

**From:** [Trees for Life Oregon](#)  
**To:** [Commissioner Rubio](#); [Council Clerk – Testimony](#)  
**Cc:** [shade-equity@googlegroups.com](mailto:shade-equity@googlegroups.com)  
**Subject:** Written testimony for CC's Oct. 19 public hearing on the PCEF proposal  
**Date:** Saturday, October 1, 2022 3:37:08 PM  
**Attachments:** [Letter to CC on PCEF changes for Oct. 19 public hearing.docx](#)

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Dear Commissioner Rubio:

Attached is our letter of support for your proposed PCEF changes, with a few caveats, as stated. We deeply appreciate your acknowledgement of the urgency of the climate crisis and the key role that trees play in addressing it, especially for vulnerable residents.

Kyna Rubin

Trees for Life Oregon



October 1, 2022

Dear Commissioner Rubio and City Council:

We thank Commissioner Rubio for recognizing the urgency of the climate crisis and proposing action through a more strategic PCEF to help address it. We're especially supportive of prioritizing spending on tree-related climate action and of eliminating funding allocation limits for different areas. And we support keeping the community grants program intact.

We like the proposed PCEF framework because we strongly believe it is long past time to get serious about aligning Portland's tree-relevant programs, codes, bureaus, and bureau practices with the City's stated climate and equity goals. The lives of current and future generations of Portlanders depend on City leaders doing this.

But much, much more work will be needed. City leaders will need the political will to think big about a) how to preserve the existing large shade trees that combat lethal heat island effects, and b) how to preserve space in new development to plant new ones. Thinking big means breaking from the status quo by being open to creative, alternative ways of truly treasuring big trees through revised designs and codes. And thinking big means the City must undertake a street tree maintenance program to improve street tree condition and longevity, reduce community resistance to planting street trees, and eliminate the current disproportionate financial burdens of street tree maintenance on lower income Portlanders. The PCEF proposal would not supplant the need to take all of these steps.

Though we support the proposed PCEF framework, the devil, of course, is in the details. Some of those details will be imbedded in the upcoming revised PCEP code language. Importantly, we ask that these code changes establish both the intent and requirement for robust community engagement in developing the Climate Investment Plans. And we ask the City to provide a sufficiently long (two-week) public comment period on the proposed PCEF code language changes ahead of the October 19 City Council public hearing on them. This will allow the public time to read the language changes and comment on them.

Sincerely yours,

Kyna Rubin, [Trees for Life Oregon](#)

Cc: [cctestimony@portlandoregon.gov](mailto:cctestimony@portlandoregon.gov); Shade-Equity Coalition

**From:** [Tyler Gilmore](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Proposed changes to PCEF structure testimony  
**Date:** Thursday, October 13, 2022 11:23:27 AM  
**Attachments:** [Letter of Support for PCEF Changes - Google Docs.pdf](#)

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Hi there,

I am submitting this written comment (attached as PDF) for the 10/19/22 city council meeting since I will not be able to attend in person.

Thank you,

Tyler  
he/him/his  
Forest Defense Team Co-Lead

To whom it may concern,

I wanted to write to express my support of Commissioner Rubio's proposal to restructure PCEF funding use to support efficient energies, affordable multi-family housing, continued community grants, and *especially* street tree planting and maintenance. Not much of what I say here will be news to the Commissioners and PCEF committee, but I want to affirm that Portland has a racist history of redlining and under-funding neighborhoods that are predominantly inhabited by BIPOC and low-income communities. We have neglected our neighbors. And while this plan will not change the *causes* of these racist, classist policies and practices in our city, it may change the *effects* that are threatening the health and well-being of our BIPOC and low-income communities during the well documented heat islands happening in our city. As we expect extreme weather events to only worsen as the climate crisis continues, we owe it to our community to keep people safe. Trees are no longer a luxury, but are a life-saving necessity.

According to OPB

(<https://www.opb.org/article/2022/06/27/portland-remembers-people-died-heat-dome-one-year-ago/#:~:text=The%20county's%20report%20says%2069,48%20people%20lived%20alone.>), Multnomah county was deeply affected by the heat wave in 2021 and we can only expect that this will continue unless we do something to intervene in our tree canopy *now*.

"In a typical year, there are around 95 deaths from all causes in the last week of June," Haggerty said. "But last year there were 186, nearly double the average of the previous three years."

During that week, there were 257 emergency department and urgent care visits for heat illness, according to the report. In a typical year, there are 83.

The county's report says 69 people died during the week of deadly heat, and a total of 72 people died from heat-related illness that summer.

Funding tree maintenance would also ensure that the cost of urban tree canopy growth would not fall onto those most vulnerable, who may also struggle financially and find that cost could be prohibitive in accessing these life saving trees.

Thank you for your proposal. I support it and I look forward to seeing it through to action.

Tyler Gilmore (he/him)

Team Co-Lead

Forest Defense Team, 350PDX

[tyler@350pdx.org](mailto:tyler@350pdx.org)

**From:** [Brenna Bell](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Proposed changes to PCEF structure testimony  
**Date:** Thursday, October 13, 2022 12:45:21 PM  
**Attachments:** [Changes PCEF-Suport of Urban tree equity.pdf](#)

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Please see attached!

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**Brenna Bell** (she/her)  
Forest Climate Manager, [350PDX](#)  
[brenna@350pdx.org](mailto:brenna@350pdx.org)

“Even a wounded world is feeding us. Even a wounded world holds us, giving us moments of wonder and joy. I choose joy over despair. Not because I have my head in the sand, but because joy is what the earth gives me daily and I must return the gift.”

— **Robin Wall Kimmerer**, [Braiding Sweetgrass: Indigenous Wisdom, Scientific Knowledge and the Teachings of Plants](#)



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Portland, OR 97227  
503-281-1485  
350PDX.org

To: Portland City Council  
From: 350 PDX Forest Defense Team  
[cctestimony@portlandoregon.gov](mailto:cctestimony@portlandoregon.gov)

October 13, 2022

**RE: Changes to PCEF; Support of Urban tree equity**

The Forest Defense Team of 350PDX advocates for improving shade equity in the City of Portland. We support Commissioner Rubio's proposal to fund tree planting and tree maintenance in the Portland low-income neighborhoods utilizing Portland Clean Energy Community Benefits Fund (PCEF) funding.

- Portland Clean Energy Funds must first and foremost be managed by, and go to the support of, the communities that PCEF was enacted to empower. Any changes to the PCEF code necessarily must reflect this mandate and not shift funds from the hands of the public into city government without utmost transparency and accountability.
- 350PDX has supports Commissioner Rubio's proposed changes to the Portland Clean Energy Community Benefits Fund (PCEF) to expand the funding areas and broaden the scope of eligible recipients to include City Departments, with the caveat that we want clear assurances that community based organizations would remain in charge of implementing the much-needed climate solutions. As PCEF is a community-based program, community based organizations must continue to be the primary locus of decision-making and implementation. We believe funding should go to city bureaus so they are able to provide support and expertise - but not control.
- We support the development of a five-year plan to address strategic programs, as recommended by Commissioner Rubio. We ask that the PCEF committee is responsible for developing and renewing this plan, not city staff or elected officials.
- We generally support the suggested strategic programs, and especially endorse the Tree Canopy growth and maintenance program, which is anticipated to provide \$40 million for Portlan's urban trees over the next five years. We believe that the city taking financial responsibility for the tree maintenance in low-income neighborhoods is crucial for successfully eliminating Portland's inequitable tree canopy. That said - *funding* tree maintenance does not equate to



the city *providing* tree maintenance. It is essential that community based organizations with a proven track record of equitable community engagement are the drivers of this new program.

- PCEF funding for street tree maintenance in low-income, low tree canopy neighborhoods is an appropriate use of these community funds. While we hope that the city eventually values all trees as public infrastructure and provides for their care, PCEF funds should not be used for funding street tree maintenance in wealthier neighborhoods.
- We ask that the PCEF funds be additive to the funds already designated by the City for tree planting in Portland: \$3 million/2 years in the 2022 budget, about 6000 trees.
- Commissioner Rubio's Plan to focus on tree planting in the neighborhoods with low tree canopy, with more dense populations of people of color, immigrants and refugees, is consistent with the report *Growing a more equitable urban forest*<sup>1</sup>, prepared by Portland Parks and Recreation in December 2018, with consultants and a community advisory committee. This is a thoughtful, comprehensive report, and we are disappointed that in the intervening years so little has been done to implement it. The time is now, and this is a positive step in the right direction.
- The first 5-year plan should include mechanisms to increase tree canopy on rental property; recommended in the Equitable Urban Forest report. This will be an important component of equitable tree canopy in Portland.
- *Urban Forest Management Plan*<sup>2</sup> is overdue for a 10-year update. We especially wish to see the "review of canopy goals and tree planting targets" be included in the update as recommended by the *Growing a more equitable urban forest* report.
- The *Climate Action Plan of 2015*<sup>3</sup> for the City of Portland and Multnomah County includes a goal of increasing the tree canopy from 30.7% to 33.3% by 2035. We need a plan with annual targets for reaching this goal.
- There are other sources of funding for planting trees in the urban setting. Research if any of these funding sources can be utilized for maintenance of street trees, but if so likely could be used to address any backlog of tree maintenance, but all are short-term funding sources. Potential funding sources:
  - 1) Metro Nature in Neighborhoods capital grant program. The City and school districts are potential applicants; plantings must be on public property. Funded by the 2019 Metro Parks bond; \$40 million.
  - 2) The Oregon Department of Forestry has an Urban and Community Forestry Program. It is unclear if it has grant funding for expanding the urban forests in the state.



3) The Inflation Reduction Act will provide \$1.5 billion nationwide for planting urban forests over ten years. This will be a grant program which Portland may be able to tap.

- The proposed code changes, in Section 7.07.060, B3 states that 20% of funding should go to non-profit organizations that address priority populations. Given the addition of funding recipients expanding to City departments and contracts to for-profit companies, we request you change the code to ensure that 60% of funding be reserved for non-profits representing the priority populations.
- Unrelated to the tree canopy, in Section 7.07.030, Section G on Energy efficiency, energy storage is listed as one program area. We would like this to be modified to energy storage in association with renewable energy production.

In summary, The Forest Defense Team of 350PDX is very pleased to see the proposal of \$40 million to address Portland's tree canopy inequity and maintenance of street trees in the priority neighborhoods. This is a good step toward the city assuming the full burden of maintaining street trees as a part of the public infrastructure. However, we strongly request that there are more assurances in the new code that centering community decision-making for all PCEF-derived funds, as this is a crucial equity issue.

Sincerely,

Brenna Bell,  
*350PDX Forest Climate Manager*

Darlene Chirman,  
*350PDX Forest Defense Team and  
Great Old Broads for Wilderness Cascade-Volcanoes Chapter volunteer*

Scott Killops,  
*350PDX Forest Defense Team volunteer*

<sup>1</sup> *Growing a more equitable urban forest: Portland's citywide tree planting strategy.* Portland Parks & Recreation. December 2018

<sup>2</sup> *Urban Forest Management Plan.* Portland Parks & Recreation. 2004

<sup>3</sup> *Climate Action Plan.* Bureau of Planning and Sustainability. 2015

<sup>4</sup> *Tree Canopy Monitoring: Protocol and Monitoring from 2000-2015.* Portland Parks & Recreation. 2017

**From:** [Michaela McCormick](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Testimony to City Council on PCEF  
**Date:** Friday, October 14, 2022 10:55:11 AM

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Hello,

I want to offer my testimony for the Oct. 19 City Council meeting on the proposed changes to the Portland Clean Energy Community Benefits Fund. I urge the Council to maintain community, as opposed to City bureau, oversight of PCEF. Furthermore, I urge the City Council to retain the intent of the PCEF initiative by assuring that community-led initiatives be allocated a minimum of \$60 million annually as a floor for grant funded programs and be allocated 25% of all revenue collected from the fees, whichever is larger.

Respectfully,  
Michaela McCormick  
Member, Extinction Rebellion PDX

**From:** [Jessica Zahnow](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** 10/19/22 Council Agenda - 873 PCEF Fund  
**Date:** Friday, October 14, 2022 5:13:36 PM

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Among the changes being proposed to the City Code Chapter 7.07 is a proposal to more than double the administrative cap on the program.

I respectfully submit this testimony to ask the Council to not adopt this administrative cap amendment language, specifically the changes to the existing Chapter 7.07.040 (C) - sub (E) in the proposed amendment, which increase the administrative cap from 5% to 12% per year. **This is inconsistent with the measure, as passed, by Portland voters and is disingenuous to those who passed this measure with the assurance the program administration would be fiscally reasonable.**

As the Council finds in its proposal, the work needed to be done and the urgency around that work is critical to Portlanders. And the funds should be directed, to the greatest extent possible, to the actual projects making the change versus allocating such a large percentage to administration salaries, expenses, and overhead.

As explained in the issue brief, the expected proceeds collected from this tax on Portland businesses, and on Portlanders purchasing items at these retailers, has increased from \$40,000,000-\$61,000,000 to more than \$90,000,000. So even if the cap remained at 5%, the increase in revenue already results in a 50% increase, or \$1.5mn/year increase, of the administrative budget - from ~\$3mn/year to \$4.5mn/year. Furthermore, the cap excludes any annual audit costs.

I do not object to the language amending the calculation of the percent cap based on the three prior years revenue. This amendment is reasonable and ensures the program administrators can smooth out year-to-year variability in Fund revenues for a dependable budget.

Thank you for considering my testimony. It's a lot of work to do my full time job and stay engaged in civic activities. It's unfortunate that the public often feels that while they can officially speak, it's a token procedural gesture, and that the decisions are baked ahead of time without real consideration of the public comment. You have such an important job and a privilege as our public officials. I hope you listen thoughtfully to our voices.

Jessica Zahnow

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Jessica Zahnow  
p: (718) 974 1718  
e: [jessica.zahnow@gmail.com](mailto:jessica.zahnow@gmail.com)

**From:** [Terry Parker](#)  
**To:** [Council Clerk – Testimony](#); [Wheeler, Mayor](#); [Commissioner Mapps](#); [Ryan, Dan](#); [Commissioner Rubio](#); [Commissioner Hardesty](#); [City Auditor, Mary Hull Caballero](#)  
**Subject:** Testimony to the City Council on agenda item 873, Amend Portland Clean Energy Community Benefits Code, 2:00pm Time Certain October 19, 2022.  
**Date:** Saturday, October 15, 2022 1:47:47 PM

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To the members of the Portland City Council,

Predictably as delivered in testimony during the public hearings for both HB2001 and RIP; the price of single family homes and housing in general has significantly increased with a large part of the higher price tag due to increased land values in residential neighborhoods and speculators buying up many of the most affordable homes likely taking into account future redevelopment opportunities. With lot line to lot line refill development allowed, residential streets have become full time parking lots and tree canopies are disappearing.

An example of the disappearing tree canopy can be found on East Burnside near 102nd. What was once three oversize lots with one home on each is now a big lot line to lot line hole in the ground with redevelopment taking place. The former tree canopy is apparent on the Google Map image below.



With the proposal on the table to provide \$40 million from the Clean Energy Fund to greatly expand Portland's tree canopy, taxpayers are unduly on the hook to replace the trees developers cut down. This should be a cost paid for by the developers, not taxpayers. RIP needs to be modified to provide for more open space to preserve mature trees. It is however appropriate to use Clean Energy Funds to restore and add trees in Portland Parks, on the city owned public golf courses and other city owned properties.

As for the \$100 Million proposed for transportation decarbonization projects, the dollars ought not to be used to replace full traffic lanes with bicycle and bus only lanes. The majority of these types of projects create more traffic congestion which in turn creates more fuel consumption and carbon emissions. A prime example is on NE Couch Street leading to the Burnside Bridge where the removal of one of two full service traffic lanes has been replaced with a bus only lane thereby creating added congestion and emissions nearly all day long.



Additionally traffic congestion in Portland is increasing because PBOT continues to waste tax dollars making streets and major thoroughfares into an obstacle course for drivers. The current bias leadership at PBOT needs to be replaced in that they only listen to special interest groups such as the bicycling community, The Street Trust and transit riders etc. while turning a deaf ear and showing little respect to the taxpaying motorists that actually fund the roads and create family wage jobs. In a recent conversation with a popular brand name new car dealer, I was told the payroll for just the service department at the dealership is over six million dollars a year. The technicians make a hundred thousand or more a year. It is clear that motor vehicle usage keeps the economy humming forward. History clearly demonstrates higher rates of personal mobility (such as driving) significantly contributes to greater economic productivity which in turn generates family wage jobs. More than 10% of the jobs in Oregon are tied to the auto industry.

To establish equity, adult bicyclists need to be directly taxed to fund the privileged infrastructure they utilize. Likewise, through the fare system, public transit needs to become more financially self-sustainable which includes the maintenance and funding of specialized transit only infrastructure including bus only lanes on public streets. If \$100 million from the Clean Energy Fund is to be utilized for transportation decarbonization projects; it needs to be utilized to create residential off-street parking for multi-family developments and charging capacity for electric vehicles in all residential parking lots. Chargers need to include a consumption payment system for the electricity drawn, a grid upgrade fee and a road tax equitable with the gas tax. The wiring of single family homes where needed for charger connectivity could also be part of the decarbonization menu; and again RIP needs to be modified to require adequate off street parking with electric vehicle charging connectivity for all new residential development.

Respectably submitted,

Terry Parker  
Portland

**From:** [annie](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Clean Energy Funds  
**Date:** Saturday, October 15, 2022 8:23:20 PM

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The first round of PCEF funding might not have been as smooth as we wanted, but the program is now running well. The city should not try to swoop in and take control of the program or misappropriate the funds that the public VOTED for clean energy projects that serve the BIPOC community.

This fund is supposed to be managed by the community and the city should not change that. The money is supposed to go to community-led programs.

While on the surface many of the priorities in Commissioner Rubio's plan are things i support, such as putting \$40 million into developing an equitable tree canopy and housing and transportation goals, there is an underlying problem with the City Council setting a precedent of determining how PCEF funds should be spent.

CEF must not become a piggy-bank to backfill funding of other city projects, particularly given the upcoming elections and the tendency of the Council to be in the pocket of the business community. We urge the City Council to retain the intent of the PCEF initiative. Don't force white supremacist ideas or process on the oversight board. Don't elevate white supremacist priority over BIPOC structure. Everything doesn't have to be done the way the city does things (especially considering that the city often does things poorly).

Honor the will of the voters. Respect the decision-making of the community. Respect the process of the BIPOC community.

annie capestany

97202



**From:** [Landoe, Brian](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** UFC Statement on Council Item #873  
**Date:** Monday, October 17, 2022 4:11:34 PM  
**Attachments:** [UFC Statement on PCEF Code Changes October 2022.pdf](#)

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Good Afternoon - Please accept the Urban Forestry Commission's statement on Council Item #873: Amend Portland Clean Energy Community Benefits Code to better align with and equitably meet City climate action goals.

**Brian Landoe** (*He/Him/His*) [Why do I list my pronouns?](#)

Analyst III | Urban Forestry

503-504-0836 (cell)

Monday – Friday, 7:00 am – 3:30 pm

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October 17, 2022

Portland City Council  
1221 SW Fourth Ave.  
Portland, OR 97204

Dear Mayor Wheeler and City Commissioners:

The City's Urban Forestry Commission commends Commissioner Carmen Rubio and Bureau of Planning and Sustainability staff for their leadership and efforts to update and expand the Portland Clean Energy Fund program (PCEF). To help address the climate crisis we are facing and to continue to empower community capacity-building and participation, this program must be designed and implemented as efficiently and effectively as possible and remain true to PCEF original goals and priorities.

We applaud the recognition of trees and green infrastructure as critical components of the PCEF program. The Urban Forestry Commission has a long-standing interest in this strategic initiative.

Dedicated funding for tree planting and maintenance is essential if we are to equitably prepare our city for a clean energy future, a core goal and identified need of PCEF. The proposed \$40 million dollar funding for tree canopy growth and maintenance demonstrates that the City is serious about addressing this need. This will provide great opportunities for community capacity building and the fostering of relationships and partnerships among community members and organizations. It is important to take into consideration and align this effort with concurrent urban forestry initiatives and associated funding, such the \$150 million to be directed to Oregon in support of urban forestry programs via the Inflation Reduction Act.

The Urban Forestry Commission supports the proposal to develop five-year Climate Investment Plans that would guide portions of the PCEF's community grant program and strategic direction. Again, we look forward to collaborating with the broader community in a robust and transparent public engagement process to co-create aspects of the Climate Investment Plans relating to tree planting and maintenance.

The City of Portland must take financial responsibility for maintaining Portland's Street Trees, treating these assets as critical infrastructure and remove the financial burden of maintaining these assets from adjacent property owners. This is essential to remove economic barriers for low-income Portlanders to street tree maintenance, to ensure an equitable and climate resilient urban forest for all. The PCEF proposal would not supplant the need for a long-term Street Tree asset management program

**Urban Forestry Commission**

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**PORTLANDPARKS.ORG**  
Commissioner Carmen Rubio  
Director Adena Long



(currently under consideration as part of Portland Parks and Recreation's Sustainable Futures project). The PCEF tree canopy growth and maintenance CIP proposal should instead serve as a pilot program, including investing in training and workforce development, building community capacity, and developing and piloting various programmatic approaches. These pilots should focus on under resourced communities and include proactive community-led outreach and education, while also addressing conditions that exist in distinct parts of the city (e.g., streets with small trees and streets with large trees).

We recognize that some of the proposed code changes are necessary to handle the increasing demands of administering a growing fund. It is important that the code support the building of additional capacity to support an effective tree planting and maintenance program, including program coordination and procurement, and access to trained arborists and heavy equipment to maintain large trees.

Community empowerment and engagement must remain at the heart of PCEF. If funds are to be allocated to public agencies and private businesses, the intent and criteria should be clearly defined in the rule and further defined in the Climate Investment Plans. The community should have an integral role in creating and carrying out the process, design, and implementation.

The Urban Forestry Commission noted the proposed increase of the cap on administration costs from 5% to 12%. This is a significant amount of money. For transparency purposes, please provide information explaining the need for an increase of this magnitude. Regardless of the cap size, care should be taken to manage administrative costs, recognizing that additional funds are needed for community outreach and mechanisms to channel PCEF funds efficiently and expeditiously.

We also support amending the PCEF code to allow the creation of a permanent Green Infrastructure Maintenance Fund. This proposal recognizes the need for a programmatic approach to maintaining these critical infrastructure assets and will provide more consistency, predictability, transparency in implementation. We look forward to learning about and participating in the establishment of this important revenue management tool.

Thank you again for your efforts and we look forward to continued collaboration.

Sincerely,



Vivek Shandas

Urban Forestry Commission Chair



**From:** [M.W](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** proposed changes to PCEF structure testimony  
**Date:** Monday, October 17, 2022 6:53:31 PM

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I am in support of Commissioner Rubio's proposal to fund tree planting and tree maintenance in the Portland low-income neighborhoods utilizing Portland Clean Energy Community Benefits Fund (PCEF) funding.

As you are well aware, last year's heat emergency and this past summer's heat waves had disproportionate impacts on lower-income neighborhoods compared with higher-income neighborhoods. One major reason for this is the difference in the size of the tree canopies between lower- and higher-income neighborhoods. Lower-income neighborhoods in Portland, as has been documented by the City of Portland and by Vivek Shandas of PSU, have fewer shade trees and thus higher temperatures during heat waves than higher-income neighborhoods in Portland. v]The presence or lack of tree shade has a significant impact on the temperature in the immediate area. Lower-income neighborhoods in Portland, have fewer shade trees than higher-income neighborhoods, which results in their being significantly hotter during heat waves. Lower-income areas in Portland have a disproportionate BIPOC populations, which means that BIPOC Portlanders are being disproportionately impacted. This is inequitable, and it is time the City of Portland addresses this inequity effectively.

Commissioner Rubio's Plan prioritizes tree planting in neighborhoods with low tree canopy and significant populations of people of color, immigrants and refugees. This aligns with *Growing a more equitable urban forest*, the report prepared by Portland Parks and Recreation in December 2018. It has been 4 years since that report was completed, and very little has been done up to now to implement it. After two summers in a row of extreme heat, it is past time for implementation. Taking on responsibility for planting more trees in the neighborhoods that most need them is a meaningful first step.

The City has already designated some funds for tree planting. I strongly urge you to use the requested PCEF funds in addition to - and not as a substitute for - those funds. In addition, given the purpose and mission of PCEF, it is imperative that community based organizations continue to be the primary locus of decision-making and implementation, including decisions around funds designated for tree planting. PCEF funding should go to city bureaus so they are able to provide support and expertise to these community based organizations - not so that the bureaus take over decision making.

Mary Watkins  
SE Portland

**From:** [Rathfelder, Amy](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** NW Natural Written Testimony--Council Item #873  
**Date:** Tuesday, October 18, 2022 2:02:50 PM  
**Attachments:** [NWN\\_PCEF\\_Oct22.pdf](#)

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**Good afternoon,**

**On behalf of NW Natural, please see the attached document for our written comments on Portland City Council Agenda Item #873. Please do not hesitate to let me know if there are any questions or outstanding needs.**

**Sincerely,  
Amy Rathfelder**

[Amy Rathfelder](#)  
NW Natural – Community and Government Affairs, Multnomah County  
503.367.9554 | [nwnatural.com](http://nwnatural.com)  
she/her/hers

See our [Environmental, Social and Governance Report](#)

The Honorable Mayor Ted Wheeler  
Commissioner-in-Charge Carmen Rubio  
Commissioner Jo Ann Hardesty  
Commissioner Mingus Mapps  
Commissioner Dan Ryan

October 18, 2022

Re: NW Natural Comments on the City of Portland and Bureau of Planning and Sustainability  
Proposed Updates to the Portland Clean Energy Fund

Mayor Wheeler and Commissioners Rubio, Hardesty, Mapps, and Ryan,

We appreciate the opportunity to provide comments on the City of Portland's proposed updates to the Portland Clean Energy Fund ("PCEF"), and value the time and energy on the part of the Bureau of Planning and Sustainability and the oversight commissioner's office in creating these new guidelines. NW Natural believes that addressing climate change is urgent and complex. Climate change is an issue that requires quick and thoughtful action and involvement by all of us. We support strategies that prioritize large-scale decarbonization, while safe-guarding resiliency, reliability, and affordability for Portland residents.

As one of the oldest companies in Oregon, NW Natural has innovated and evolved over many years and multiple generations, most recently evidenced in our [Vision 2050: Destination Zero](#) report and our ongoing [Less We Can](#) initiative. We have expressed our continued desire to work with the City of Portland as a partner in reaching our collective climate goals, showcasing new and emerging technologies, growing green jobs and contributing to a circular economy. **Today, we express our support for the proposed reforms to the Portland Clean Energy Fund. We believe that if they are adopted, these changes will help PCEF become a more effective and functional source of funding for projects that will support the City of Portland and its partners in reaching shared climate objectives.**

As such, Commissioner Rubio has proposed reforms to PCEF, with the aim of expanding the grant's reach and enabling "bigger, bolder, and faster investments by the Portland Clean Energy Fund, while ensuring the program operates with unparalleled accountability, responsibility, and transparency." Specifically, NW Natural would like to offer its support for the following recommended changes:

- **Code changes that would broaden the scope of eligible funding recipients:** More specifically, expanding the funding scope for projects within the City of Portland to include grants and contracts, allowing government entities, for-profit businesses, and workforce entities to be eligible for awards and additionally allowing for organizations outside the City to develop these projects.



- **Development of strategic 5-year investment plans to increase the program's accountability:** More specifically, the requirement that these climate investment plans ("CIP") are subject to approval by the Portland City Council and will include measurable goals for funding allocations.
- **Addressing specific recommendations outlined by the PCEF audit:** These include the proposed changes that address the accountability, scope, and strategic direction of the program.

**In reviewing the proposed reforms, NW Natural has outstanding clarifying questions we hope PCEF administrators, members of the Council, and/or the oversight commissioner's office can answer in the spirit of partnership:**

- How do the newly adopted DEQ rules at the state level factor into the development of the CIPs? What sources (jurisdictional climate action plans, etc.) are the PCEF committee members planning to draw from in prioritizing potential investment allocations in these CIPs?
- On the proposed "strategic program #2," which centers around increasing efficiency on renewable energy upgrades in new and redeveloped regulated affordable multifamily housing: What partnership opportunities are committee members planning to engage (utilities, developers, etc.)?
- What will community stakeholder processes look like for the development of the initial 5-year CIP?

We appreciate the expansion of the Portland Clean Energy Fund to incorporate programs that will enable funds to be used to further the work on the Portland Clean Industry Hub, as this will allow the community to have the opportunity to participate in larger scale green energy infrastructure. We are hopeful that Council's adoption of these changes will prompt a program that is more inclusive and supportive of a wider variety of climate-friendly projects within the City of Portland. We ask that the Council and the PCEF committee members consider us a partner in this work and provide answers to the above questions, as well as conduct meaningful and constructive stakeholder engagement with private and public interests in crafting new strategic direction for PCEF and in helping to determine future funding allocations. We look forward to working with each public entity and facet of this program on the many opportunities to do and support climate work in this region while ensuring our most vulnerable populations are protected.

Sincerely,



Amy Rathfelder

NW Natural Government and Community Affairs Manager, Multnomah County

**From:** [holisticcooke@aol.com](mailto:holisticcooke@aol.com)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Improvements to PCEF Structure  
**Date:** Tuesday, October 18, 2022 7:07:11 PM

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To: [cctestimony@portlandoregon.gov](mailto:cctestimony@portlandoregon.gov)  
Subject: Improvements to PCEF Structure

Dear Commissioners,

We are thrilled with the much-needed and long-overdue investment in tree-canopy expansion. We are writing in regards to the implementation of this climate resilience strategy.

We encourage you to continue to empower local communities to be responsible for managing the bulk of the funds, such that the original values of PCEF are maintained. Specifically we support the following:

- 1) Use the CIP-writing process as a way to rebuild trust between community and City. For Equitable power-sharing community orgs must be essential members of the CIP writing process. The process must be transparent, inclusive, and community groups' input and power must be on par with city entities.
- 2) Work with the **Urban Forestry Commission** on all projects and programs. They have a proven wealth of expertise and information, and a vital role in integrating their work with PCEF's CIP writing process.
- 3) We need PBOT, BES, and Parks at the table - we need agreement among bureaus on equity neighborhoods. This is the time to leverage all skills and coordinate in a seamless manner.
- 4) We need to do all we can to ensure existing trees survive in low-canopy neighborhoods. Given the uncertain rainfall season, extend funding for dry-season establishment watering from 3 to 5 years.
- 5) This is a capital investment that needs a capital maintenance plan. This is real infrastructure that needs ongoing attention – and we have local communities that can do that with funding and organizational support.
- 6) We urge the City Council to retain the intent of the PCEF initiative by assuring that community-led initiatives be allocated a minimum of \$60 million annually as a floor for grant funded programs and be allocated 25% of all revenue collected from the fees, whichever is larger. The PCEF ballot initiative was never meant to backfill city bureau budgets.
- 7) We need detailed information on the community oversight plan to ensure close fidelity to equity and workforce outcomes for priority communities by bureaus and other PCEF recipients.
- 8) This will only be successful if there is sufficient budget allocation for PCEF staff to oversee the process and work of Fund recipients. For example, it may be necessary for more than one staff member to oversee canopy expansion and green infrastructure to be sure the canopy strategic investment remains true to the original intent of PCEF. *(The proposal is to raise staffing cap from 5%-12% so they have more capacity to work closely with other city bureau staff & community)*
- 9) If the PCEF staff oversight role remains strong, its community-focused mission has the potential to improve equity practice in bureaus that are lagging on [inclusive contracting](#). See [auditor's report on equity in construction contracting](#)
- 10) Community members are capable and ready to play a core role in tree planting and maintenance, both as volunteers and in entry-level workforce training positions. Parks Urban Forestry has not demonstrated that it is in philosophical alignment with the community-led, community empowerment intent of PCEF. Consequently, public-private relationships have been badly eroded and there is a general lack of confidence that Parks Urban Forestry can administer funds in alignment with the spirit and mission of PCEF.

Thank you for this opportunity to support this testimony,  
Harriet Cooke, Elianne Lieberman, Michael Heumann, Adele Thompson, Karen Boyer, Steve Katz  
on behalf of the Havurah Shalom Climate Action Team



**From:** [A.Shapiro](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Urban trees and PCEF  
**Date:** Wednesday, October 19, 2022 8:46:14 AM

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I appreciate the acknowledgement of the need to plant more urban trees and allocating funds to do so. However, the mission of PCEF, which won a vast majority of votes from Portlanders, was that this fund be run by citizens, not the city government. Citizen involvement and control of these funds is essential. I urge you to keep control of the funds with the PCEF board.

Regards,  
Alice Shapiro  
Portland, OR 97201

**From:** [Chris Dodge](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** PCEF Testimony  
**Date:** Wednesday, October 19, 2022 8:54:54 AM

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To whom it may concern,

I am writing to request that the PCEF add disabled people as a priority population in a climate crisis. The disability community has historically been left behind to perish in climate-related disasters and are considerably more vulnerable to such things as wildfire smoke, power outages, etc. The truth is disabled people are weary and tired of being omitted or overlooked as a priority despite facing some of the worst consequences of climate change and having the least amount of access to emergency services. It's time for the City to recognize this and ensure programs like this are inclusive and intersectional. Please correct this oversight and add disabled people as a frontline community in a climate crisis.

Thank you for your time and thoughtful consideration.

~Chris Dodge

**From:** [Victoria Paykar](#)  
**To:** [Council Clerk – Testimony](#)  
**Cc:** [Meredith Connolly](#)  
**Subject:** Proposed changes to PCEF structure testimony  
**Date:** Wednesday, October 19, 2022 9:21:28 AM  
**Attachments:** [ClimateSolutions\\_PCEF\\_Support\\_Testimony.pdf](#)

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Good Morning,

My name is Victoria Paykar, and I am the Oregon Transportation Policy Manager at Climate Solutions. I have attached my written testimony in support go the proposed changes to the PCEF structure.

Thank you,

Victoria (Vee) Paykar (she/her) | Oregon Transportation Policy Manager  
[Climate Solutions](#) – Accelerating Clean Energy Solutions to the Climate Crisis  
direct:360-352-8663 | c: 360-584-6067  
[ClimateCast](#) | [Facebook](#) | [Twitter](#)  
[About us](#) and [our values](#)

**Upcoming events:**

[Register now](#) for an event at the Royal Room in South Seattle honoring Climate Solutions with live music by *The Royal We* on **Sunday, Oct 30**. COVID protocols shared on registration site.

[Register now](#) for Hope, Health, and Climate: an online event series on **Thursday, Dec 8 & Friday, Dec 9** featuring Dr. Leah Stokes, Dr. Vin Gupta, Dr. Howard Frumkin and Rebecca Solnit.





19 October 2022

Mayor Wheeler and City of Portland Commissioners  
Portland City Hall  
1221 SW 4th Avenue  
Portland, OR 97204

**Re: PCEF Proposed Changes - SUPPORT**

Mayor Wheeler and City of Portland Commissioners,

Climate Solutions writes in strong support to the proposed amendments to the Portland Clean Energy Community Benefits Code to better align with and equitably meet the City's climate action goals. Climate Solutions is a regional non-profit working to accelerate clean energy solutions to the climate crisis.

Oregonians across the state are suffering from climate-exacerbated extreme weather events and poor air quality. Last summer, more than 70 Multnomah county residents tragically died due to the climate change-fueled heat dome and a lack of safe housing and other basic protections. This year, dozens more have died or become seriously ill due to extreme heat. As you know, BIPOC, low-income and other frontline communities have been and currently are disproportionately affected by climate change impacts yet are the communities least responsible for contributing to climate change. The climate emergency is upon us, and we have to urgently do all we can to both mitigate greenhouse gas emissions and build more resilient communities. We offer the following comments in support of the PCEF proposed changes.

Climate Solutions supports the creation of a five-year climate investment plan to guide PCEF's investments in community-responsive grants as well as new strategic investments in climate action projects that align with meeting the City's climate action goals and that support environmental justice and environmental, social, and economic benefits for all Portlanders.

Transportation and the built environment are two of the largest sources of greenhouse gas emissions in the City of Portland, as well as fundamental components of a livable and affordable city for all residents. Building PCEF programs aimed at these two sectors in particular and focusing on populations that are underserved and underinvested in represent key opportunities to meet the City's climate goals and deliver equitable outcomes. These programs can help ensure that PCEF's investments are also directly reducing energy and transportation cost burdens on those with the lowest incomes and supporting increased access to opportunities.

For these reasons, we strongly support PCEF's focus on providing life-saving heating and cooling for our most vulnerable neighbors in the form of efficient heat pumps and other related clean energy technologies, as well as energy efficiency retrofits that keep people more



comfortable in their homes and apartments and lower their utility bills. We also strongly support PCEF's new focus on critical investments needed to decarbonize our transportation system. In addition to zero emission vehicle projects, we are very supportive of the inclusion of projects that displace single car trips. By providing affordable and more accessible ways to get around, these projects will not only displace the use of climate change-causing fossil fuels but also improve our air quality and quality of life by building more resilient and connected communities.

As communities most impacted by problems are the closest to the solutions, we urge for continued community engagement and community-led processes that shape PCEF's strategic initiative design, climate investment plan development and investment decisions and ensure that priority populations are the main beneficiaries of PCEF investments. True to the original vision and model of PCEF, we look forward to seeing investments in projects that build capacity, improve the lives of priority populations through economic upward mobility, improve public health for those most disproportionately impacted by pollution, and improve livability for all while helping the City meet its greenhouse gas emissions goals.

We are grateful for the hard work done by Commissioner Rubio and the PCEF staff and volunteers for keeping the community-led vision of PCEF alive and ensuring that Portland residents will prosper from the transformative power of PCEF investments.

Thank you for the consideration of our comments,

A handwritten signature in black ink, appearing to read "V Paykar".

Victoria Paykar  
Oregon Transportation Policy Manager  
Climate Solutions

**From:** [Megan Van de Mark](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Public comment on proposed PCEF code amendments  
**Date:** Wednesday, October 19, 2022 9:26:25 AM

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Dear Mayor Wheeler and City Commissioners,

Thank you for providing the opportunity to share public testimony on the City's efforts to update and expand the Portland Clean Energy Fund (PCEF). I am thankful for the City's leadership on this and want to comment on two items.

### **1. Inclusion of the disability community as a priority PCEF population**

As each of you know well, our community is in a climate crisis. If we're to effectively address this crisis, our approach must center and empower frontline community members to lead in implementing the solution. Unfortunately, the disability community is consistently overlooked as a frontline community in the climate crisis. That oversight has persisted in PCEF. Although the disability community is acknowledged as an underemployed population in PCEF, Section C under findings fails to acknowledge that disabled people are also a frontline community facing some of the most deadly impacts of climate change. **The definition of “priority population” within PCEF must be amended to include the disability community alongside other frontline groups.**

Disabled community members are among the most severely affected in an emergency, including in climate emergencies, which we're facing more and more as a City and region. Disabled people are often among those least able to have access to emergency support during a climate emergency and sustain disproportionately higher rates of mortality. Disabled people face extreme hazards in a climate disaster, including increased barriers to evacuation; power outages that take away use of mobility devices, life saving devices, or elevators; wildfire smoke that worsens respiratory conditions; a lack of ADA compliant housing for displaced disabled people; and communications that often don't include the blind or deaf community.

### **2. Prioritization of tree planting and maintenance within PCEF**

I support the City's proposed plan to recognize tree planting and maintenance as a PCEF Climate Investment Plan (CIP) strategic initiative. To ensure an equitable clean energy future for our city necessitates that we dedicate significant funding to tree planting and maintenance. The proposed \$40 million in funding for tree canopy growth and maintenance will help provide critical opportunities for community engagement and capacity building around tree planting and maintenance. To ensure that this change upholds the original intent of PCEF, it will be essential that the development and implementation of this CIP occurs through an intentional, transparent community engagement process which engages frontline community members and community organizations.

The City does not always have a successful track record in partnering with community members and community organizations. Recent news coverage around interbureau conflict related to City-funded tree planting has highlighted this. We **MUST** focus on genuinely working together and engaging all parties in the process of creating an equitable urban forest for all community members.

Thank you for your consideration.

Best,  
Megan Van de Mark  
North Portland resident

**From:** [Mark Darienzo](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** PCEF revisions  
**Date:** Wednesday, October 19, 2022 12:55:46 PM

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Dear City Council

I don't have a problem with the revisions as long as the original intent (helping low income people and communities of color) is not compromised. Green workforce development and contractor support (including apprenticeships and wages that are 180% of the minimum wage) and the surcharge from sales from the largest retailers must remain intact. If revenues decrease don't penalize the original intent by significantly reducing the funds that go toward it.

Thank you

Mark Darienzo  
6923 NE Morris St  
Portland OR 97213  
503-891-6635



**From:** [Jonathan Wrobel](#)  
**To:** [Council Clerk – Testimony](#)  
**Cc:** [william@nwecb.com](mailto:william@nwecb.com)  
**Subject:** Proposed changes to PCEF structure testimony  
**Date:** Wednesday, October 19, 2022 1:07:18 PM  
**Attachments:** [PCEF Comment.docx](#)

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Dear City Counsel,

We would like to submit these comments for consideration in the proposed PCEF structure.

Thank you,

***Jonathan Wrobel***

Portland Home Energy Score

[homeenergyscoreportland.com](http://homeenergyscoreportland.com)

(503) 567-5551

CCB# 214875

DOE HES# OR-PDX-0006



*Reducing Energy = Saving \$\$\$ = Increased Comfort = Saving the Planet!*



My name is William Castrillón, I, along with Jonathan Wrobel, are principal owners of [Northwest Energy Collaborative](#). We are a local green building verification and consulting firm located in North Portland. Our company provides consulting services to developers, builders, architects, and homeowners on the most effective methods to improve the energy and water efficiency, along with how best to improve indoor air quality and occupant comfort. We specialize in energy efficiency improvement consulting on low income housing, and the verification process of green certification programs for low income properties.

Our mission is to promote healthy, efficient, and durable housing throughout the PNW region, and we accomplish that mission through providing our green building services and with our expanding network of highly skilled contractor partners. Our [Trusted Partners](#) are other for-profit entities, a few are COBID certified, and together we close the loop on many of the energy improvements these older Portland metro homes require. From installing heat-pumps, renovating attic and crawl spaces, sealing ductwork, and properly weatherizing homes, our partners have made countless energy improvements to the aging housing stock in Portland.

We are glad to see that the PCEF program is getting a new direction and has been audited by Commissioner Rubio. Since being limited from the funding until now, we are very excited to be able to help meet the original intent of the PCEF program. I am reaching out to provide a testimony comment in regards to the PCEF program and new direction.

### **The Earth Advantage Problem**

[The Oregon Housing Development](#) and the [Portland Housing Authority](#) lists Earth Advantage Certification as one of the three options of required third party green building certification programs to qualify for the low-income housing tax credit program. Currently the Portland non-profit Earth Advantage holds a complete monopoly over the verification and consulting services required to attain an Earth Advantage Multi-family Building Green certification.

Unlike all other prominent green building certification programs around the country, like LEED, National Green Building Standard (NGBS), EarthCraft, ENERGY STAR, HERS rater, WELL Certified, etc. – the Earth Advantage Building Certification does not act like a true third-party program. In any other typical green building certification program, third party verifiers work with the certification program administrator entity, and with the guidance and requirements from the administrator, the third party verifier submits required documentation and verification field reports for building certification. Here in Portland, Earth Advantage both administers and verifies their own programs, not allowing third party green building verification companies to provide their certification program.

### **Why is this a problem?**

As mentioned, [The Oregon Housing Development](#) and the [Portland Housing Authority](#) lists Earth Advantage Certification as one of the three options of required third party green building certification programs to qualify for the low-income tax credit program (LIHTC). So, if any low income housing developer wants to pursue the LIHTC program, then they must choose and achieve one of the following green certification programs:

- Earth Advantage Multi-family Certification
- LEED for Homes
- Enterprise Green Communities

Of the three certification options, Earth Advantage Multifamily Certification is by far the most popular and most dominant green certification in the Portland and Oregon housing market for new

construction low income multi-family housing. As developers go through the eco-charrette design process, they often do not choose LEED for Homes due to excess soft costs and inflexible point requirements associated with this certification program. Additionally, while the third party program of Enterprise Green Communities has recently been added as another option, the Earth Advantage Certification is still the most dominant and well known certification option by developers and builders in the Pacific Northwest region.

**So – since the Earth Advantage Program is the most popular option, but it isn't a true third party program, all third party verification companies or non-profit entities are locked out of all of the potential consulting services, energy modeling, on site inspections, and building performance testing associated with the Earth Advantage Certification.**

***Issues with current policy:***

1. Limits the diversity of for-profit and nonprofit verification entities to have the ability to perform green building verification services in the Oregon and Portland marketplace.
2. Limits the amount of housing that can be completed in the city of Portland. Less certification options limits the Limiting factor of one to the bottle neck and lack of competition that Earth Advantage has created by not allowing third-party verification companies offer their program
3. Earth Advantage is acquiring all of the business from the Low income housing initiatives in portland due to the fact that they do not allow other verification companies to participate in their certification program
4. **PCEF program would be more at risk of being out of compliance due to lack of a true third party verification process.**

**What We Propose**

Our firm would like to offer the Earth Advantage certification, and we are supporters of all of the work the non-profit does for the energy efficiency construction industry in the Portland area, but we do not support the fact that Earth Advantage administers and verifies their own green building program without allowing third party verifiers to offer the Earth Advantage certification. We would like to offer two options for the PCEF Strategic Initiatives requirements on low-income housing on:

1. Require Earth Advantage to actually be a third party program, and allow third party verification companies to offer their green building certification program.

**OR**

2. Include the all of the following green building certification programs to be options for the Low-Income Housing Tax Credits program and PCEF program funds
  - a. LEED For Homes
  - b. National Green Building Standard (NGBS)
  - c. Enterprise Green Communities





**From:** [holisticcooke@aol.com](mailto:holisticcooke@aol.com)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Improvements to PCEF Structure on behalf of SW 350PDX team  
**Date:** Wednesday, October 19, 2022 1:26:25 PM

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To: [cctestimony@portlandoregon.gov](mailto:cctestimony@portlandoregon.gov)  
Subject: Improvements to PCEF Structure  
From: SW 350PDX team

Dear Commissioners,

We are thrilled with the much-needed and long-overdue investment in tree-canopy expansion. We are writing in regards to the implementation of this climate resilience strategy. We encourage you to continue to empower local communities to be responsible for managing the bulk of the funds, such that the original values of PCEF are maintained. Specifically we support the following:

- 1) Use the CIP-writing process as a way to rebuild trust between community and City. For Equitable power-sharing community orgs must be essential members of the CIP writing process. The process must be transparent, inclusive, and community groups' input and power must be on par with city entities.
- 2) Work with the Urban Forestry Commission on all projects and programs. They have a proven wealth of expertise and information, and a vital role in integrating their work with PCEF's CIP writing process.
- 3) We need PBOT, BES, and Parks at the table - we need agreement among bureaus on equity neighborhoods. This is the time to leverage all skills and coordinate in a seamless manner.
- 4) We need to do all we can to ensure existing trees survive in low-canopy neighborhoods. Given the uncertain rainfall season, extend funding for dry-season establishment watering from 3 to 5 years.
- 5) This is a capital investment that needs a capital maintenance plan. This is real infrastructure that needs ongoing attention – and we have local communities that can do that with funding and organizational support.
- 6) We urge the City Council to retain the intent of the PCEF initiative by assuring that community-led initiatives be allocated a minimum of \$60 million annually as a floor for grant funded programs and be allocated 25% of all revenue collected from the fees, whichever is larger. The PCEF ballot initiative was never meant to backfill city bureau budgets.
- 7) We need detailed information on the community oversight plan to ensure close fidelity to equity and workforce outcomes for priority communities by bureaus and other PCEF recipients.
- 8) This will only be successful if there is sufficient budget allocation for PCEF staff to oversee the process and work of Fund recipients. For example, it may be necessary for more than one staff member to oversee canopy expansion and green infrastructure to be sure the canopy strategic investment remains true to the original intent of PCEF. *(The proposal is to raise staffing cap from 5%-12% so they have more capacity to work closely with other city bureau staff & community)*
- 9) If the PCEF staff oversight role remains strong, its community-focused mission has the potential to improve equity practice in bureaus that are lagging on [inclusive contracting](#). See [auditor's report on equity in construction contracting](#)
- 10) Community members are capable and ready to play a core role in tree planting and maintenance, both as volunteers and in entry-level workforce training positions. Parks Urban Forestry has not demonstrated that it is in philosophical alignment with the community-led, community empowerment intent of PCEF. Consequently, public-private relationships have been badly eroded and there is a general lack of confidence that Parks Urban Forestry can administer funds in alignment with the spirit and mission of PCEF.

Thank you for this opportunity to support this testimony,  
Harriet Cooke, Emily Polanshek, Pat Kaczmarek, Anita Mention, Cathy Wyrick, on behalf of the

SW 350PDX team



**From:** [C.N.E. Corbin](#)  
**To:** [Council Clerk – Testimony](#)  
**Cc:** [Megan Horst](#)  
**Subject:** Testimony for PCEF Ordinance Amendments  
**Date:** Thursday, October 20, 2022 9:59:25 AM  
**Attachments:** [PCEF Testimony\\_C.N.E.Corbin\\_2022-10-19.pdf](#)

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Dear Portland City Council, Government Leaders, and Decision Makers,

Attached is my written testimony on agenda item 873- Amend Portland Clean Energy Community Benefits Code to better align with and equitably meet City climate action goals (amend Code Chapter 7.07) (Ordinance). I ask the Council to consider the content of my written testimony and designate the disability community as a priority population within the legislative code of the Portland Clean Energy Community Benefits Fund (PCEF).

Sincerely,  
Dr. C.N.E. Corbin

Dear Portland City Council, Government Leaders, and Decision Makers,

I submit this written testimony to ask the Council to designate the disability community as a priority population within the legislative code of the Portland Clean Energy Community Benefits Fund (PCEF). The disability community includes multiple disability types; physical, cognitive, hearing, vision, and neurodivergent, to name a few. 12.9 percent of Portland adults are living with a disability.<sup>1</sup>

People with disabilities, much like the named priority communities in the PCEF, “have had less access to the benefits of green investments, and at the same time they are more vulnerable to extreme heat, wildfire smoke, vector borne diseases, flooding and other climate-related impacts.”<sup>2</sup> According to the Environmental Protection Agency (EPA) “climate change-related health impacts may affect people with disabilities more than others.”<sup>3</sup> The U.S. Global Change Research Program’s Climate and Health Assessment names persons with disabilities as a population of concern and vulnerable group.<sup>4</sup> During extreme events “that require evacuation, people with disabilities have high risk of both physical and mental health impacts.”<sup>5</sup> This community is also “disproportionately more likely to be left behind in emergency responses and fail to benefit from humanitarian services due to ability range of environmental, physical, and social barriers.”<sup>6</sup>

**The disability community is made “more vulnerable to climate change than the general population because decision makers may not fully consider people with disabilities in their planning.”<sup>7</sup>** The disability community is situated at the crossroads of intersecting marginalized identities, which can magnify their discrimination and invisibilize their oppressions. While people with disabilities can share identities with the PCEF priority populations, low-income residents and people of color, the PCEF does not explicitly recognize them as a frontline community. Absent of the designation as a priority population, the disability community will continue to face old and new environmental and climate injustices if they are not recognized, and their needs are not specifically addressed in the PCEF.

Despite the Americans with Disabilities Act (ADA), people with disabilities have not received the crucial public infrastructures necessary for their day-to-day lives. They have been prevented from exercising their full rights as citizens and residents through the denial of public resources due to social and economic barriers, and accessible infrastructures (*physical barriers*). Universal design and inclusive infrastructure must be woven throughout the PCEF process so that “environments can be accessed, understood, and used to the greatest extent possible by all people regardless of their age, size, ability or disability.”<sup>8</sup> **The ADA language is clear, it “prohibits discrimination on the basis of disability in employment, State and local government, public accommodations, commercial facilities, transportation, and telecommunications.”<sup>9</sup>** A Clean Energy future must be just, especially when facing times of crisis, environmental shocks, and severe weather events when access to public infrastructures can be the difference between life and death.

Thank you,



C.N.E. Corbin, Ph.D.  
Portland Resident & Assistant Professor  
Nohad A. Toulan School of Urban Studies & Planning  
College of Urban & Public Affairs

<sup>1</sup> <https://www.cdc.gov/ncbddd/disabilityandhealth/impacts/oregon.html>

<sup>2</sup> <https://www.portland.gov/bps/cleanenergy/about#toc-about-the-portland-clean-energy-community-benefits-fund-pcef>

<sup>3</sup> [https://www.apha.org/-/media/Files/PDF/topics/climate/EPA\\_disabilities\\_health\\_climate\\_change.ashx](https://www.apha.org/-/media/Files/PDF/topics/climate/EPA_disabilities_health_climate_change.ashx)

<sup>4</sup> <https://health2016.globalchange.gov/>

<sup>5</sup> [https://www.apha.org/-/media/Files/PDF/topics/climate/EPA\\_disabilities\\_health\\_climate\\_change.ashx](https://www.apha.org/-/media/Files/PDF/topics/climate/EPA_disabilities_health_climate_change.ashx)

<sup>6</sup> <https://www.un.org/development/desa/disabilities/news/news/disability-inclusive-humanitarian-action.html>

<sup>7</sup> <https://www.epa.gov/climate-change/climate-change-and-health-people-disabilities#:~:text=Increases%20in%20average%20and%20extreme%20groups%2C%20including%20people%20with%20disabilities.&text=Some%20people%20with%20disabilities%20are,heat%2Drelated%20illness%20and%20death.>

<sup>8</sup> <https://universaldesign.ie/what-is-universal-design/>

<sup>9</sup> [https://www.ada.gov/cguide.htm#:~:text=Americans%20with%20Disabilities%20Act%20\(ADA,to%20the%20United%20States%20Congress.](https://www.ada.gov/cguide.htm#:~:text=Americans%20with%20Disabilities%20Act%20(ADA,to%20the%20United%20States%20Congress.)

**City Council Meeting - Wednesday October 19, 2022 2:00 p.m.**

<b>Agenda No.</b>	<b>First Name</b>	<b>Last Name</b>
873-01	Yashar	Vasef
873-02	Theresa	Huang
873-03	Darlene	Chirman
873-04	Gayle	Palmer
873-05	Bruce	Nelson
873-06	Alyson	Berman
873-07	Mickey	Mouze
873-08	Fern	Wexler
873-09	Diane	Meisenhelter
873-10	Trevor	Attenberg
873-11	Ranfis	Giannettino Villatoro
873-12	Zachary	Lauritzen
873-13	Nora	Apter
873-14	lynn	handlin
873-15	Kat	Davis
873-16	Victoria	Paykar
873-17	Jon	Isaacs
873-18	Jonathan	Wrobel