



**MULTIFAMILY NW**  
The Association Promoting Quality Rental Housing

Oregon Senate Committee on Housing and Development  
900 Court St. NE  
Salem Oregon 97301

**RE: Opposition to SB 54**

March 11, 2025

Chair Pham, Vice Chair Anderson, Members of the Committee,

On behalf of Multifamily NW, thank you for the opportunity to provide comment on SB 54 and how it would impact Oregon's rental housing market.

Multifamily NW is the largest association of housing providers in the state, representing nearly 300,000 units and every profession related to the industry — from property managers and owners to landscapers, maintenance professionals and screening companies. Our top priority is to collaborate with public sector leaders to identify and implement proven solutions to Oregon's ongoing housing crisis.

While we acknowledge the importance of ensuring the health and safety of tenants, we believe that this bill unfairly burdens housing providers with significant, unnecessary costs and regulatory requirements. The requirements included in it impose a financial strain on housing providers and will certainly exacerbate the very affordability challenges the bill seeks to address.

This bill mandates that housing providers ensure in-unit or nearby access to cooling systems by 2026, with a requirement to install costly cooling equipment in all residential properties, including multi-unit buildings with 10 or more units, by 2036. This proposal unfairly burdens housing providers, particularly those with limited financial resources, by requiring them to invest in expensive infrastructure without sufficient long-term support from the state or financial assistance to offset the costs.

Based on the experience of our members, installing cooling equipment in each unit is a prohibitively expensive undertaking. The cost for installing such systems could be up to \$15,000 per unit, a significant financial burden that housing providers must bear. For multi-unit buildings, these costs multiply quickly, raising expenses that will inevitably be passed on to tenants in the form of higher rents. In an already competitive housing market, where affordability is a growing concern, such increases will only further exacerbate the affordability crisis for Oregonians.

Additionally, the requirement for quarterly maintenance and servicing of the cooling systems further increases operational costs. For some buildings, this could become a significant and ongoing expense that may outstrip the available resources of housing providers, particularly those managing smaller properties. Even for vacant units, providers would be required to bear the costs of maintenance and operation, further driving up expenses across the board.

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Beyond the financial impact, the mandate to install cooling systems also raises concerns about the environmental consequences. Excessive use of air conditioning is a known driver of rising emissions, contributing to climate change. The additional burden on the state's power grid, already stretched thin by existing demand, could exacerbate these concerns. With rising energy costs and the increasing frequency of extreme weather events, this mandate could place significant stress on both housing providers and the energy infrastructure, leading to higher utility rates.

Instead of imposing burdensome and costly mandates on housing providers, we encourage the legislature to focus on policies that incentivize energy-efficient upgrades through grants, rebates, and tax credits. This would provide the necessary support for housing providers to make the investments in cooling systems, while minimizing the financial strain on tenants and preventing an increase in rents.

We respectfully request that the committee reconsider the provisions of SB 54, as it could have detrimental impacts on housing affordability, the financial viability of housing providers, and environmental sustainability. Rather than creating mandates that impose undue costs, we urge lawmakers to pursue collaborative solutions that address both the housing affordability crisis and the need for cooling in a way that is equitable and sustainable for all Oregonians.

Thank you for your time and consideration.

Sincerely,

Zach Lindahl  
Director of Government Affairs