



To: Senate Committee on Housing and Development

From: Julia DeGraw, Oregon Conservation Network, and Oregon League of Conservation Voters

Date: 2/6/2022

**RE: OPPOSITION to SB 1537**

Chair Jama, and Vice Chair Anderson and Members of the Senate Housing and Development Committee:

Thank you for the opportunity to provide input on SB 1537. On behalf of our thousands of members and supporters in Oregon, we would like to register the Oregon Conservation Network and Oregon League of Conservation Voters' **opposition to SB 1537**, a poorly vetted bill that we fear will make it harder to pass important housing policies in the future that could benefit Oregonians from across the state.

The Oregon Conservation Network (OCN) is coordinated through the Oregon League of Conservation Voters (OLCV). OCN is a coalition of 37 not-for-profit organizations throughout the state, united to advocate for pro-conservation legislation and to fight policies that threaten our state's natural legacy. OCN is powered by tens of thousands of Oregonians who belong to their membership organizations. We work to promote policies that will ensure a better Oregon for our children – and to fight policies that do not.

While we at OCN and OLCV 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,

A handwritten signature in black ink that reads "Julia B. DeGraw".

Julia B. DeGraw

Coalition Director

Oregon Conservation Network, and Oregon League of Conservation Voters

Testimony Submitted On behalf of all the OCN Member Organizations:

1000 Friends of Oregon, Association of Oregon Recyclers, Audubon Society of Portland, Beyond Toxics, Cascadia Wildlands, Center for Biological Diversity, Center for Food Safety, Central Oregon LandWatch, Climate Solutions, Defenders of Wildlife, Engineers for a Sustainable Future, The Environmental Center, Environment Oregon, Friends of Mount Hood, Friends of the Columbia Gorge, Greater Hells Canyon Council, League of Women Voters of Oregon, Native Fish Society, Neighbors for Clean Air, Oceana, Oregon Coast Alliance, Oregon Environmental Council, Oregon Land and Water Alliance, Oregon League of Conservation Voters, Oregon Natural Desert Association, Oregon Physicians for Social Responsibility, Oregon Shores Conservation Coalition, Oregon Wild, Pew Charitable Trusts, Renewable Northwest, Rogue Riverkeeper, Sierra Club Oregon Chapter, The Street Trust, Surfrider Foundation, Trout Unlimited, Tualatin Riverkeepers, WaterWatch of Oregon, Wild Salmon Center