range.

Median Family Income	New units for each of the following...				
	Projected Need	Underproduction	Housing for the Homeless	Total Units	% of Units
120%	201,656	7,725	-	209,381	36%
80-120%	82,796	18,326	-	101,121	17%
50-80%	70,013	30,574	875	101,462	17%
30-50%	44,400	26,119	2,334	72,852	12%
0-30%	44,701	28,076	25,965	98,742	17%
Oregon	443,566	110,819	29,174	583,559	100%
% of Units	76%	19%	5%	100%	

29% of units will require public support

An additional 17% is likely to require public support

- In no case should the “affordability” boundary be raised to 130% of AMI as it is currently in Section 55.

- **Reduce the number of exemptions from land use regulations** developers can receive without negotiation.
 - These nearly automatic exemptions limit the ability of cities to negotiate for increased affordable housing, increased number of units, and livability.
- **Remove the provisions that broadly expand Urban Growth Boundaries.**
 - Building outside the UGB strains infrastructure funding and could lead to fewer, not more units being built. There are many lots that could be repurposed inside the UGB much more affordably..
 - Expanding the UGBs implies more miles driven by cars and trucks, which has negative public health and climate impacts.
 - The additional lengths of infrastructure have their own additional construction emissions as well as losses in sequestered soil and plant/forest carbon.
 - The dollar and environmental impacts of housing materials themselves are significant. New development outside the urban growth boundary both uses more new materials and tends to produce larger homes than new units inside the urban growth boundary.

Oregon's DEQ report on the Impacts of Housing Materials tells us that prioritizing converting existing buildings (such as vacant office space) to residential, and incentivizing smaller and multi-family units could cut the embodied carbon emissions of construction by well over 60%:

OPPORTUNITIES TO REDUCE EMBODIED CARBON EMISSIONS		
Reuse existing buildings	Build smaller	Optimize building materials
Incentivize and support the conversion of vacant office space to residential.	Reduce size of housing by incentivizing smaller units, multifamily, more units per lot.  20-40% embodied carbon emissions reduction potential. ⁶	Set embodied carbon limits for materials and buildings; incentivize manufacturers to reduce embodied carbon.
-40-75% Embodied carbon emission reduction potential per building through reuse of the structure of an existing building. ⁵	Aligns with House Bill 2984, 2023	-20-60% Recommendations by Resilient Efficient Building Task Force. ⁷

<https://www.oregon.gov/deq/mm/Documents/housingbriefs.pdf> page 3

Please amend the bill in ways that supports housing and livability now and in the future..

Thank you for the opportunity to express my interest in seeing an improved SB 1537, that really helps us solve the housing crisis.

Helena Birecki,
Neskowin, OR resident and Climate Reality Project member