



March 17, 2025

Senator Khanh Pham, Chair
Senate Committee On Housing and Development
900 Court Se. NE
Salem, OR 97301

RE: City of Eugene Opposes SB 6

While the City of Eugene supports efforts to streamline housing development permitting, SB 6 is overly broad in definition of what types of building permits would need to meet a 45 day 'shot clock', it is pre-emptive of local authority, and it levies unreasonable financial penalties against local governments. Additionally, the bill allocates no financial resources to support local governments with implementing a new performance standard. For these reasons, the City of Eugene opposes SB 6 as introduced.

In addition to the policy challenges present in this bill, there are a number of critical logistical/implementation details missing from the bill, these include:

- What constitutes a "complete" application? This is undefined and not a term used in conjunction with a building permit review.
- Defining the types of building permits that a 'shot clock' would be applied to.
- Address the existing timelines currently ORS 455.467.
- What is the coordination with the new Housing Accountability and Production Office?
- How does a 45 day 'shot clock' account for coordinated review with other utility (some public, some private) providers?
- 45 days seems arbitrary, what data and studies were utilized to set this date?

SB 6, as drafted, would apply to all building permits, which in Eugene could range from an awning to bathroom addition to a 12-story apartment building to the new UO Football Facility. These take wildly different timeframes for review due to levels complexity. SB 6 would result in increased overall timelines to obtain required permits. In Eugene, as in many other jurisdictions, review for compliance with local code regulations happens concurrently with review for state building code compliance. To meet the time constraints and other limitations in the SB 6, review and approval of local code provisions would need to happen before acceptance of a "complete" building permit application, significantly lengthening the overall process.

SB 6 would result in higher permit fees. The bill does not relax any construction standards, reduce any of the complexity of plan review and permitting work, or relieve any responsibility on the part of a municipality or a building official to verify compliance with adopted codes and regulations prior to issuing a permit. Therefore, ensuring performance under SB 6 would require additional staff, paid for by increased permit fees.

SB 6 would create uncertainty regarding applicable regulations and increase design costs. A project is vested in the building codes, adopted fee schedules, and other regulations in effect at the



time of permit application. If there are needed iterations of plan review(s) and response(s) to gain approval, the applicable codes, fees, etc. do not change through the process.

Under SB 6, after acceptance of an application the permit must be either issued or denied with 45 days. If denied, for a project to move forward a new application would need to be submitted, and the 45-day performance requirement would start again. In that case the project would be subject to any changes that occurred in adopted codes, regulations, or fees, which could necessitate costly redesign.

Section 1(2)(c) is highly problematic, and we question its legality. If it were in effect, there would be the potential scenario where a city would have to refund fees, pay the applicant's design costs (with no apparent limit), issue the permit anyway, and perform all the inspections (for free).

Lastly, if there are some local governments who are struggling to issue permits in a timely manner, it would be better to offer them resources to increase staff capacity, or have HAPO assist them in finding a solution, rather than provide a blanket state-wide approach to solving the problem. For the reasons provided above, the City of Eugene asks that you vote No on SB 6 as introduced.

Respectfully,

//submitted electronically//

Ethan Nelson, Intergovernmental Relations Manager