



**PORTLAND
CLEAN ENERGY
COMMUNITY BENEFITS
FUND**

**Portland Clean Energy Community Benefits Fund (PCEF)
Climate Investment Plan
Preliminary Draft Public Comment**

**Public comment received via email to
cleanenergyfund@portlandoregon.gov**



NATURAL RESOURCES DEFENSE COUNCIL

March 30, 2023

For PCEF CIP Program

From Angus Duncan

Re NRDC Comments on DRAFT 2023 PCEF CIP

First, what's especially right in this 2023 Five Year Plan/Budget PCEF iteration:

- 79% of funds targeted to physical energy/GHG efficiency improvements in homes, businesses, transportation, infrastructure (noting that a modest part of these programs include workforce and contractor development allocations)
- Program now clearly covers clean transportation investments including EVs and E-bikes for neighborhood mobility; public and individual home/business charging infrastructure; supporting use of transit through distribution of Transportation Wallet passes, plus rideshare and taxi credits; electrifying school buses; education and mentoring on use of other-than-auto transportation modes; etc.
- Accountability: measuring success or failure of outcomes based on energy saved and emissions reduced as well as socio-economic metrics.
- Taking up the challenge of helping households in rental units to access clean energy opportunities by committing to work with landlords to make clean energy investments work for them also (e.g., by capital improvements in rental units that upgrade their market value)

Remaining concerns:

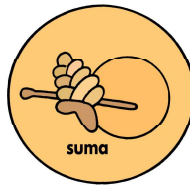
- 1) Heat Pumps: We see much discussion of “deep energy retrofits” and other such generalized interventions. We understand these also include specific and itemized measures, and we would welcome references to these (e.g., insulation; storm windows); and especially to explicit commitments to replacing wasteful and high-emissions resistance heat and gas furnaces/DHW with heat pumps. We are assured that heat pump installations are a core element in these new installation and retrofits. But we would welcome explicit assurances that energy and carbon-efficient heat pumps will figure centrally in home and business retrofits . . . and in targeted public buildings such as schools.

We must add that while incentives such as those made possible from programs such as PCEF and ETO are welcome initial steps, ultimately Portland needs to extricate its buildings from both electric resistance and gas combustion space and water heating. Encouraging residents to make these changes voluntarily and with the benefit of incentives is a useful first step. But both the urgency of climate change and the lessons of energy efficiency accomplishments of the last 40 years remind us that after incentives must come regulatory tools for obliging change where inertia is holding change back. Cleaning our energy system is not a matter of individual choice but a community imperative. Had we started the decarbonizing process 20 or 30 years ago, when the science clearly indicated the need, the change could have been more gradual. Now the ramp is steeper but it must be mounted and completed. So Building codes (e.g., for EV charging outlets) and appliance replacement standards (to displace electric resistance and gas heat) must follow these incentive programs without undue delay.

- 2) Coordination: We note that multiple public and private entities are operating in the energy efficiency and substitute appliances spaces. We acknowledge that coordinating these efforts is not the sole or primary responsibility of PCEF. But special efforts are needed from PCEF, ETO and other public participants to ensure that public funding is targeted efficiently and with the intent of not superimposing—and wasting -- public funding on top of private dollars to the same end (as opposed to complementary incentives). How is PCEF coordinating its work in low-income neighborhoods (EVs, Chargers, Heat Pumps) with other parties active in these spaces (ODOE SB 1536 for HPs; utility programs for HPs, EV's; other public/private sector initiatives)?
- 3) Whole vs. Sum of the Parts: We would welcome more explicit appreciation for interactive outcomes — e.g., where two interventions are aligned to yield more advantages than the simple sum of the parts. These advantages should at least be expressed as energy saved and emissions reduced but may also have socio-economic benefits. Thus valuing treatments of homes and businesses in transit corridors can make occupying these spaces more attractive, resulting in increased densities and improved accessibility to services in those corridors while stimulating ridership for transit and adding value to use of transit passes provided to households. If businesses in these corridors see additional traffic their value to their owners increases, and improved quality of services for households may result as well. There is a virtuous cycle initiated. Other examples may include community solar, ridesharing, etc.
- 4) Tree plantings: While we agree that the extensive new tree plantings in poorly forested areas will benefit the neighborhoods in decades to come with moderated hot days, ambience and property value gains, we caution PCEF to take care with claims that climate gains will result in anything like a timely fashion. New trees provide neither significant shade nor carbon capture for their first 10 to 20 years or so (depending on species). They are growing fast but from a small carbon content “base.” In contrast, emissions savings in the near-term (10 to 20 years) have a disproportionately greater impact on slowing and reversing global emissions, while the same savings in 50 years is

relatively meaningless if earlier warming has not been arrested. The part of Green Infrastructure that involves tending to already matured trees likely will have greater near-term shade and carbon uptake value for the community, although the funding allocation is much smaller than for plantings (\$5mm vs. \$40mm).

- 5) Evaluations and Auditing: We are assured by PCEF staff that there will be consistent program tracking and evaluation for delivering promised outcomes. We don't see the machinery in this proposal for that kind of follow-up to both ensure resources are well and efficiently used. Moreover, program feedback will certainly suggest beneficial modifications to strategies or evaluation criteria; this kind of information should be available consistently and predictably. We are assured separately by PCEF management that there will be consistent auditing for proper accounting and use of funds, a function that's essential to both the effectiveness of the program and its credibility. The CIP would benefit from more specificity with respect to references and assurances of these kinds of checks and balances. We understand these areas will see more detailed treatment in a final CIP, and we will look forward to reviewing that detail when it becomes available.



Dear Portland Clean Energy Fund Staff,

The Coalition of Communities of Color, suma, and Verde appreciate the opportunity to provide feedback on the preliminary draft of the Portland Clean Energy Fund (PCEF) 2023-2028 Climate Investment Plan (CIP). Our organizations and our people came together to shape and pass the original PCEF ballot measure in 2018 and have continued our engagement as the program is implemented.

We are enthusiastic about the strategic programs laid out in the CIP, an unprecedented opportunity to make deep investments into many of the priority areas that matter most to frontline communities in Portland; this is a time to act urgently and meet the scale of the climate crisis. We further support the staff's community engagement efforts and multiple touchpoints undertaken to develop and solicit feedback to the draft CIP.

Our additional, specific feedback falls into four areas:

- Support for the Program Purpose as the overarching value guiding the CIP.
- Support for the Equity + Climate Framework as the evaluation mechanism for strategic program inclusion into the CIP as well as recommendations for tightening alignment between the Program Purpose and the Framework.
- Overarching recommendations for how the Final CIP can demonstrate strategic program alignment with the Framework.
- Design & Accessibility recommendations to ensure that all Portlanders can engage and see themselves reflected in the CIP.

We also encourage you to take the opportunity, in preparing the Final CIP, to create more robust mechanisms for community leadership and accountability within the strategic programs. We believe that with that additional step, the CIP can ensure these bold actions live up to their potential, continuing to foster leadership and create benefits in our communities throughout the lifecycle of the CIP and for generations to come.

Program Purpose. The Program Purpose clearly reflects community leadership and community benefit values: "The CIP aligns with PCEF's guiding principles to prioritize and allocate funding for community-led and informed climate-action projects that benefit Portlanders most impacted by a rapidly changing climate. Climate-action projects funded by PCEF also provide racial, social, and/or economic justice benefits." We strongly support this Purpose as a standalone statement and as the overarching value guiding the CIP.

Equity + Climate Framework. We strongly support the Framework’s function as an evaluation mechanism for the CIP’s strategic programs, it serves as the critical intermediary between the visionary Program Purpose and the details of strategic program design and implementation.

We also see that the Purpose and the Framework could be better aligned because, as currently written, it would be possible for a strategic program to comply with the Framework (by benefiting PCEF’s priority populations) but not comply with the Purpose (by failing to be community-led). This dilution is a point of concern for our organizations; the core of the PCEF model has always been the facilitation of projects and investments that are not just “for” frontline communities, but by us and with us as well. To tighten alignment between the Purpose and the Framework, we propose the following edits to the Framework:

<i>Current Draft</i>	<i>Recommended Changes</i>
<i>“Benefits to frontline communities. Will the program create clear, significant, and measurable benefit to frontline communities?”</i>	<i>“Benefits to frontline communities. Will the program clearly, significantly, and measurably: be led by and accountable to frontline communities, AND create benefits to frontline communities?”</i>
<i>“Climate impact. GHG reductions. Will the program result in meaningful and measurable GHG reductions/sequestration?”</i>	<i>“Climate Impact. Will the program result in meaningful and measurable GHG reductions/sequestration, AND/OR will the program result in meaningful and measurable improvements to climate resiliency?”</i>
<i>“Accountability. Do accountability mechanisms exist to ensure that communities of color, low-income populations, people with disabilities, and other vulnerable communities benefit from the strategic program? Is this program additional to existing or planned efforts?”</i>	<i>“Accountability. Do sufficient accountability mechanisms exist to ensure that the strategic program achieves its intended outcomes with regard to benefits and leadership for communities of color, low-income populations, people with disabilities, and other vulnerable communities? Is this program additional to existing or planned efforts?”</i>

Demonstrating Strategic Program Alignment. The draft CIP requires that a “strategic program concept must answer all four [Framework] prompts affirmatively to be considered for inclusion in the CIP.” Thus, we see each strategic program as an opportunity to clearly articulate how the (revised) Equity + Climate Framework drives that program’s design and implementation and thereby reinforce the connection between the CIP’s Program Purpose and the actual investments that will affect the lives of PCEF’s priority populations and all Portlanders.

We believe this articulation could be stronger and more consistent across the strategic programs. It is clear that a thoughtful analysis of funding allocations, applicant eligibility, and accountability mechanisms has taken place, but the strategic programs do not consistently articulate how each Framework question has been asked and answered in the affirmative or how that evaluation has driven program design. We

believe that providing additional evaluation detail would be an invaluable investment in transparency and public confidence for the CIP and could also serve as the basis for a convenient, high-level dashboard or summary for each program.

We believe that the PCEF team is best positioned to identify how a Framework analysis might be reflected in a given Strategic Program, so we offer the following overarching recommendations for how the Final CIP can demonstrate each Strategic Program's alignment with the Framework:

- Concisely explain how the Program answers all four revised Framework prompts affirmatively
- Justify applicant eligibility (e.g., nonprofit, govt, for-profit) and funding allocation against the revised Framework
- Set expectations/guidance for how eligible applicants can/must comply with the Framework.

Examples could include:

- Capacity building so that frontline nonprofits assume greater roles for Strategic Program implementation over the timeframe of the CIP or in the next CIP.
- Program leadership models that include frontline community members and/or frontline nonprofits.
- Partnership models that encourage cross-sector collaboration (e.g., govt-nonprofit; for profit-nonprofit), particularly between high-capacity applicants and smaller/emerging applicants.
- Clearly preserve and promote the opportunity for grassroots community members to develop their own projects within that Strategic Program.

Design & Accessibility. The CIP is a technical document detailing five years of strategic investments, but it is also a public document that communicates the vision, intention, and value of the program to everyone with a stake in its success. These functions can be challenging to balance against each other, but transparency and accessibility are essential characteristics in meeting this second objective and building public trust in the program. We believe the following design features would better ensure that all Portlanders can engage and see themselves reflected in the CIP:

- A clear, concise executive summary that includes funding allocations, eligibility criteria, and a brief description of how Equity + Climate Framework requirements are satisfied for each strategic program.
- Strategic program page numbers should be listed in the table of contents to facilitate easier navigation.
- Concise, plain language to the greatest extent possible. Where acronyms or jargon must be used, readers should be directed towards a footnote or a glossary defining or expanding on these terms.
- Graphics, illustrations, or other design elements should be included regularly to break up sections and subsections of the CIP and create visual interest for the reader.
- Photos and/or callout boxes to illustrate examples of PCEF projects. Callout boxes are also an opportunity to share narratives of successful PCEF projects that a reader can connect with.

Thank you again for your consideration and your work to create the 2023-28 Climate Investment Plan and to center community voices in that work. We would very much value the chance to meet with the PCEF team, further discuss our support and recommendations, and extend our ongoing partnership to

implement the nation's first climate fund measure created and led by communities on the frontlines of climate change. Please don't hesitate to get in touch.

Sincerely,

Candace Avalos
Executive Director, Verde

Indi Namkoong
Transportation Justice Coordinator, Verde

Alan Hipólito
Executive Director, suma

Taren Evans
Environmental Justice Director, Coalition of Communities of Color

Jenny Lee
Deputy Director, Coalition of Communities of Color

From: Karen Wolfgang <[REDACTED]>
Sent: Sunday, April 2, 2023 3:08 PM
To: Valdez, Jaimes <[REDACTED]>
Cc: Previdelli, Angela <[REDACTED]>
Subject: Re: Upcoming Actions for Community Resilience Hubs (statewide)

Hi Jaimes!

Thanks for the presentation at EPRC last week.

Would you be willing to consider returning to the “resilience hubs” nomenclature, since that is the current term for what is needed (some combo of blue skies + severe weather operations) in most communities? PCEF could definitely specify that it’s just funding capital improvements, and leaving operations to others, but changing the terminology seems like it’s maybe missing the point, and fracturing an effort that might otherwise be unified.

Definitely appreciate your work and am open to more insight about how y’all are approaching this work!!

Thanks,

Karen

April 7, 2023

421 SW Oak St., Suite 300
Portland, OR 97204
1.866.368.7878
energytrust.org

Sam Baraso

Portland Clean Energy Community Benefits Fund
1810 SW 5th Ave, Suite 710
Portland, OR 97201

Re: Comments on Preliminary Draft Climate Investment Plan for 2023-2028

Energy Trust of Oregon appreciates the opportunity to offer comments on the Portland Clean Energy Community Benefits Fund's preliminary draft Climate Investment Plan for 2023-2028. Energy Trust is an independent, non-advocacy, nonprofit organization serving the people, businesses and communities who receive their electricity and natural gas service from Portland General Electric, Pacific Power, NW Natural, Cascade Natural Gas and Avista in Oregon.

The following comments are areas of opportunity we have identified for consideration as PCEF prepares the full draft Climate Investment Plan. We draw from our experience delivering a multitude of clean energy programs for more than 20 years, our understanding of the gaps left or deepened by our approach, and our reflections from working with PCEF grantees the past 3 years and participating in five subject-matter roundtable discussions that helped inform this preliminary draft.

Comments on overall preliminary draft

Overall, the preliminary draft Climate Investment Plan is a strong foundation that was developed through a community engagement model many of us in the industry can learn from. The plan appropriately takes a portfolio approach to distributing funding, including through retaining community responsive grants and establishing new strategic programs.

While further program details and metrics for accountability are expected in the full draft of the Climate Investment Plan, the preliminary draft shows PCEF prioritizing solutions that focus on the barriers and gaps that we know clean energy programs struggle to address, for example:

- Overcoming the owner/renter split incentive in residential and commercial settings
- Serving homeowners experiencing lower incomes
- Finding pathways to deep home retrofits that can help support installing energy efficiency measures as well as addressing deferred maintenance improvements and making homes "solar ready"
- Preserving efficiency and renewable energy investments in multifamily construction and major retrofits so these long-term investments aren't value engineered out of projects
- Preparing in-community gathering places to serve in times of extreme weather events and covering the costs of efficiency and solar+storage investments required to make these safe spaces climate resilient
- Investing in community-based organization capacity building, workforce development and ongoing training and education

- Addressing small business financial hardships, which have been significantly exacerbated by the COVID-19 pandemic, by investing in their business and the buildings they occupy

Comments specific to strategic programs

Strategic Program 1: Clean energy in regulated multifamily affordable housing

Beginning in the early design stage, Energy Trust New Buildings program works with nearly all regulated affordable new construction multifamily buildings in the state. The New Buildings program also has funding to incorporate solar into the building design from the start. Having a clear understanding of the requirements and funding available for these projects through PCEF will allow us to better align incentives and technical assistance to help the design teams and developers to maximize the opportunity this funding provides for energy efficiency and solar.

Areas of strength

- Focus on providing offers supporting new construction projects to ensure energy efficiency and solar measures aren't value engineered out of the project. PCEF funds can provide certainty to developers that will allow them to confidently pursue energy efficiency and solar investments.
- Focusing on new construction separately from existing multifamily buildings and acting quickly to lock in energy efficient construction.

Areas for consideration

- Energy Trust early design assistance can provide incentives to convene project teams to discuss and establish clean energy project goals and objectives early in the process.
- Solar+storage could be a funding opportunity for PCEF.
- Consider portfolio planning for affordable multifamily retrofits with the same housing organizations, potentially building from proposals currently funded by PCEF through RFPs 1 and 2.

Strategic Program 2: Clean energy in unregulated multifamily housing

Areas of strength

- Funding for health and safety is a need in this housing stock and where Energy Trust has had funding limitations.
- Addressing the split incentive present for many multifamily building owners and prioritizing measures with maximum health/safety, greenhouse gas reduction and utility bill savings.

Areas for consideration

- Energy Trust incentives could be leveraged by property owners for their 25% match for PCEF funding to help lower their investment commitment.
- Work with community delivery partners to prioritize buildings with highest energy burdens.
- Monitor the impact of the proposed budget cap of 30% of project costs for health and safety improvements; could provide early year flexibility in the program budget by setting

the 30% health and safety budget for deferred maintenance at the program level rather than the site level.

- Continue to explore ways to work with existing actors and funding to effectively address deferred maintenance.

Strategic Program 3: Clean energy improvements in single family homes

Energy Trust may be able to explore using the categories defined by PCEF to pre-qualify customers for higher incentives or specific Energy Trust program offerings. We can provide incentives, where feasible, with our highest incentives available for customers with low incomes and next level of enhanced incentive for customers with moderate. Assuming solar is a qualifying technology, Energy Trust solar incentives could be paired with these offers and used for a cost match.

Areas of strength

- Three-pronged approach with strategies for renters, homeowners experiencing low income, and homeowners with moderate incomes is an effective way to develop strategies that address specific people's needs and to focus funding on the areas with the highest savings impact.
- Income eligibility reaches 140% AMI, which helps fill a gap where Energy Trust incentives end at 120% AMI. This is an income range that exceeds our current Savings Within Reach income range and is an area where we know increased investment is warranted.
- Rent stability is a key feature to ensuring that investments made to renters are able to be obtained over a long-time horizon. It's notable that PCEF is prioritizing investments made in rental homes and seeking ways to ensure the benefits are realized by the tenant.
- Appreciation for the pursuit of financing and exploring ways to maintain flexibility and to effectively coordinate and create alignment between PCEF, Energy Trust and other funding programs like those included in the Inflation Reduction Act.

Areas for consideration

- Clarifying whether solar and solar+storage are qualifying technologies and which measures qualify as deep energy retrofit versus high impact efficiency or energy upgrades.

Strategic Program 4: Clean energy in small commercial buildings

Areas of strength

- Focuses on both tenants and owners, with energy-efficient appliances fully funded for business owner (or the tenant) and building upgrades partially funded for building owners.
- Covers areas like small commercial heat pumps that Energy Trust's small business offering is not able to support without additional or complementary funding.
- Leaving off a revenue requirement, which can add administrative complexities, participation barriers and may not be a good indicator for all businesses.

Areas for consideration

- Energy Trust incentives could be leveraged by building owners for their 25% match of PCEF funds to help lower their investment commitment.
- The criteria for the space be 20,000 square feet or less may, in some instances, disqualify a business owner or tenant that could be a priority population for PCEF. In our experience, small businesses can occupy spaces up to 35,000 or even 50,000 square feet. Suggest monitoring these criteria over time to adjust as needed.

Strategic Program 5: Building upgrades for community severe weather response

Conversations around resilience hubs that occurred at the roundtable align well with Energy Trust's renewable energy sector focus to support communities with solar+storage microgrids. Energy Trust has incentives and technical assistance that can be leveraged to support customer applications and extend PCEF investment for energy efficiency and solar+storage. Energy Trust may be able to support sites participating in this PCEF program and pre-qualify them for technical assistance or specific complimentary program offerings that support the goals of energy resilience.

Areas of strength

- Supporting communities with funding for technical assistance and solar+storage installation at sites that will become congregating areas for community members during a disaster or severe weather event.
- Including energy-efficient cooling as qualifying equipment.
- The community engagement approach and taking a holistic view of what resilience means to a community.
- Separating schools from this program in order to develop a more focused strategy for schools in the future.

Areas for consideration

- Adding as an outcome measuring the awareness level among community members of where their closest community gathering spots are or the centers that best support their values.
- Further considering the intersections of this strategic program with the Equitable Clean Transportation Access program.
- Further clarifying whether full costs will be covered, or a cost match required.

Strategic Program 10: CBO capacity building program

We are in the second year of providing a small grant offer that helps community-based nonprofit organizations advance ideas, develop projects or deepen their knowledge of energy efficiency and renewable energy, and will be launching in 2023 an approach to convene community-based organizations as a cohort to respond to interest in information and training on energy and Energy Trust programs and services. We would like to align our grant program and CBO cohort plans with PCEF to support as many organizations as possible in Portland or serving Portlanders.

Areas of strength

- Continuing the quarterly mini grants, which are an effective engagement and support pathway for new or small nonprofits.

Areas for consideration

- Consider where we might collaborate on helping community-based organizations navigate and develop their skills and knowledge of clean energy projects, technical assistance and funding.

Thank you for the opportunity to provide our feedback here and as participants of the subject-matter roundtable discussions. We offer these written comments as information for staff to consider as the full draft plan is prepared, and with high interest in continuing and strengthening our positive and collaborative relationship with the PCEF team.

Sincerely,

Alex Novie
Communities and New Initiatives Sector Lead

[REDACTED]

and

Hannah Cruz
Sr. Stakeholder Relations and Policy Manager

[REDACTED]



HOUSE OF REPRESENTATIVES

Letter of Support: Green Banking for PCEF Climate Investment Plan

April 3, 2023

Dear Portland Clean Energy Fund staff and Portland City Commissioners,

As Portland area legislators, we appreciate the opportunity to offer feedback on the draft Climate Investment Plan to guide the Portland Clean Energy Fund investments over the next 5 years. We know that our housing and homelessness crisis, economic challenges and the climate crisis are interconnected. The same communities who lack access to stable housing are hit hardest by the heat waves, ice storms, wildfire smoke and high energy bills that it takes to respond to climate disaster.

Over the next 5-10 years, we know that Portland will face increasing climate disasters, from heat waves to wildfire smoke, to flooding and ice storms. In the face of such challenges, the city needs millions of dollars in financing in order to fund both climate mitigation as well as climate adaptation to the new extreme weather events. In order to finance the projects at the breadth and scale needed, we need to create a **municipal green bank** to expand the availability of capital for these projects.

The federal government's recent Inflation Reduction Act allocates \$20 Billion to be allocated for states and local entities that are creating or already have a green bank. By investing in a municipal green bank, we can leverage potentially tens or hundreds of millions of dollars more from the federal government.

Therefore, we advocate for generous funding of proposed Strategic Program #13 (Access to Fair and Flexible Capital) in the Climate Investment Plan. This program could help stand up a municipal green bank that could issue financing to support projects such as the retrofitting of thousands of Portland houses and apartment buildings, building community solar farms and microgrids for disaster resilience, and supporting climate-friendly businesses and workforce development programs. It could also include supportive financing for equitable, affordable and climate-friendly development, in partnership with other public and non-profit partners.

By sufficiently funding a robust municipal Green Bank, Portland can then leverage millions more in federal funding and scale up the investments we need to reduce greenhouse gas emissions and help our most vulnerable communities in Portland adapt and thrive in the midst of our energy transition.

Sincerely,

Rep. Khanh Pham, HD 46

Sen. Kayse Jama, SD 24

Rep. Thuy Tran, HD 45

From: [Anatta Blackmarr](#)
To: [Clean Energy Fund](#)
Subject: Portland Clean Energy Fund
Date: Thursday, April 6, 2023 2:24:53 PM

Hi, all,

Although I filled out the PCEF survey that will close on April 7, I wanted to submit additional input.

My reason for participating in the survey is to urge officials to support the establishment of a bike/ped electric ferry system—sooner rather than later. I know that a ferry system is on ODOT's long term planning list, but I would like it to have immediate attention and not be relegated to "someday."

One of the crucial aspects of an effective climate plan is public transportation as an alternative to personal car use. Biking and walking are other crucial elements that reduce personal car use. Transportation routes that do not have a major carbon footprint to construct are also vital to a climate plan. Light rail is great but involves a very large carbon footprint to build. Establishing an electric ferry system only requires building the docks and charging stations. The "road," which is the river, is already there. The Frog Ferry system checks lots of boxes.

In addition to supporting the health of the environment, an electric ferry system supports the health of its riders—by encouraging walking and biking to ferry docks, and by offering a lovely, quiet travel experience replete with river scenery and without the stress of freeway driving or public transportation in less scenic settings. The importance of quality of life shouldn't be underestimated when considering community health.

Economically, the Frog Ferry system will provide jobs, provide transportation to jobs, and support tourism.

Thank you for the invitation to community members to share their views.

Sincerely,
Anatta Blackmarr

From: [annie](#)
To: [Clean Energy Fund](#)
Subject: feedback on climate investment plan
Date: Thursday, March 23, 2023 10:48:29 AM

I love this program and wish you luck!

here are some thoughts:

- Can more be done to specify removing gas appliances and preventing them in new housing construction for indoor health in low income households? Can this money be spent to install automatic shut off valves (for earthquakes) in pre-existing gas-powered homes? (and also pay for re-setting them, cuz the gas company doesn't do that.)
- Should the tree canopy monies be expanded to include protection and maintenance for old giant trees on private properties, especially in shade deficient areas with narrow right of ways, where they should be viewed as a community resource for shade equity and sequestration? Can the money be spent on lobbying the city to prevent rollback of rules contractors have to follow to protect trees?
- Can some of the transportation decarbonization planning allocations be increased and used to begin the process of a transition to fareless transit, starting with low-income and BIPOC populations?
- How will strategic programs (city implemented instead of grassroots community funds which are being proposed as a vast majority of the funding) require community input and oversight?

annie capestany



From: [Mary King](#)
To: [Clean Energy Fund](#)
Cc: [Engstrom, Eric](#); [Baraso, Sam](#)
Subject: An Initial Proposal for Investment in Climate Adaptation for Child Care
Date: Friday, April 7, 2023 12:32:51 PM
Attachments: [Child Care Climate Adaptation Investments.pdf](#)
[ATT00001.htm](#)

Hello!

Thank you for the opportunity to provide input to PCEF's exciting Climate Investment Plan for Portland.

I am writing with an initial proposal for your consideration, for a focus on climate adaptation strategies for early childhood education and care - an often overlooked sector, despite it's essential role in our economy and the significant impact it has for racial, gender and economic justice.

I'll attach the proposal, and also paste in the text below.

I'm sending it on behalf of a community advocacy committee for our new universal preschool program, Preschool for All. We would be very happy to work with you, and other community partners, in any way to develop this idea and proposal.

Thanks!

Mary King, Co-Chair
UP NOW Community Advocates

Initial Proposal for Child Care Climate Adaptation as a PCEF Investment Focus

Child care is an important, generally overlooked, potential focus for climate investment. Young children are particularly vulnerable to the negative health impacts of extreme heat and polluted air. Most local child care providers lack the ability to keep children safe during episodes of extreme heat or smokey air. If providers have to close, they send children back to homes that may be no safer, often at the cost of their parents' ability to work.

Child care operates on a shoestring, paying low wages and locating in homes or inexpensive real estate. Families can't afford to pay the true cost of child care, so providers don't have the resources to invest in climate adaptation. Critical first steps would be to

- a) purchase and install electric heat pumps to replace furnaces reliant on fossil fuels, also providing the ability to cool and filter the air, as well as to
- b) create large, indoor play spaces to provide opportunities for active, physical play when playing outside is unhealthy.

As of December 2022, there were 1,022 providers in Multnomah County, 23 percent fewer

than before the pandemic hit child care particularly hard. In 2019, 37% of Multnomah County's child care work force identified as people of color. Child care is among the lowest paid 2% of occupations. In Multnomah County in 2019 - the last year for which data is reliable given severe undercounts during the pandemic - 29% of child care workers, 12% of preschool teachers and 20% in-home child care providers relied on SNAP (food stamps) to help feed their families.

In November 2020, Multnomah County voters overwhelmingly approved the creation of a universal early childhood education and care program for the county. Four of every five County residents live in the city of Portland. Fully implementing Preschool for All by the fall of 2030 will require many more Portland providers than are currently operating.

PCEF could make a big difference by investing in the purchase and installation of electric heat pumps for heating, cooling and air filtration, as [Maine has begun to do for schools](#), as well as by creating a renovation fund for creating large indoor play spaces and shades for outdoor play spaces. Employment and training in these activities would benefit local workers and young people, while adding green jobs to the economy.

Solid estimates of costs will require consultation with both local HVAC installers and with builders. A very rough, ballpark estimate of total costs might be about \$80 million for

- 1) \$25 million for purchase and installation of 1,000 heat pumps at \$25,000 apiece,
- 2) \$36 million for 1,000 additions of an average of a 300 square foot indoor play space, [at \\$120 per square foot](#),
- 3) \$10 million for recruitment and training experiences for people interested in either HVAC or construction work, and
- 4) \$9 million for administration of the program.

DARLENE CHIRMAN

March 30, 2023

Bureau of Planning and Sustainability
City of Portland
CleanEnergyFund@portlandoregon.gov

RE: draft Climate Investment Plan

Portland Clean Energy Fund Committee and City staff:

I have reviewed the draft Climate Action Plan; I am very pleased to see this move forward. I have some comments on the draft which may strengthen the Plan and its implementation.

Transportation Decarbonization.

Five percent of the funds are allocated to transportation decarbonization, although transportation accounts for 42% of carbon emissions in Multnomah County. I suggest that the PCEF staff and Committee review bus and Max routes in the target communities and see if the residents are adequately served. Public transit is energy-efficient and low cost, thus benefiting the climate and low-income residents. The federal infrastructure bill provides additional funding for public transit, and funding should be focused on the target neighborhoods; some matching funds to increase funding to Portland may be appropriate, for electric or hybrid buses, which will improve air quality as well as reduce greenhouse gas emissions, or additional routes. I saw today that TriMet has been awarded \$5.5 million for low-emission vehicles—these should replace diesel buses in low-income neighborhoods where air quality is often the poorest. Partnering with school districts that apply for federal funds for low-emission school buses, providing matching funds, may be a worthwhile strategy (see below).

I do support the electric bicycle programs as described in the draft plan. Funding secure charging/storage in low-income multi-family housing can facilitate usage of electric bikes. The program should also include funding for electric bikes that could be owned by the organizations operating low-income housing, especially transitional housing, that would be available for use by residents.

GoForth Electric Car Share has begun in several communities in Oregon, and there is the possibility of expanding to Portland. According to the forthmobility.org/goforth website, cars can be located at affordable housing developments. Exploring car share siting in Portland affordable housing sites with GoForth could supplement good public transit. Some subsidy in setting up the car share, such as funding installation of charging stations, could keep the cost affordable for target residents.

Community Severe Weather Response.

Strategic Program 5 will fund building upgrades for community severe weather response. The draft Plan states the building sites will be owned and/or managed by eligible

government entities and non-profit organizations. Thinking about what buildings might be available in and accessible to low-income neighborhoods in Portland, I urge you to include schools, such as gymnasiums, cafeterias or other assembly buildings. Public recreational facilities could be appropriate (Mt Scott Community Center is utilized as a severe weather facility). But I fear that such facilities are rare in low-income neighborhoods. Branch libraries could also serve this function.

Including battery backup is mentioned as one possible energy upgrade; this is a crucial element, which can be combined with solar arrays, to provide life-saving energy for residents who require medical equipment, for example, during power outages. This could serve the wider community for phone charging, etc. in power outages.

Outreach may be needed to ensure potential sites know of the funding program so that proposals can be submitted, and that the upgraded buildings are distributed among the target neighborhoods.

Green infrastructure.

I am very supportive of the Equitable tree canopy program, SP8. I testified in support of this program and the funding allocation at City Council when it was adopted. Although it will take years for the trees to grow to the size to provide shade, this will go a long way to providing shade equity in our city.

I have observed that some neighborhoods, especially low-income ones, lack sidewalks and parking strips where trees can be planted. I suggest that staff work with PBOT in such circumstances, to evaluate if bulb-outs could be constructed at intervals along such streets to accommodate tree planting.

I also urge that the PCEF staff work with non-profits such as Friends of Trees that already have established connections with the vulnerable neighborhoods lacking adequate tree canopies.

I do support the green infrastructure maintenance reserve that will allow low-income property owners to access funds by application for maintenance of existing trees. I feel, however, that it does not go far enough in addressing the tree maintenance issue that overburdens low-income homeowners and may make other low-income residents reluctant to have new trees planted in their parking strips. After the 5-year maintenance period, the homeowner becomes responsible for tree trimming, which can be quite costly as the trees mature.

I have a suggestion that could be explored. Recent federal programs support urban forests, and the City could apply for funds for tree planting and establishment care as allowed by the programs. Grants awarded could fund a portion of the \$40,000,000 for tree planting, and the savings could be applied to long-term tree maintenance in low-income neighborhoods, without individual application. Low-income residents in mixed-income neighborhoods could still qualify for funds by application. In future 5-year planning cycles, as tree planting may need to be less intensive, increasing funds could be applied to tree maintenance in low-income neighborhoods.

Regenerative Agriculture.

The description of increasing soil carbon could be expanded to include other actions in addition to increasing soil organic matter. Adding biochar (similar to charcoal but created under low-oxygen conditions, creating a stable form of soil carbon) to soil can increase water-holding capacity and increase plant productivity, in addition to carbon storage in the soil. Growing perennial native grasses in buffer areas can also sequester carbon.

I realize that the first 5-year plan is focused on land acquisition and planning, but including other soil management practices in the first plan is warranted.

Climate-friendly public schools.

The draft plan mentions three categories of assets where PCEF could play a role in reducing emissions and improving the schools for local residents. With 48 schools among 6 school districts, there are many opportunities! Schools play an important role in communities, with the grounds utilized by local residents outside of school hours for recreation. The school buildings may be used for community functions as well.

I concur that PCEF funds could be used to increase the energy efficiency and possibly for solar installations—often done on structures over parking lots at schools. These investments can improve comfort for students to enhance learning while reducing emissions. The energy cost savings can benefit educational investments for students.

RE school transportation, there are new federal programs for replacing diesel school buses with electric or hybrid buses. Several Oregon school districts have been awarded funds for low emission buses, but I don't think any in the Portland region have been funded to date. There may be opportunities for PCEF funds to layer with the federal grant programs. I don't think the federal programs cover privately-owned buses that school districts contract to transport students. There may be opportunities to assist school districts to front-load funding for multiyear contracts so the contractor can purchase climate-friendly, less-polluting buses, with lower operating costs so lower contract fees in later years.

School yards have a great potential for tree canopy for shade, and potentially for native gardens or vegetable gardens for student participation in growing fresh food for school lunches. The initial maintenance for planted tree will an important component; in designing plantings, the potential for de-paving part of the school grounds should be considered.

I look forward to seeing the net draft of the Plan incorporating input from the school districts in how PCEF might best partner with the schools in climate action with secondary benefits for students and the community at large.

Portland Clean Energy Fund Website.

I encourage you to expand the PCEF website to include a section on available services to members of the public. A format could be developed and each grantee could fill out the information about services provided and eligibility requirements for participants. This would need to be updated with each grant cycle, and upon completion of services of grantees.

Last year a neighbor was considering solar panels for her home, and since she is low-income, I looked on the PCEF website to see what programs were available to her and couldn't find this information.

Summary. I applaud Portland's Bureau of Planning and Sustainability and the Portland Clean Energy Fund for developing this first draft and seeking public input to improve the initial 5-year Climate Investment Plan. It is rewarding to see this move forward, to provide equity to our BIPOC and low-income residents and reduce greenhouse gas emissions that benefit all of us.

Sincerely,

A handwritten signature in cursive script that reads "Darlene Chirman".

Darlene Chirman

From: [Trinh, John](#)
To: [Clean Energy Fund](#)
Subject: public comment: PCEF Climate Investment Plan preliminary draft
Date: Friday, April 7, 2023 12:35:21 PM

Good morning,

First I would like to applaud your commitment in creating space for energy efficiency upgrade and renewable energy improvement for low-income homeowner.

My name is John Trinh, I work for the Housing Bureau. I am the manager for the Neighborhood Housing Preservation Team. Our team provide lead abatement, down payment assistance, home repair, home improvement, healthy home improvement, home buyer education, foreclosure prevention programs, and preservation counseling programs for the low-income homeowners with a commitment to the black, indigenous, people of color communities in Portland.

I have reviewed your draft of the climate investment preliminary plan as it relates to single family homes. Overall you have hit the mark as to the needs of the community and providing resources to support your mission. Many low-income families we work with at <80% AMI struggle with home repair. It is great to see that the amount of PCEF investment for this category is up to \$50K per home. Many of the homeowners we work with have moisture concerns and replacement of the roof are warranted. I can see that replacing a roof to add insulation to improve efficiency or solar panel as a way to create renewable energy, is a perfect project for many homeowners. I would ask that you consider increasing the construction budget for each home from 30% to 40% to create a better budget to enable repairs, accessibility measures, and other necessary life, health, safety measures. At \$50K/home investment with a construction budget at 30%, you would have \$15K to replace the roof. At a 40% construction budget, this amount would increase to \$20K; which is more inline with today's inflation cost.

Once approved and as more detail are developed, I hope funding from PCEF will include staffing and overhead cost allocation associated with goal for each strategy.

I am excited for this opportunity and look forward to supporting Portlanders to be more energy efficient and creating more renewable energy improvements.

Thank you,
John Trinh

Sent from [Mail](#) for Windows



April 7, 2023

Portland Clean Energy Fund
Attn. Sam Baraso
1810 SW 5th Ave., Suite 710
Portland, OR 97201

Re: Preliminary Discussion Draft - Climate Investment Plan

Dear Sam,

Thank you very much for the opportunity to provide comments on the first climate Investment Plan. While we understand that this document is a preliminary discussion draft, it is critical to ensure that even at this early stage, the document and plan lay the groundwork for tangible results, especially in the renewable energy/energy efficiency and workforce/contractor development sections.

While we are still going through the details, NAMC-OR is supportive of the overall direction and goals of the plan. We believe that it represents a good starting point for engaging the community, identifying priorities, and reassuring the public that PCEF investments made under this plan are sound and inclusive. We would also like to add that as with any five-year plan, it is difficult to completely predict needs and costs this far in advance, so we would strongly recommend the infusion of flexibility and the ability to easily make changes in the plan down the road. We need an operating system such as the one outlined here to join this effort, but we don't need a plan that is permanently fixed and cannot change as changes take place in technology, science, and public expectations.

NAMC-Oregon would like to provide some specific points regarding the plan:

1. An annual Council review of the plan and its funding categories and requirements should ensure that the plan remains flexible and responsive.
2. The plan must make explicit that contractors of color are equally welcome whether they are union or open shop and have equal access, opportunities, and standing to participate in projects; and any advisory body must have equal representation between union and open shop contractors and organizations. These reassurances should also be included in the following passage regarding utilization goals:

"The adoption of measurable and ambitious goals for the utilization of diverse workers and contractors (i.e., from PCEF workforce priority populations). PCEF is nearing the final review of its climate workforce/contractor supply and demand study that is being written by ECONorthwest, Cadeo, Worksystems, and Portland State University assistant professor Dr. Roberta Hunte. This study, in collaboration with the PCEF High Roads Advisory Council, will be used to inform diverse worker and contractor utilization goals for community responsive grants and each strategic program in the next public comment draft of the CIP." (p12)

3. The plan needs to be explicit that projects that combine multiple strategies and funding buckets to increase energy efficiency and conservation, and to fight climate change, are eligible for PCEF funding, and that the

draft funding categories represent buckets, not barricades. It is essential that plans prepared this far in advance avoid overly restrictive categorization and walling off of funds years down the road.

4. When considering housing projects, the environmental health of residents of affordable housing needs to be given equal weight, and possibly priority, over purely energy-related metrics. It makes no sense to have a metric or requirement of reduced kilowatt hours if the residents are suffering from asthma, allergies, and other negative health effects of climate change. Furthermore, the priority populations identified in this plan are particularly susceptible to illnesses such as hypertension, diabetes, COPD, and others that are hugely overrepresented in low-income communities of color, who are also overrepresented in the city's aging multifamily housing stock. NAMC-OR requests that resident health be included in the plan as a specific top priority.

5. Projects should be included for eligibility by nonprofits that can meet the goals of the plan and that include property acquisition and/or site control if the entire project can be shown to significantly advance the goals of the plan.

NAMC-OR, the Portland Opportunities Industrial Center (POIC), and the Black Business Association of Oregon are moving forward with the creation of a culturally specific workforce and business development center that focuses on construction, manufacturing, architecture, engineering, and entrepreneurship. We are attaching a detailed project plan, but from the overview:

"This innovative project is a one-stop shop where people of color and other historically marginalized community members can access a variety of culturally specific training and supports. The Center also hopes to capitalize on the billions of dollars that are available (or will be soon) at the federal, state, and local levels, including the City of Portland Clean Energy Fund and President Biden's \$1.2 trillion Infrastructure Investment, and Jobs Act. This project is long overdue in our state and ensures available funding reaches the intended populations via a project led by and for people of color. This also means people of color will have the chance to see individuals from their same cultural background in leadership roles at the Center and in action among Portland's business community.

Once built, The Center will provide state-of-the-art training and networking space, bringing together jobseekers who have been historically excluded from the highlighted sectors, emerging businesses and entrepreneurs often locked out of economic opportunities and other supports, union and non-union apprenticeship programs, and experienced businesses to provide connections and mentorship."

Our three organizations are in discussions with a public owner of a potential site that will 1) meet and exceed every goal in the draft Climate plan for priority populations, workforce development, contracting, racial equity, and community involvement; and 2) will need significant investments in construction and renovation for energy efficiency and conservation, green energy, reduced carbon emissions, and other climate-friendly functions. While this could be considered a single project, it will draw on multiple buckets of PCEF funding and represents multiple sub-projects. We should not have to choose between arbitrary bucket lines to provide a project that so strongly meets the goals of the plan.

We look forward to a continued partnership with the City of Portland and the Portland Clean Energy Fund to help bring this effort to fruition.

Sincerely,



Nate McCoy
NAMC-OR, President and CEO

From: [Patricia Bognar](#)
To: [Clean Energy Fund](#)
Subject: Frog Ferry...
Date: Thursday, April 6, 2023 5:36:07 PM

It is my fervent wish that the Willamette River return to its glory days, as a purveyor of goods and people.

The proposed **Frog Ferry** would provide the **Rose City** with a boost to the public mood, which is much needed at this time.

Cities around the world use the urban boundaries of their **rivers** to transport and entertain their inhabitants, and to dazzle the city's visitors. I believe the ferry would also alleviate troubled traffic 'spots' in Portland.

Sincerely,

Bruce Charles



Portland General Electric

121 SW Salmon Street • Portland, OR 97204
portlandgeneral.com

April 7, 2023

Sam Baraso, Program Manager
Portland Clean Energy Fund
1810 SW Fifth Avenue, Suite 710
Portland, Oregon 97204

SUBJ: Preliminary comments on Draft Climate Investment Plan

Dear Sam,

Portland General Electric (PGE) appreciates the opportunity to comment on the Portland Clean Energy Fund (PCEF)'s preliminary draft Climate Investment Plan. Last week, PGE filed its Integrated Resource Plan and our first Clean Energy Plan with the Oregon Public Utility Commission. These documents outline our path towards a clean energy future, which are aligned with the City's Climate Emergency Workplan. PGE aims to reduce greenhouse gas emissions from the power we serve our customers by at least 80 percent by 2030, 90 percent by 2035, and 100 percent by 2040. We will transform the way we do business and look forward to working with our customers and communities, including key partners such as PCEF, to achieve an affordable, reliable, and clean energy future.

We see a significant opportunity for strategic alignment between PGE and PCEF and offer the following preliminary comments on your Climate Investment Plan. We expect to have more detailed comments on your subsequent more detailed plan as we aim to support successful implementation of your programs throughout PGE's service territory.

Preliminary Comments on Draft Climate Investment Plan

1. Renewable energy and energy efficiency

We applaud the focus on renewable energy and energy efficiency, which dovetails well with our Clean Energy Plan calling for community-based renewable energy and customer participation in energy efficiency and demand response programs. We encourage additional focus on combining energy storage, demand response, and load shifting capabilities into your individual programs. Current overall energy usage trends on an hourly basis do not always align with actual energy generation from solar and wind sources. To meet energy demand with these more intermittent renewable sources, we must have the capability to both store energy generated from these renewable sources, and to shift energy usage away from peak times.

2. Focus on frontline communities

We fully support the focus on programs for Portlanders on the frontlines of climate change, including those facing high energy burden. In 2022, PGE launched an income qualified bill discount (IQBD) program, which provides 15-25 percent electricity bill discounts to customers at certain income levels. We are seeking ways to use our IQBD and other data to target energy saving



Portland General Electric

121 SW Salmon Street • Portland, OR 97204
portlandgeneral.com

Sam Baraso, Program Manager
Portland Clean Energy Fund
April 7, 2023
Page -2-

opportunities to customers with the highest energy burden to lower their energy costs. Partnering with community organizations is important for PGE as part of our company's commitment to diversity, equity, and inclusion. If we can be supportive to you as you work with communities and build out your potential programs, please do not hesitate to ask.

3. Transportation electrification

We support your ambitions with respect to transportation electrification. In particular, we want to encourage investments in charging infrastructure in multifamily housing projects. And reinforcing the comments above, programs that have the capability to shift electric vehicle charging to optimal times of the day to support the grid will be key to overall achievement of the City's and PGE's electrification goals. This ultimately includes bi-directional charging and managed charging systems. Finally, PGE would be interested in participating in the transportation decarbonization working group that PCEF plans to convene.

We anticipate having more to say in the next round of comments, but we wanted to share these initial comments with you now. We look forward to supporting the City's ambitions and goals to achieve an equitable clean energy future together.

Sincerely,

Nik Blosser
Vice President, Public Affairs

From: [Doug Larson](#)
To: [Clean Energy Fund](#)
Cc: [REDACTED]
Subject: Frog Ferry
Date: Monday, April 3, 2023 3:54:02 PM



The Portland Harbor Community Advisory Group supports the Frog Ferry to fill a missing link in Portland transportation choices. Our mission is to ensure the public is represented in Superfund cleanup decisions. Putting people in boats on the Willamette River is simply the best way to connect people to our history and the possibilities for a future. Beyond the benefits of commuting, the sheer joy of moving across the water can bring life back into the core of the city. Portland can once again be special.

Funding is critical to implement a pilot program that will leverage Federal Transportation resources. This is a once in a generation opportunity to revitalize a neglected asset. The central city has been hollowed out by migrating revenues. Give people the means and a reason to return. Give them a river.

Doug Larson, for the PHCAG

Reyes, June

From: Laurie Mitchell <[REDACTED]@net>
Sent: Friday, April 7, 2023 4:39 PM
To: Clean Energy Fund
Subject: Letter of Support for Frog Ferry to serve the community in a variety of ways with support from the clean energy fund

Our family returned after spending last weekend in the San Diego/Coronado areas of California. While there, we had the fun and the economic use of the San Diego/Coronado ferry system between the two locations. Other Portlanders happened to be traveling with us and one remarked, “Ya know, if Portland did have a ferry like this one, we, too, would use it and our visitors would find it a bonus visitor destination - one without driving.”

We’re writing in endorsement of your committee’s consideration of this valuable possibility (Frog Ferry!) for funding to enlighten our community’s awareness of saving energy while utilizing a positive, diverse population - both in use and diversity in workforce. Imagine the number of children who could also learn about our area’s history — not to mention the positive impact it could have on Portland’s image for the local community.

Thanks your your consideration of bringing something useful, creative, and purposeful to our area! Seemingly, a lot of the work on this idea has already created - also being a bonus for financial savings and the ease of implementation. Thanks for your appraisal of this valuable, clean energy savings for our area.

Sincerely,
Laurie and Mike Mitchell and family
Harold and Kae Myers and family
Anna Wessinger

Thank you for the opportunity to provide feedback on the Climate Investment Plan (CIP) for the Portland Clean Energy Fund (PCEF) 5 year plan. The dissemination of over 750 Million dollars across 5 years is an incredible opportunity to have an impact on Portland's climate resiliency for decades to come. This fact also comes with tremendous responsibility and the commitment to PCEF's guiding principles and priority populations will be key to that success.

I did notice the breakout of funding and noticed the large gap for green infrastructure maintenance reserve at 5 million that was quite low and strategic programs that received the lion's share at \$564,000 million and the community responsive grants at 181,000 million.

The opportunity to address multiple challenges that a changing climate presents to build resiliency will impact Portlanders indelibly. How we choose to see and address the problem will affect the solutions that will be taken to address, that can either reinforce system of inequality & caste or reinvent systems to address the needs of so many who have been left behind.

Several things stood out for me that I would like to include for your consideration.

Supporting plant based food systems as a critical component of addressing the climate emergency is a low hanging fruit and critical to address climate as well as worsening and extreme conditions for food production that could benefit greatly from urban farm efforts. The City of Los Angeles City Council signed on to plant based treaty as one important step to address the climate emergency comprehensively.

<https://plantbasedtreaty.org/los-angeles-city-council-unanimously-endorses-the-plant-based-treaty/>

The funding to address the urban tree canopy is a significant investment that is much needed. Will the considerations and planning for the types of green spaces/greenery that contribute to a healthy ecosystem that address the changing climate, water use required, biodiversity and include community gardens as well as food forest and a wide variety of foliage and greenery that will contribute to climate resiliency as well as address the urban heat island effect and disparities by geography & class? Consulting with both local based community programs as schools such Portland State & OSU on the design and layout of such a project with community input?

The Strategic Program 9 on Increasing urban farming opportunities for planning & land acquisition of 4 million across 5 years seems like an under investment that could use more robust allocation. The plan to support 2-3 organizations sets up this funding to favor bigger more established programs when the knowledge base and lived experience in urban farming resides much smaller and would benefit from casting a wider net to include smaller programs to be included in this funding opportunity and who could also benefit from capacity building grant funding to expand on what is working well, and work on the ground to collaborate with communities who are interested in starting community gardens and backyard gardens with support of seed, soil, education.

Also, it would be helpful if the definition of climate jobs could be expanded. "Green jobs" can include low carbon jobs that are needed for a healthy, thriving community that are critically needed, including caregiving of the elderly, children and teaching jobs. Needed health care positions in the PCEF target communities would benefit greatly in funding scholarships, internships and apprenticeships can go far in increasing the number of professionals who can enter into such positions that are much needed.

Funding to support people to start businesses in the PCEF priority populations that contribute to a healthy, thriving community can be included and expanded to all kinds of low carbon businesses, not just putting up solar panels or energy retrofits. Even a beauty salon, a tax business or a restaurant or cafe can be business that contribute to a climate resilient city.

Investment in Mental health services that are culturally competent is a critical response to the climate crisis, and ensuring that communities that are in much need of these services can be served by professionals that also reflect the diversity of the communities and need for MH services as the climate crisis is exacerbated.

Addressing homelessness with appropriate climate resiliency housing is part of climate justice for populations already experiencing the impacts of extreme weather events. Will organizations that address homelessness be included for consideration in the grant making process?

Finally, climate mitigation projects must first begin with valuing and assessing the value of ecologically sensitive sites that enhances the protection or contributes to the health & well being of a community must be valued and prevent and minimize development of those areas. Any mitigation project must first avoid & minimize development that poses avoidable threat to sites that protect precious natural resources, ameliorate extreme weather events and protect water quality through protective city codes and thoughtful planning through BPS' Planning Commission. These impacts must be considered in the application process for development & should consider GIS data and the latest available information on environmental, climate & community impact.

Community must be at the driver's seat of any mitigation projects that are proposed with opportunity to weigh in at every stage of the project & mitigation sites must also include community input on its benefit site if approved.

Thank you so much for the opportunity to provide input. I greatly it.



TOGETHER FOR NATURE

April 7, 2023

To: Portland Clean Energy Fund staff
From: Portland Audubon
Re: Preliminary Climate Invest Plan (CIP) Draft

We appreciate the opportunity to comment on the Portland Clean Energy Community Benefits Fund's (PCEF) Preliminary Climate Invest Plan (CIP) Draft. Portland Audubon supports the direction that this inaugural CIP outline proposes, appreciates how it attempts to balance a huge array of urgent community priorities, and remains committed to PCEF's commitment to climate justice. We appreciate how PCEF staff have received community feedback to date, and believe the processes you have put in place for the development of the final CIP, of which comments on this draft is just one part, will help ensure that the impact of the program matches its intent. Please accept the below comments that we believe will help strengthen the proposal.

In general, we feel that the green infrastructure programs within the CIP have received inadequate funding allocations, and are unnecessarily constrained in this current draft. This is a troubling trend, as green infrastructure projects are accessible to broad community participation that does not require significant training or expertise, provide significant multiple community benefits in addition to carbon sequestration, and can be deployed swiftly across most land uses and public/private space. While the CIP draft does a great job in outlining the expanded development of specific programs and projects to reach PCEF's stated mission, it could do a better job of finding ways to integrate them together to maximize the breadth of community benefits a completed project can provide. The integration of green infrastructure into other PCEF projects could provide an outsized tool to facilitate this cross program integration and maximize the benefits and positive impacts of those projects. We have several specific suggestions on how to better integrate and prioritize green infrastructure into the whole program;

- Create an internal PCEF program with dedicated staffing that would work to integrate green infrastructure into past, present and future funded PCEF renewable energy, energy efficiency, and transportation decarbonization projects.
 - This could involve working with grant recipients to offer them a suite of green infrastructure options that may be compatible with their project concepts and connecting them to local non profits organizations who

specialize in the design, installation, and maintenance of this infrastructure.

- It would provide the program with an opportunity to play matchmaker in connecting PCEF grant recipients to new and emerging green infrastructure professionals who have received workforce and contractor development funding to be employed in the design, installation and maintenance of green infrastructure alongside an energy efficiency retrofitted building for example.
- Integration would lend some efficiencies to certain projects and increase the GHG reductions and sequestration goals of each project.
- Within the Transportation and Decarbonization funding category, create an opportunity for funding community visioned and led projects that collaborate with the Portland Bureau of Transportation to include green infrastructure design and installation within the public right of way that facilitates increased safety and efficiency of transportation modes with no to little GHG emissions like walking, biking, and rolling.
 - Some existing programs and initiatives at the city that PBOT could help community organizations vision and implement are the [Slow Streets Program](#), [Neighborhood Greenway Program](#), or various green infrastructure treatments that are laid out in the [Pedestrian Design Guide](#) like [Trees in the Curb Zone Project](#).
 - PBOT technical expertise and planning could be combined with community vision to smartly implement projects to reduce emissions, increase community safety and livability, while also sequestering carbon.
 - PCEF funds could help supplement and integrate these projects to a greater extent across the City.
- The Green Infrastructure programs need more significant funding allocations across the board
 - As a funding category, green infrastructure is less than 10% of the total proposed CIP budget, which is a reduction from previous distributions and the program's initial allocation. We've heard from staff that this proposed shift is following trends from the first two RFP's where there was limited demand for funding of green infrastructure projects. We'd caution against using this limited sample size to shift the CIP allocation to green infrastructure dramatically. We believe the lack of demand was not for lack of ideas or prospective projects, but rather because the timing of funding opportunity coincided with significant transition in how the City approached community tree planting which created a lot of uncertainty, the need for community organizations to scale up capacity to participate at a higher level, and because of the complexity of navigating City permitting around tree planting.
 - We urge staff to increase the green infrastructure community responsive grants allocation to at least \$10,000,000 over 5 years so it would be substantial enough to support a variety of projects

across the spectrum of the program like depaving, tree planting across the city, habitat restoration, etc. At its current level, the annual allocation to community grants could be used by solely one community project.

- We urge staff to increase the green infrastructure maintenance reserve, as a significant portion of the current allocation will likely be needed to limit inequitable implementation of the Equitable Tree Canopy Strategic Program. That program does not have its own funds to provide maintenance support to existing street tree owners in its service area who might have cost burdens that disallow them to care for these assets. With less than \$5 million spread across 5 years, the fund will be wholly inadequate to serve this and the overall need for this service citywide.
 - Green infrastructure workforce and contractor development allocations also should be increased to be more aligned with other program categories and meet the demand from the community.
- In addition to increasing the overall funding levels for green infrastructure, a greater percentage of that funding needs to be targeted for community organizations and small businesses to vision and implement their own projects as opposed to projects led by the City. At minimum 50% of the Equitable Tree Canopy Strategic Program needs to be distributed to community organizations and contractors. This is important to stay true to the intent of the program, to empower communities to make their own decisions and implement projects to build climate resilience and justice for themselves.

Lastly, in the development of the CIP and its programs, PCEF has made strides in its efforts to recognize and serve the disability community, however the program still has a long way to go to ensure this population, which is both underemployed and vulnerable in a climate disaster, are factored into all of PCEF's programs. Portland Audubon stands firm in its recommendation to recognize the disability community as a frontline community in the climate crisis. While we are aware that will not be added as a priority population at this time, we do believe there are steps PCEF can take to improve the impact of this program on these communities:

- Continue to seek out and inform the disability justice community of the community responsive grant opportunities to increase their likelihood of submitting successful project applications.
- Center and prioritize the disability community alongside other PCEF priority populations in the development of the Building Upgrades for Community Severe Weather Response program. This is especially relevant to siting locations along public transit, distribution of sites across the City, and ensuring facilities and services are completely accessible.
- Capacity Building: Because disability justice is largely left out of the environmental justice movement in Portland, invest in disability-led organizations

so they can hire people with this intersection of expertise and thereby increase capacity.

Again, we appreciate the opportunity to provide input on this exciting new program.

Sincerely,

Micah Meskel
Interim Urban Conservation Director
Portland Audubon

Ali Berman
Communications and Marketing Director
Portland Audubon



Date: April 7, 2023

From: Bob Sallinger, Conservation Director, Willamette Riverkeeper

To: City of Portland Clean Energy Fund

Re: City of Portland Draft Clean Energy Fund Investment Plan

Thank you for the opportunity to comment on the Draft Portland Clean Energy Investment Plan ("Plan"). Please accept these comments from Willamette Riverkeeper. Willamette Riverkeeper is a 501(c)(3) non-profit conservation organization dedicated to protecting and restoring the Willamette River and its watersheds, including the portions that pass through the City of Portland. The Portland reach of the Willamette River represents the most degraded stretch of river in the State of Oregon. Restoration activities associated with the Willamette River and its watersheds in Portland present important opportunities to advance climate mitigation and adaptation while simultaneously advancing equity and inclusion, water quality and healthier urban landscapes for people and wildlife.

We appreciate the work that has gone into this plan and there are many laudable elements. However, we have significant concerns with it as currently drafted. These concerns include the lack of integration with the City's existing climate priorities, lack of accountability mechanisms, and inadequate attention to strategies that sequester carbon and increase landscape resilience. We would offer the following recommendations to improve the plan:

1. **The Plan needs to directly reference the [City of Portland Climate Action Plan](#), [City of Portland Climate Emergency Declaration](#) and the [City of Portland Climate Emergency Work Plan](#):** Together these and associated documents lay out a strategy for reducing Portland's climate emissions by 50% by 2030 and 100% by 2050. It is deeply surprising that the Investment Plan does not reference these documents or other guiding documents related to the City of Portland's climate agenda. Instead the Investment Plan appears to have been developed entirely de novo as though Portland was becoming aware of the climate emergency for the first time. Tremendous work has gone into setting climate priorities for the City of Portland and the Investment Plan should be fully integrated with these existing documents. Each section of the Investment Plan should directly reference the City's existing climate strategies and address how it advances the City's climate goals. Doing so will help ensure that PCEF meaningfully advances a well-considered strategy, coherent for addressing climate change as opposed to isolated, fragmented actions that may or may not add up to a substantive progress on what the City has rightly described as an emergency. Doing so does not preclude PCEF

from integrating or adding additional objectives and actions, but it will help ensure that the city has a unified, coherent, credible approach.

2. **The Plan needs stronger accountability measures to ensure that all investments meaningfully advance carbon sequestration and emission reduction goals.** As currently written we do not have confidence that mechanisms are in place to adequately select projects to ensure that they have a significant nexus with advancing the city's climate agenda, evaluate the efficacy and impact of those projects over time and adaptively manage the program as it advances. The Investment Plan includes immensely broad strategic program areas that sometimes encompass more than \$100 million dollars and remarkably broad metrics to select and evaluate projects. While each of the strategic program areas is commendable in its own right, it is essential that the public, which overwhelmingly supported PCEF at the ballot, has confidence that individual projects actually do substantively advance the climate agenda. We would recommend that the Plan add significant detail regarding the following:

- a. Processes for ensuring that each strategic program area includes rigorous selection criteria and expertise to ensure selected projects have a strong and direct nexus with climate action.
- b. Strategies (including funding needs) to evaluate the efficacy of projects that are selected.
- c. Annual rather than five year reviews of program areas to ensure meaningful impact is being achieved.
- d. Adaptive management strategies to review and refine program areas over time.

We are concerned that the Plan appears to rely heavily on the term "Total lifetime CO₂e emissions reduced" as the primary metric for evaluating the climate impact of projects. First, this evaluation criteria appears to only apply to projects that are being implemented—carbon metrics should be used both at the project selection and the project evaluation phases. Second, there is no information as to how the City will actually gather and evaluate this information (who is responsible for collecting data and evaluating data, how much will this cost, etc.). We urge the City to significantly expand on how carbon sequestration and emission reduction criteria will be evaluated in each project area.

3. **The Green Infrastructure Section should be much stronger and integrate a broad range of green infrastructure strategies:** Green infrastructure has historically been under emphasized in City of Portland's climate strategies. This is unfortunate because green infrastructure presents critically important strategies for sequestering carbon, advancing climate justice, creating more climate resilient landscapes, and achieving multiple other community benefits. We believe that the 10%-15% of PCEF allocated to green infrastructure and regenerative agriculture combined was far too small, but even within the confines of these limitations, we believe that the Investment Plan could be much more robust. We would make the following suggestions

- a. \$5 million out of an anticipated \$750,000,000 (0.06%) is far too small of a funding allocation catchall for all green infrastructure strategies outside of tree canopy and regenerative agriculture. We would recommend significant funding resources be designated for green roofs, green streets and most notable habitat acquisition acquisition and restoration.
 - b. We specifically recommend that the City include habitat mitigation banks as eligible for funding. Habitat mitigation banks would allow the city to acquire and restore natural sites that could sequester carbon, provide landscape resilience (for example floodplains, wetlands and other high hazard areas) and allow the city to recapture and reinvest spent funds through the selling of mitigation credits.
 - c. The tree related strategies could be significantly improved. First, while trees are a critical element of green infrastructure, they appear to be overemphasized in this plan relative to other green infrastructure strategies. We recommend more evenly distributing green infrastructure funding over a broader array of strategies. Second, we believe the tree maintenance fund could be more effectively allocated. As currently proposed a limited subset of residents could access funding to retain subsidized tree maintenance and pruning services. This appears to us to be a potentially very expensive way to achieve limited public benefits. We believe climate, natural resource and equity goals would be more effectively and efficiently achieved by investing in a comprehensive urban tree maintenance program that strategically prioritizes underserved areas of the city. While subsidizing tree maintenance on a property by property basis may give a veneer of equity, a comprehensive tree maintenance program would more effectively and efficiently improve the health of the canopy on a block by block neighborhood basis and thus the overall ecological, climate and environmental justice benefits. Third, the tree planting goals need significantly more detail in terms of what kinds of trees will be planted, how projects will be prioritized from a carbon sequestration, environmental justice and climate resilience perspective. Finally, we would also note that we are surprised that \$40,000,000 only gets the city 15,000-25,000 trees. Even at the high end of the tree planting spectrum, this amounts to \$1,600/ tree. We understand the tree aspect of the plan is not currently open for comment but we would nonetheless, urge the City to continue to work on this plan element.
4. **Regenerative agriculture priority area needs more detail as to how it will advance climate goals:** The Plan proposes to allocate \$19 million to urban agriculture projects. While this is a laudable goal, it is important to include evaluation criteria that ensure that the agricultural practices will be conducted in a manner that truly results in significant carbon sequestration. Ag practices and projects can span a wide range of climate impacts from high CO2 sequestration to high CO2 emission to simply no meaningful impact at all.
5. **Strategic Program 13, Fair and Flexible Capital, needs significantly more detail:** The City proposes to distribute \$105 million to third party institutions such as banks, credit unions, CDFIs, etc. to distribute funds to fund “climate focused projects.” While we recognize and appreciate the need to overcome institutional barriers to engage

historically marginalized communities, this represents a transfer of a significant percentage of PCEF funds over a five year period to institutions with minimal or no expertise or prioritization related to selecting projects to meaningfully addressing climate change. One of the biggest challenges for PCEF remains ensuring that this major public investment results in real progress on the ground in terms of advancing the City's climate agenda. All of the programs within the Investment Plan need more detail, but a program of this magnitude using third parties without a climate orientation to distribute funds raises elevated concerns. The City needs to clearly articulate the safeguards, project selection and evaluation criteria, and oversight mechanisms that will ensure that these funds are expended on projects that have a direct nexus with the City's climate goals.

Willamette Riverkeeper is currently in the process of expanding its long-standing urban conservation programs and looks forward to greater engagement with the PCEF Program going forward.

We appreciate your consideration of these comments.

Respectfully,

Bob Sallinger
Urban Conservation Director
Willamette Riverkeeper



Tim Miller – Public Comment on CIP Preliminary Draft

Comments in preliminary draft document summarized by R. Gilmore, PCEF staff

SP13: Access to fair & flexible capital

- Seems there should be an actual section on this. So far, only seeing brief references to this objective sprinkled throughout the document with no specificity / descriptions of likely programs / eligible partners / objectives, etc.

SP2: Clean energy in unregulated multifamily affordable housing

- Eligible measures – what about prioritizing things that boost indoor air quality (IAQ), a critical co-benefit? And what about considering the health benefit of cooling?
- Rent stability agreements – I understand these agreements have been hampered by a lack of follow-through/enforcement. Will the agency include that in the budget? If so, mention it.

SP3: Clean energy improvements in single-family homes

- “with options for renters” (pg. 16) – what about something special for SF homes owned by agencies serving low-income renters (REACH/ROSE, other)?
- The “Investment Strategy” section should discuss expectations for leveraging federal funds (at least! and probably should discuss others, like Oregon healthy homes, CCIs, Energy Trust, others...)

SP4: Clean energy in small commercial buildings

- Pg. 18 “Additionally, small commercial buildings (less than 20,000 square feet) would be eligible for building improvements if they are occupied by a qualifying small business.”
 - If it’s a “qualifying small business,” why do you also need to limit the size of the building?
- Pg. 18 “To mitigate these barriers for incoming or current qualifying small-business owners, the program will offer a two-pronged approach: 1) investing in clean-energy upgrades for business-owned appliances and equipment, and (2) investing in durable building upgrades which improve comfort and air quality for occupants.”
 - Unlike the 3 to 9 year commitments in residential, it's not clear how this two-pronged approach really mitigates the split incentive here.
 - “durable building upgrades which improve comfort and air quality” – don’t these also need to improve EFFICIENCY?

SP5: Building upgrades for community severe weather response

- Re “during climate-related disaster events” (pg. 20) – Not in seismic events? other emergencies like multi-building fires, social situations, others?

Community responsive grants – transportation decarbonization

- Goal measures – actual utilization (number or PCEF priority population members who actually USE the service, and number of such UNIQUE users) is much stronger than the number who have 'increased access.'

SP10: CBO capacity building program

- Goal measures “average increase in capacity – measured through capacity assessment...”
 - Sounds like this will be pretty hard to measure objectively. Can this be clearer?

Formatting/ clarity in document

- Pg. 10, “spending was aggregated within programs by funding category, or project type, and shows how much is invested in each of the funding categories: [bulleted categories]”
 - bullets / amounts are confusing / don't line up with table 1 consistently, and the language doesn't fully explain. Suggest just using totals for each category in table 1.
- Pg. 13, “Funding for climate-action related workforce development and contractor support is woven throughout multiple programs within this CIP.”
 - Suggest just showing these like the columns in table 1 -- otherwise confusing or seems to be obfuscating something.
- Pg. 14, Table 4 – Strategic programs – renewable energy and energy efficiency
 - Should have another heading that says 'Strategic Programs' (with font matching the above heading) ... otherwise this looks like it's part of the above 'Community responsive grants' ... but then the numbers don't match up and it's confusing.
 - This confusing formatting issue (using a Table to start what is essentially a new section) exists throughout the document.