



**PORTLAND
CLEAN ENERGY
COMMUNITY BENEFITS
FUND**

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

Public comment from online survey

- 1. Comments**
- 2. Attachments**

ID	Stakeholder group you identify with most	Please provide any feedback you have for certain sections of the draft or upload a document.	Name	Organization / Business
2	Interested community member	<p>I think many of the programs detailed in the plan are good. I love the match requirements for SFD home energy retrofits and the rent stabilization for private MF housing. They leverage private investments and that's great. I LOVE the tree canopy investment. I really like the EV charger investment in underserved areas.</p> <p>I still think there is way too much squishy stuff and giveaways that there's no real CLEAN ENERGY FUND nexus to. I don't understand why "capacity building" for nonprofits will help us reduce our carbon footprint. I don't understand why green infrastructure gets less than 1% of the funding. The access to fair capital provision is well intentioned but it is entirely too vague to be serious.</p> <p>In general, I fear this is still way too focused on giving money to nonprofits. Disbursements will be determined by nonprofits. Nonprofits will receive funds. IDGAF about optics, I want results. I genuinely mean that I think this is worlds better than last year but it still needs</p>	I am a resident	None
3	Interested community member	More trees, please! 82nd Ave and schools are just a start. The need is great.	None	None
4	Representative of a nonprofit organization	The draft shows a pipeline of funding but does not give specifics on how you will implement services to the BIPOC community. How barriers will be removed and who you will partner with and authority you give culturally specific organizations.	George Carrillo	LatinoBuilt
5	Representative of a nonprofit organization	<p>Will there be any flexibility in the dollar allotments per category? What if there is much higher need in a particular category than the planners anticipated, and less need in another area? What if there are funds in a category that aren't being utilized for lack of applicants - can they be moved to a higher-demand category?</p> <p>If CIP planners are open to consider additional areas for impact, affordable reuse is a climate justice element that reduces new material extraction and production and provides carbon-neutral access to needed materials. Often, funding is the only limiting factor for nonprofit reuse organizations that are seeking to scale operations to provide even more free or affordable reclaimed materials to more people who need them. Making energy use clean is imperative; reuse reduces energy use and material extraction. We need both.</p>	Jackie Kirouac-Fram	ReBuilding Center
6	Representative of a nonprofit organization	Focus more resource on downtown Portland where empty buildings are a big problem and a great opportunity to focus some of these funds. Speed up the spending to better match revenues	Eric Farley	Board Member Downtown Clean & Safe

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7	Interested community member	None	Rich Gozenya	City of Portland
8	Interested community member	What about pilot programs that support change on Portland streets or Parks ?? There doesn't appear to be a way to introduce and test new ideas to reduce fear, encourage acceptance, validate good ideas, and invest in success. Change for some is difficult; others want it right away. Pilot and demonstration projects satisfy both of these audiences. Ideas can be quickly implemented and evaluated. If the work, then they can be made permanent. if they don't then they can be modified or removed.	Max	None
9	Representative of a nonprofit organization	While providing a solid well-written overview of the outcomes desired in a city's Climate Action Plan, I was hoping for a document with more specifics. While the desired outcomes are easily understood, some background on potential approaches, techniques, technologies, and planning processes employed by organizations, governments, and other entities would aid in comprehension. Also referencing other potential models from the work of others in this area. i.e. NGOs like the Rocky Mtn. Institute, WRI, or examples from the US DOE Clean Cities Coalition would be useful.	Thor Hinckley	Third Act Oregon
10	Interested community member	I would like to see incentives such as the e-bike rebate be made available (on a scale) for all residents. A higher rebate for qualified low-income folks but then also something for middle-income folks. The cost of an e-bike is a (smaller) barrier for them as well and feel like some ranges could be established. I would also like to see more incentives for youth to adopt other transportation options apart from driving. Money for transit passes for middle/high-schoolers and more safe routes to school programming like the bike bus.	None	None

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11	Prefer not to answer	Why no reference to what went wrong in the past--we know that there was an excess of funds, and a mismatch with the program designed to give those funds out? These plans seem small compared to the amount of funds available. The strategy clings to the original way that PCEF was set up, despite that not resulting in the desired impacts. What was considered, that will result in real transformational change for Portland? How can we invest this money to create systemic change that will lead to carbon reduction and community resilience? The jobs/workforce section seems to be nearing that, but it is not targeted or ambitious enough. Renewable energy and energy efficiency goals should be bigger, aiming at just transition. Let's create community/neighborhood-renewable energy solutions, with back up power. Let's create off-grid resilient community centers that provide services to the people most impacted by climate change.	None	None
12	Interested community member	None	None	None
13	Representative of a nonprofit organization	It is unclear how existing naturally occurring affordable housing will get funding for retrofits, like new windows. Experts agree that adding new solar panels to an older building is basically a waste of money when the buildings, themselves, need weatherization upgrades. It is essential that we invest in existing non-regulated affordable housing if we want equitable outcomes. These investments reduce displacement, reduce construction waste (as compared to tear down and rebuild), improve indoor air quality, are less expensive than new construction, and reduce greenhouse emissions for heating and cooling.	Terri Preeg Riggsby	HAKI Community Organization
14	Interested community member	I think everything in this document is well thought out to maximize funding to meet climate goals. I particularly like the transportation initiatives. I use the bike town for all program and I have personally made a noticable reduction in my vehicle miles traveled. So I support investing in e-bike accessibility and believe it can be a real game changer in changing transportation in our city	None	None
15	Interested community member	Need to focus on the types of investment in reducing emissions that aren't covered by other funding types (utility, state, federal) to get the best overall reductions of GHG and reach people and communities that those other funding types might be overlooking.	None	None
16	Interested community member	None	None	None

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17	Interested community member	It is not clear that the committee focused on actions which will quickly and most effectively impact climate change, but is funding all possible ideas. I don't believe a focus in e-bikes will result in much CO2 reduction. I don't agree with providing credits to Uber or Lyft as a climate change initiative. \$19M for urban farming, which will provide an inconsequential portion of our food supply and competes with the need for land for housing seems misguided.	None	None
18	Interested community member	I appreciate your interest in ebikes and scooters but don't leave out eskate boards and electric unicycles. These devices, while demanding more skill, are more efficient than bikes or scooters. Electric unicycles, or EUC, are particularly efficient as they rarely require maintenance and are incredibly versatile. Myself and many others use EUC as daily drivers and commute solutions. No parking or fuel required.	Mark D Bentz	Oregon Department of Environmental Quality
19	Interested community member	Why the emphasis on employers and not workforce?? Worker equity is as important as - maybe more important than - employer equity.	None	None
20	Interested community member	Spending this much money on these types of projects is insane. Look at all the other problems and needs of ALL of Oregon. Get ALL of Oregon's input on how our tax dollars should be spent.	None	None
21	Interested community member	Simplify documentation required.	None	None
22	Interested community member	None	None	None
23	Representative of a nonprofit organization	Really appreciate the range of strategies/approaches/funding pathways. Also unclear at this point how to prioritize various initiatives/projects that our nonprofit may undertake. In numerous cases, it seems like the same activity could qualify for several different categories.	Kakumyo Lowe-Charde	Dharma Rain Zen Center

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24	Interested community member	First, significant funding should be dedicated to the existing stock of regulated affordable housing. Many affordable units are heated with expensive electric resistance heat and have no air conditioning. Second, instead of giving money to owners of unregulated affordable housing, equity from PCEF paired with other investors' resources could form a public purpose real estate investment trust or similar to acquire, rehab and make naturally occurring affordable housing permanently affordable. Third, time of use rates provide a powerful financial incentive for building owners to install batteries to shift when they buy power to low demand periods. Investing in building a "virtual power plant" would be a win, win, win, win, win, win strategy for PCEF: all buildings can install batteries (unlike solar), lower carbon emissions by reducing peak demand, lower costs and greater resiliency for all, PCEF priority populations could be funded first and PCEF provides a road map for others!	Marshall Runkel	None
25	Interested community member	These taxes were approved by voters to invest in "true" "clean energy projects. Not silly pet activists projects. For example, right in Beaverton, Oregon, we have NuScale , which is designing and building small form factor (SFF) reactors. A SFF reactor, paid for by the city, could provide essentially "free" clean power for decades to the City. nuscalepower.com If this team, and this tax don't want to look like a continuation of tossing good money after nothing burger solutions, do what is on this draft. If you really have interest in reducing carbon, you will need to be bold. What I see here is complete and utter "weak sauce". Be bold, spend this money on a study of implementing a SFF reactor which would provide free power to the people.	Concerned Citizen	None
26	Interested community member	None	Rarity Wang	Ahsc
27	Interested community member	Thank you for sharing this information with us, I really benefited from attending this meeting. It would be amazing if you could host more meetings like this.	Buthainah Al-Zubaidi	None
28	Interested community member	-Investing in reusable industry - For immigrants how is new and have a very little information or no information at all, I recommend lectures in their mother-language to be apart of projects, and be aware of the importance of clear energy.	Shams	None
29	Interested community member	There is a shortage of solar installers. Many projects are backed up for months and some change their minds. How will this be addressed? Is it possible to come forward with a plan to train a workforce of installers, particularly disadvantaged citizens? Would a grant be available?	David Kmetovic	Rex Dexter, LLC

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30	Prefer not to answer	None	None	None
31	Representative of a nonprofit organization	None	Leslie Pohl-Kosbau	Friends of Portland Community Gardens
32	Interested business owner	None	Peg Butler	Peg Butler LLC
33	Interested community member	<p>I think there needs to be some sort of mechanism in the flexible access to capital section to invest in low-income Portlanders' ability to contribute to the green tech sector specifically via intellectual property rights. The average provisional patent costs over \$2,000 to file, and generally far more.</p> <p>I can personally say that I am sitting on four green energy/green agriculture tech designs that may never see the light of day simply because I can't afford the first step in the R&D process as a low income, disabled person. It's going to take awhile to save up enough to even consider beginning the process on just one of them.</p> <p>This is an area where grants to launch the earliest phases of green tech could fall under flexible capital and potentially bring exponential returns back into the community if even a few of the grant-funded patents turn out to be successful, paying BACK into the program while benefitting disadvantaged communities financially and through carbon mitigation.</p>	Layla Schubert	Corner of The Eye
34	Representative of a nonprofit organization	I am particularly interested in increasing the clean energy and capacity building focus.	ROGER L WOHL	Oregon Rail Heritage Foundation

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35	Interested community member	<p>The plan is discriminatory by prioritizing some people over others. The pursuit of "equitable outcomes" is a not so veiled attempt to address race issues which is divisive. Chief Justice Roberts said that to stop discrimination we must stop discriminatory acts such as the CIP plan.</p> <p>Focus instead on what unites us which the climate. Equitable outcomes will never be achieved because people are humans and honorably different.</p> <p>Focus please.</p>	None	None
36	Interested community member	<p>Proposal feels hastily put-together, with balloon non-specific "big ideas" to mollify those of us interested in clean energy initiatives in our neighborhoods. It feels like it is generally kicking the can down the road and typical of the "catch-up" behavior of Portland's City government which after all this time is now bursting with activity close to the end of Wheeler's tenure. Specifically, the proposal does not mention that Portland, Oregon and surrounds do not possess the electrical infrastructure to make these sorts of changes within the given timelines. Incentives to purchase electric cars do not work if there is no home or neighborhood facility to charge those cars. I propose looking at available spaces on high traveled courseways, such as the vacant 7-11 at the corner of Lombard and Wall (Lombard is Highway 30, btw), to build community/neighborhood charging stations. Local gas stations with electricity. I heat my home with gas, a godsend during power outages several yrs ago.</p>	Kim Spir	None

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37	Interested community member	<p>Generally impressed with the shift away from planning grants to on-the-ground projects and the adoption of measurements of success. Very impressed by the recognition that there should be transportation investments. One note: there is one \$35 million pot, some of which could go to charging stations, and another pot, \$35 million of which is to go toward financing electric vehicles. Since the absence of charging stations prevents people from buying electric cars, there needs to be a comprehensive plan integrating those two things -- identifying places where charging stations are needed and there is a potential market for electric cars, and being able to tell people you are offering financing for cars that there are charging stations, including neighborhood fast charging for people in multifamily housing who may not be able to charge at home.</p> <p>We don't see specific mechanisms and funding for evaluations and auditing: that needs to be part of the plan - can't be an afterthought.</p>	Steve Novick	None
38	Interested community member	<p>This is a solid, thoughtful plan. I had three thoughts overall:</p> <ol style="list-style-type: none"> 1. Are there places to leverage efforts across strategies or across City agencies with complementary strategies? For example, could work-based learning or pre/registered apprenticeship participants do some of the jobs that will result from the small business, multifamily, or neighborhood projects? I bet you are already thinking about this, but just in case...In another example, could the canopy or greenspace work occur with Parks? 2. Could we look for areas to leverage group-based mitigation or energy transition efforts in the commercial/small biz strategy? In the same way that Block-by-Block strategies are employed in residential areas? 3. Could the grants/contracts encourage the use of local (or regional), ESG suppliers (maybe even providing a list? match-making services?) so that each dollar gets leveraged for pro-social/environmental benefits? 	Kristin Wolff	SPR/thinkers+doers

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39	Interested community member	<p>I am aware that a Mitigation Banking System has been discussed by the City. Such a system seems to help achieve the goals identified by PCEF. My understanding is that this system was considered by PCEF but not adopted. I am almost 75 years old and have lived in Portland my entire life. I have been heartbroken by developments in our city during the last 30 years as the Climate Crisis has escalated. Further, the City has grown so much that it has become nearly impossible to manage. Measure 26-228 provided a framework to improve City Government. PCEF has done an exceptional job of defining improvements as well. Why not work hand in hand with the City as its structure changes? Adopting a Mitigation Banking System seems to be a way to work with the City to achieve PCEF's goals. PLEASE reconsider adopting this system.</p>	Babs Vanelli	None
40	Interested community member	<p>A good draft. However there is no specific focus on decarbonizing small lawn care and landscape equipment, including gas leaf blowers (GLBs). Recent tests by California's state Air Resources Board (CARB) estimated that one hour of GLB use emits as much smog-forming pollution as driving a 2017 Toyota Camry 1,100 miles. People most impacted on the ground are workers who are typically members of frontline communities.</p> <p>For the next CIP draft, please include language that invites PCEF applications for programs that help fund incentives to help small BIPOC owned lawn care and landscape companies transition from gas powered gas leaf blowers to electric models. Thank you.</p> <p>For information about the benefits of phasing out GLBs, please visit https://www.quietcleanpdx.org/</p>	michael hall	Quiet Clean PDX - To eliminate gas leaf blowers
41	Representative of a nonprofit organization	Add Frog Ferry as a strategy in the plan.	Scott Hatley	None

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42	Representative of a nonprofit organization	<ul style="list-style-type: none"> - Glad to see specific callouts for assistance at unregulated and single-family homes that truly support properties in need and support remaining-in-place (rent freezes & owner occupancy). - The \$200K for building feasibility studies prior to \$30M in investment seems disproportionately low for the need. Also, what about nontraditional facilities used extensively by the public during climate crises? Houseless rest areas, parks, bus & MAX stops? - If we are looking at sustainability x transportation, let's also look at sustainability x planning and the current building code. Perhaps something inspired by Seattle Green Factor. - Love the e-bike program. How can we de-incentive cars for local trips? - The green infrastructure is good but will only get us so far. A greater impact would be a street tree policy and collective efforts to prevent chopping up street trees in favor of power lines. - As a sustainability nonprofit, we desperately need the boring "overhead" support. 	Kristin Leiber	Lloyd EcoDistrict
43	Interested community member	None	Rachel	None
44	Representative of a nonprofit organization	I'm not clear about the funding categories in "climate jobs, workforce development and contractor support." Is the tree canopy program under this heading regarding workforce development tied to tree canopy work? Is this supposed to be on the job training funds in each of the categories?	Angela Crowley-Koch	OSSIA
45	Interested community member	Very excited by the potential e-bike rebate program and Transportation Wallet expansion. Both of these have the potential to help get people out of cars and reduce VMT/GHG that make our streets safer and more sustainable. Additional considerations should include expansion of bike infrastructure to help accommodate more people and more types of people biking further distances on e-bikes. Additionally, given transportation is 42% of emissions, and seeing the most stagnant emissions reductions, more funding should be allocated to transportation decarbonization investments to help accelerate the path to net zero, especially given the importance of near-term reductions in addressing climate impacts.	None	None

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46	Interested community member	<p>The CIP is very thorough, informative, and progressive. I appreciate the distinct categories for spending and the comprehensive approach to climate resilience.</p> <p>My two questions are:</p> <p>1. How would rent stabilization be enforced for renters who accessed energy efficiency upgrade programs? I am thankful the CIP recognizes that upgrades may cause unintended harm for renters but I am confused as to who would support renters if landlords violated the agreements.</p> <p>2. For organizations and buildings that chose to apply for funds to create severe weather shelters, would they also receive additional funding from PCEF to staff and maintain these buildings? While the investment from PCEF to create additional spaces for Portlanders during extreme weather events is important, I wonder if organizations would have a the ongoing support needed to maintain these facilities.</p>	Lilah Toland	None
47	Interested community member	None	None	None
48	Interested community member	Equitable outcomes could be improved by creating a matrix that shows an areas need - example - PBOT equity matrix. This could guide non profits and help in decision making on funding projects if a score was given to communities and then added to the final grant decision score.	Lynn Felton	Argay Terrace Neighborhood Association

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49	Representative of a nonprofit organization	<p>1) Insist that city proposed strategic program and allocations have broader community hearings, input and oversight prior to becoming part of plans.</p> <p>2) Both transportation and housing contribute equally to climate emissions but there is a huge inequity in funding between them. Workshops held before Trimet announced proposed increased fares. To promote equitable transit and emission reductions, PCEF funds should go to cover PCEF priority populations paying no fares instead of the more individualized Transportation wallet. We have to reduce emissions in half by 2030 so waiting 5 years not an option. Provide positive, climate justice major impact.</p> <p>3) There should be no methane in new constructions and begin phase-outs for indoor health and climate.</p> <p>4) Tree canopy funds should include protection and maintenance of old giants on public property in shade deficient areas with narrow right of ways as they are a community resource to be protected.</p> <p>5) More funding for community agriculture.</p>	None	None
50	Representative of a nonprofit organization	<p>Transportation:</p> <ul style="list-style-type: none"> -In the community responsive grants: Not calling out paratransit or other mobility options specified to disabled community needs -Equitable clean transportation access: should not include money for TNC as this does not decrease GHG emissions -Equitable clean transportation access: A portion of these funds should be used to fund something more transformative such as free summer transit for anyone to see how this helps transit dependent riders and reduce congestion, improve safety - this can then be used as reasoning to subsidize transit <p>Green Infrastructure:</p> <ul style="list-style-type: none"> -Should allow flexibility to fund pervious pavement/removing impervious pavement, bioswales, etc. to create more green space, reduce heat islands and replenish/filter ground 	Victoria Paykar	Climate Solutions
51	Interested community member	None	None	None
52	Government	None	Shalynn Robinette	Home Forward (Housing Authority of Portland)

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53	Representative of a nonprofit organization	<p>1. Why does the transpo decarb call for \$100 million over five years, but the amounts add up to \$81,100,000?</p> <p>2. Spending on transpo decarb leans heavily on programs. We know people don't ride bikes/walk b/c they don't have safe routes. I would be thrilled if this program partnered w/ PBOT to complete the most critical sidewalk infrastructure near schools, or install diverters near parks, or fundamentally enhance a few key greenways that serve target populations.</p> <p>3. "Overcoming barriers to to accessing clean transpo" is wildly vague</p> <p>4. Appears to be little reference to what has the biggest bang for the buck. What do experts in the transportation field say will have the biggest impact?</p> <p>5. The less money on charging infra the better</p> <p>6. Are there safeguards so that unused transpo wallet credits don't go to big corporations? They should only be billed to the program when used, otherwise this is a massive transfer of dollars to groups like Uber/Lyft just to buy (potentially unused) credits</p>	None	None
54	Government	<p>Strategic program 3: disabled Portlanders own their own homes at a much lower rate than nondisabled community members. Due to current policy around disability and benefits, individuals are restricted in the amount of liquid revenue, savings, and equity they can maintain while still receiving benefits, thus taking on energy efficient upgrades on their own is an often insurmountable ask. Is there room in the plan to factor in disability for higher investment even if they rent or live in owner-occupied home but potentially exceed the <80% AMI?</p> <p>Strategic Program 5: Improving accessibility is caveated under "additional eligible expenses" rather than a first string priority. The Housing Bureau's 2022 State of Housing report has 26% of those in their regulated units reporting a disability and the 2023 Disability Equity and Engagement Survey findings showed over half of disabled Portlanders have a mobility disability and the majority of whom use a power wheelchair.</p>	Brie Scrivner	None
55	Interested community member	The \$5,000 micro grants look like vote buying graft. \$5,000 does not buy much these days, it looks to me like a payoff to keep the "losers" of grants quiet. The funding of grants takes way to long There should be a goal of quarterly funding How do you train someone and then lay them off because you are waiting on a new grant?	None	None

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56	Interested community member	<p>I'm concerned that the PCEF is somehow a slush fund for proposals, vetted by inexperienced and unqualified volunteers. The climate emergency is upon us, and we should commend ourselves for permitting up to \$750M to this effort.</p> <p>But like many issues in PDX, we again seem to be recreating the wheel while allowing broad and uneducated voices to shape the program. Why?</p> <p>Deep, meaningful resources by reputable scientists and advocacy groups exist. We know what is needed most, soonest and how to deliver these KPIs. Transportation is #1, electrification rapidly along with reducing VMT (remote work, fewer kids activity trips are low hanging fruit). Next is reduced meat consumption. Heat pumps, insulation and retrofits.</p> <p>There is scant data on the actual carbon sequestration, the role of regen ag. You have too many cooks in the kitchen, with too much money and little guidance/oversight as the audit showed. We don't have time to waste this money.</p>	Michael Owens MD	None
57	Interested community member	<p>Directing any public funds to EV charging is misguided on many levels. It is inherently classist. EVs are expensive by any standard and are out of reach for average or low-income citizens. This is ultimately a subsidy to the hugely profitable and arguably irresponsible Auto Industry (spending untold dollars on irresponsible advertising that glorifies speed and excessively large and polluting vehicles). Directing money to alt, active and public transport will do MORE for the climate by getting polluting vehicles off the road FASTER and is far more equitable. Moreover, while EVs are touted as clean and green the environmental destruction that will ensue for minerals (the McDermitt Lithium mine is prime sage grouse habitat) is heartbraking. We need basics first, like sidewalks. partner with PBOT to invest in pedestrian infrastructure near schools and parks. Missing sidewalks are especially prevalent in east Portland.</p>	Sarah Risser	None

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58	Interested community member	I believe the proposed funding allocations for climate jobs and workforce development is too narrow in scope because it leaves out BIPOC folks working in professional jobs beyond contractors. Too often, BIPOC are relegated to labor-related jobs or "community engagement" positions within organizations working to address climate issues. We need more BIPOC in leadership and decision-making roles in the fields of conservation, environmental stewardship, climate action, transportation, housing, infrastructure, etc. We need BIPOC making policies and investment decisions. I appreciate the focus on exposing BIPOC youth to climate careers...but I'd like to see some funding going toward supporting professional and leadership development efforts aimed at recruitment, retention and advancement of BIPOC all along the career spectrum, not just youth and not just trade sector jobs. Please expand this category to be more inclusive of the depth and breadth of climate jobs needed to achieve our goals.	None	None
59	Interested community member	One of the biggest challenges to having a cleaning city and fighting climate change is getting our transportation clean. And that really means getting cars off the road since the EV scale up is still pretty slow. So any emphasis in which we would focus on that will have long reaching approaches. How and where are we using our waterways to get folks around like other cities on waterways do. (See NYC, Seattle, etc)	Adam Nashban	None
60	Representative of a nonprofit organization	The Cascadia Earthquake is anticipated to flatten bridges and isolate North Portland. A public/private ferry system would allow 1st responders in and out. Lives could be saved. Inner city youth would have access to the wonder of water transportation. The river would become a living part of the City.	Douglas Larson	Portland Harbor Community Advisory Group
61	Government	Port of Portland comments are provided in the attached PDF.	Alexandra Howard	Port of Portland, Oregon
62	None	Please see attached.	None	Evergreen Consulting Group
63	Interested business owner	Support Frog Ferry as part of your transportation decarbonization efforts.	Bill Davis	BeachNecessities.com

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64	Interested community member	I would like to make use of this space to suggest we give city funds to the program that's called Frog Ferry. I'm an advocate for shifting the modal share away from private vehicles and towards more sustainable means of mobility, these include non motorized means and public transportation like the project Frog Ferry. Some of my neighbors who are in wheelchairs have a hard time getting up the cathedral park hill, getting up that hill is the only way to access the TriMet network, we need a transportation option that can be accessed directly from the bottom of the hill like the Frog Ferry proposal. Their proposal includes the use of biofuels and eventually shift towards full electric.	Juan Carlos VildÃ³sola Covarrubias	None
65	Representative of a nonprofit organization	Car use and the transportation sector is the biggest source of GHG emissions in our state. In order to effectively combat this, we need to dis-incentivize car use and incentivize transit use. I think that this plan should be dedicating funding to expanding mass transit, and subsidizing fares completely so that taking transit is not only more accessible, but a realistic and better alternative mode of transportation that cars. I think that PCEF needs to be working directly with TriMet to implement funding, instead of relying on PBOT and the transportation wallet program.	Ellie Gluhosky	OPAL Environmental Justice Oregon
66	Interested community member	The allocation toward the single family household energy efficiency upgrades are far too high. Portland needs to densify in order to efficiently house the people in this region. Investing in improving the energy efficiency of single family homes above multifamily homes bakes in investments in an inefficient type of housing unit. The money could be better invested by upgrading efficiency on multifamily homes and ideally I'd like to see the investment flipped (multifamily invested at the rate of single family and vise versa)	Paxton Rothwell	None
67	Interested community member	None	Judy Ringenson	None
68	Interested community member	None	Sorin Garber	Sorin Garber & Associates
69	Representative of a nonprofit organization	see attached document	Benedikt Springer	None

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70	Interested community member	<p>Re: Frog Ferry:</p> <p>I live in Linnton and we welcome a service such as Frog Ferry that could help to revitalize our waterfront. It may also contribute to our being resilient in a disaster--we need ALL the help we can get.</p> <p>Connecting folks to the river and increasing awareness of the environment will be a positive step.</p> <p>Climate change needs everyone to step up and promote electrification.</p> <p>Thank you,</p> <p>Nancy Hiser</p>	Nancy Hiser	Linnton Neighborhood Association, Environmental Committee
71	Representative of a nonprofit organization	Thank you for seeking feedback, please see attached document.	Colleen Dixon	Zenger Farm
72	Interested community member	<p>Maintain ongoing communication with stakeholders. This takes time and money but results in the best possible decisions and outcomes. Make certain that innovative ideas are given genuine consideration and not discarded out-of-hand.</p> <p>In the category of innovation, a bike/ped electric ferry system is ready to launch its pilot program from Cathedral Park to the South Waterfront to test drive its bigger plan to serve communities from Oregon City to Vancouver, WA. San Francisco, Seattle, and Vancouver, BC plus numerous river cities have well established ferry transportation systems. Here in the Metro region, our river waterways are offering the same opportunity for a public transportation mode that doesn't require the huge carbon footprint of road building, that saves on CO2 emissions by being electric, and that provides transportation to the public, thereby reducing traffic and additional CO2 emissions.</p>	Anatta Blackmarr	None
73	Interested community member	I think that the document could have been easier to read and digest, with more visual variety. I appreciated the extensive information on all of the hopes for this program, and I hope that everything this proposal plans comes to fruition.	Lucita Ocaña Dessen	None

ID	Stakeholder group you identify with most	Please provide any feedback you have for certain sections of the draft or upload a document.	Name	Organization / Business
74	Prefer not to answer	None	Dana Weintraub	None
75	Interested community member	None	Laura Feldman	None
76	Interested community member	None	None	None
77	Interested business owner	<p>Attached is a letter detailing the following four recommendations:</p> <p>1)Expand the scope of SP4 to include an alternative funding mechanism to ensure small commercial participants benefit from reduced utility spend.</p> <p>2)Increase the budget allocation towards SP4: Clean energy in small commercial buildings.</p> <p>3)Add clarity to the building owner match requirement of SP4.</p> <p>4)Consider how SP11 may be combined with SP4 for operational efficiencies.</p> <p>Thank you for considering our recommendations.</p>	Jacob James	Burch Energy
78	Interested business owner	None	David Burchfield	Burch Energy Services Inc.
79	Representative of a nonprofit organization	See attached letter	Charity Fain	Community Energy Project
80	Interested community member	Please consider funding Frog Ferry as a priority of your transportation decarbonization goals -	Jessica Elkan	N/A
81	Interested community member	None	None	None
82	Interested community member	Be bold and innovate to build a better Portland. Include Frog Ferry in your fiscal year 2023/2024 budget.	Grace Blunck	None

ID	Stakeholder group you identify with most	Please provide any feedback you have for certain sections of the draft or upload a document.	Name	Organization / Business
83	other	<p>The CIP represents a significant commitment toward Clean Energy. To fulfill the objectives of the plan, it's important that attention is placed on meeting the equity goals identified within the plan. This work must be deliberate and purposeful to help ensure full access and participation of vulnerable communities. I believe these objectives must be more direct in wording and have measured outcomes related to engagement and subsequent participation to validate the effectiveness of efforts toward equity.</p> <p>There is also an opportunity to 'influence' large institutions to develop supply chain relationships with those local business that have participated in the CIP.</p>	Daryl Pierson	Portland State University
84	Representative of a nonprofit organization	<p>Please see attached document signed and endorsed from Willamette Falls Trust staff leadership, Board Executive Council, and Tribal Leadership Committee:</p> <p>Andrew Mason, Executive Director</p> <p>Robert Kentta, Board Chair Confederated Tribes of Siletz Indians, Cultural Resources Director</p> <p>Rev. Marianne Allison, Board Vice-Chair St. John the Baptist Episcopal Church</p> <p>Bill Dolan, Treasurer Senior Philanthropic Advisor, US Bank</p> <p>Aaron Barber-Strong, Secretary Political Coordinator, International Brotherhood of Electrical Workers</p> <p>Pam Knowles, Immediate Past Chair Consultant</p> <p>Davis â€œYellowashâ€ Washines, Tribal Leadership Committee Confederated Tribes and Bands of Yakama Nation Government Liaison, Yakama Nation Department of Natural Resources</p>	Katie Hutchinson	Willamette Falls Trust

ID	Stakeholder group you identify with most	Please provide any feedback you have for certain sections of the draft or upload a document.	Name	Organization / Business
85	Representative of a nonprofit organization	We feel like the allocation to green infrastructure and regenerative agriculture projects is a breach of trust, and is grossly inconsistent with the language which was approved by voters. From the very beginning of the public campaign to pass PCEF, the organizers and campaigners were explicit that 15% of the funds would be allocated to a combination of green infrastructure and urban / regenerative agriculture. The proposed CIP allocates 6.7% to trees and 2.5% to urban agriculture, which is an affront to the hard work of the individuals, nonprofits, and community groups which supported this historic effort- of which we are just one. This STINKS TO HIGH HEAVEN like the result lobbying and influence peddling by organized commercial industries - HVAC, construction, and solar vendors and contractors with the money and connections to change how this public money is spent. PLEASE avoid more embarrassing articles, costly lawsuits, and breach of public faith in government by keeping your word.	Adam Kohl	Outgrowing Hunger
86	Representative of a nonprofit organization	None	Alexa Diaz	Forth
87	Interested community member	I wish to see more investment in green transportation benefiting BIPOC community members. I wish to see a mechanism to maintain street trees in low-income neighborhoods utilizing PCEF funds. See my detailed comment letter submitted 3-30-2023.	Darlene Chirman	None
88	Representative of a nonprofit organization	I have attached my feedback as an attachment	None	None
89	Interested business owner	None	Marcelino Alvarez	Photon Marine
90	None	None	Hannah Cruz	Energy Trust of Oregon
91	Representative of a nonprofit organization	None	Hannah Cruz	Energy Trust of Oregon
92	Representative of a nonprofit organization	None	Sandra Jones	Metropolitan Family Service

ID	Stakeholder group you identify with most	Please provide any feedback you have for certain sections of the draft or upload a document.	Name	Organization / Business
93	Interested community member	I hope that there will be further exploration of how the infrastructure and expertise PSU offers could be more fully integrated into these investments to help them reach their full potential and maximum impact. There are opportunities to engage PSU as a central and strategic partner in these efforts, as it is well-positioned to support the City's just transition to a low-carbon and climate-resilient future. Specifically, PSU is well placed to play a role as a convener to engage diverse parties in information-sharing as well as serving as a validator of best practices and a place to share lessons learned. In addition, PSU "in partnership with Portland Community College and community-based organizations" PSU can help to grow the next generation of climate workforce needed to fully develop the climate economy and deliver on the region's climate goals. PSU's applied research programs "particularly those focused on climate and equity - can serve as an amplifier for the PCEF efforts.	Jennifer H Allen	Portland State University
94	Representative of a nonprofit organization	None	Ariadna Falcon Gonzalez	The Getting There Together Coalition, GTT
95	Interested community member	None	Clarence Edwards	None
96	Interested community member	The proposed Frog Ferry service will help decarbonize the regional transportation system and offer a viable alternative to Oregonians. Ferry services in other cities are reliable and highly utilized. Let's put our rivers to work to help move people efficiently.	Jill Eiland	N/A

PCEF Preliminary Draft - Attachments to Online Survey**Public Comment Period: March 15 - April 7, 2023**

ID	Stakeholder type	Organization	Contact Name
48	Representative of a nonprofit organization	Argay Terrace Neighborhood Association	Lynn Felton
52	Government	Home Forward	Shalynn Robinette
61	Government	Port of Portland	Alexandra Howard
62	NA	NA	NA
69	Representative of a nonprofit organization	None	Benedikt Springer
71	Representative of a nonprofit organization	Zenger Farm	Colleen Dixon
77	Interested business owner	Burch Energy	Jacob James
79	Representative of a nonprofit organization	Community Energy Project	Charity Fain
80	Interested community member	N/A	Jessica Elkan
84	Representative of a nonprofit organization	Willamette Falls Trust	Katie Hutchinson
86	Representative of a nonprofit organization	Forth	Alexa Diaz
88	Representative of a nonprofit organization	None	None
89	Interested business owner	Photon Marine	Marcelino Alvarez
92	Representative of a nonprofit organization	Metropolitan Family Service	Sandra Jones
94	Representative of a nonprofit organization	The Getting There Together Coalition, GTT	Ariadna Falcon Gonzalez
95	Interested community member	None	Clarence Edwards

PCEF - CIP

Living in Argay Terrace - a neighborhood that has the lowest tree canopy in the City of Portland, is bordered by I-84 and the Columbia South Shore industrial zone, has two freight warehouses being built and permitted - one a 90 bay warehouse at NE 138th in the industrial zone, the other a 37 bay freight warehouse abutting residences, and according to PSU Prof Shandas' heat study, being one of the hottest areas in the city during a heat dome event - I am looking for ways this plan helps our part of the city, Maywood, Parkrose, Argay Terrace, Wilkes. According to a 2019 Multnomah Co. poverty report our area has a higher incident of asthma. Our population demographics and environmental impacts from living in proximity to an industrial zone defines us as an environmental justice community according to the EPA. It is through this lens that I am looking at the plan.

1. Overall the plan is dependent on non profits with capacity being active in the area of town that needs help. In my knowledge there are very few non profits active in Argay, Wilkes beyond the NA's. There needs to be a mechanism where areas that have been identified as environmental justice communities, where the need has been identified, are targeted and prioritized by non profits. Communities that border Industrial zones which have the largest contributors to diesel particulate matter pollution - transportation - will be the last to be ameliorated - freight and garbage truck emissions, need to be given focus and targeted spending.

SP2) Prioritize/give focus to, multifamily residences along NE Sandy blvd from NE 122nd to NE 161st. For the most part the landlords of these properties only care about the rent check. They are not motivated in anyway to upgrade. These multifamily homes lie next to state hwy 30 - Sandy blvd - Union Pacific rail tracks, under the flight path to PDX and next door to Columbia South Shore industrial zone. The need is there, the motivation is not. In the Argay Terrace neighborhood - this census track in this census block according to the 2020 census is 62 percent people of color. I suspect the same demographics can be found in Wilkes neighborhood too east of NE 148th.

SP4) Small commercial buildings to include strip malls and tenants space within - example - NE 141st and Sandy blvd. Often these landlords do not live

in the community and are motivated by greatest profit not environmental concerns or community building. Give focus to tenants that border industrial zones that may not be represented by non profits.

SP6) SP7) Explore very limited bike infrastructure East of NE 122nd - Argay. Wilkes, Columbia South Shore industrial zone.. Presently I do not believe there is any e-bike stations in the area. For the numerous residents to the South of the industrial zone, clean transport to jobs in the industrial zone is limited. Sandy blvd is a deadly street (3 deaths of pedestrian and scooter rider in two years) crossings are limited, Tri met stops have limited shelter and no seating. Explore an intergovernmental agreement with ODOT to create equitable clean transportation access along this road. Sandy blvd is PBOT managed until 99th - it is Gresham managed from NE 161st. It is this stretch between 99th and 161st that is ODOT highway and the care and safety of it shows the difference between state and local management. Of course transportation decarbonization should be concentrated on in the industrial zone for freight traffic and garbage trucks. Exploration of the lack of bike lanes and green streets in these areas would be helpful. It appears from NE 122nd to NE 161st - North of I-84 to Marine Dr. is an ebike, green streets, bike lane (for the most part) free zone.

Green infrastructure :

There is an element of SP7) that is also in green infrastructure. We have a potential multi modal trail of the cross levee that runs between NE Sandy blvd and NE Marine drive that was approved by City council in 1993. It has never been built. Next to it is BES land and PP&R natural space. Completion of this trail would create a safer way for workers to get to the industrial zone, create much needed climate resilience for an overburdened community by opening access to green spaces, open up access to recreational activity, walking/kayaking to a traditionally marginalized community.

Explore funding an intergovernmental agreement for the greening of ODOT hwy 30. This is small but I know of no other neighborhood in Portland where this exists except in ours...a traditionally marginalized community. Bioswales - NE 122nd to NE 150th appx. Sandy blvd. These bioswales presently are only maintained once a year by ODOT. I have been told by ODOT there is no money for regular maintenance, regenerative planting and upkeep. This is basically a pissing match between PBOT and ODOT in which our neighborhood got left holding the moldy fig... uncared for bioswales at the entrance to our community where thousands of people drive by daily. It says this is a forgotten community. I am not asking for Kruse Way here, I am

asking that our neighborhood gets the same care as others and presently it does not when it comes to these bioswales. Can an intergovernmental agreement be explored and funded? I have been working a year and a half to get these to be something other than litter receptacles and at each turn it is someone else's problem. How can PCEF funding be used to solve this (minor) problem?

SP 9) can education and community building be added here. For example - the urban Grange Hall at NE 121st pl and Prescott Dr. It could be a powerful community connector and educator across from Parkrose HS and falls under agriculture.

SP 11/SP12: Can some money be carried over to NE 122nd? IF a ProLogis freight warehouse is built a block from the Parkrose HS athletic fields (which the community is hoping will not happen) but if it does, the diesel pollution from freight traffic will target one of the most diverse districts in the state of Oregon that already has been shown to have little climate resilience. Presently in the 25 million dollar funded NE 122nd plan there is nothing to improve safety or mitigate the diesel pollution this development will bring. Can an equitable corridor be created on NE 122nd particularly if the freight warehouse is permitted and funded through PCEF?



To Our Colleagues at PCEF,

Thank you for the opportunity to comment on the draft proposal for the Climate Investment Plan (CIP). As the largest provider of affordable housing in all of Oregon, we are excited to be a systems partner with the City of Portland in achieving major carbon-emissions reductions and build resilience in ways that benefit those most impacted by the climate crisis.

In keeping with our previous comments, we would like to reiterate the sentiment that **regulated multifamily affordable housing** should be the foundation of PCEF's housing-related carbon reduction strategies. The residents living in those properties are among the most impacted by climate injustice and deserve to be a priority recipient of the city's efforts to reach carbon neutral.

Three Funding Pathways

1. Community Responsive Grants

The draft CIP states that these grants will be awarded to community-based nonprofit organizations for projects that are led by, and serve, communities living on the frontlines of climate change. Based on meetings with PCEF staff, Home Forward was under the impression that this first funding pathway would be available to address energy upgrades to existing affordable multifamily housing. However, the language of the draft CIP does not appear to allow for the use of funds in this way. We encourage the language to be modified to allow for consideration of applications by affordable housing providers for holistic upgrades and improvements to existing housing portfolios.

2. Strategic Programs

Equity + Climate Framework

As outlined in the draft CIP, a strategic program concept must answer all four prompts affirmatively to be considered for inclusion in the CIP. The four prompts are: *benefits to frontline communities; implementation feasibility; climate impact; and accountability.*

Home Forward is an obvious choice as a Strategic Partner for PCEF.

While we are not a formal part of the city's government structure, we are an essential systems and jurisdictional partner that provides vital services throughout the City of Portland, as well as Multnomah County, the City of Gresham, and other communities in east Multnomah County. We work in collaboration and alignment with Portland, Multnomah County, and Gresham on housing policy and programs. In fact, each jurisdiction appoints commissioners to our Board of Commissioners, and the City of Portland maintains final approval of all applicants. We also maintain a formal liaison arrangement with the Commissioner that oversees the Portland Housing Bureau. We even take on responsibilities to administer programs on behalf of the State of Oregon. Ultimately, however, we are responsible to the citizens and taxpayers of our community to fulfill our mission.

We are still considered a housing authority under the Oregon law that governs us and by our largest funding source, the U.S. Department of Housing and Urban Development. We operate the largest federally funded housing programs in Oregon, which includes Housing Choice Voucher, Rental Assistance Demonstration (RAD), and Veterans Assisted Supportive Housing (VASH). However, we have moved far beyond the traditional role of a housing authority.

Accordingly, our work will certainly score well on the first, second, and fourth prompts above. Our ranking on the third prompt, GHG reduction outcomes, will largely depend on how PCEF is measuring emissions. For example, we consider how much greenhouse gas reduction comes from improving the envelopes of older properties, and whether proposed measurements include the materials, construction, and transportation impacts. Without full transparency on methodology and impact metrics, success on the third prompt is difficult to predict.

Regardless, there is significant data that supports the notion that rehabilitation of multifamily housing holds the biggest potential for greenhouse gas reductions of all types of housing. And there is a compelling reason why Home Forward should play a formal role as a Strategic Partner in the pursuit of PCEF goals.

Strategic Program 1: Clean Energy in Regulated Multifamily Affordable Housing

a. Definitions

For clarity and consistency, it is important that the CIP define the term “regulated multifamily affordable housing” We propose a broad definition of regulated housing that is consistent with State law (see, e.g., ORS 90.323(7)(b) and City code (see, e.g., PCC 30.01.085 Admin. Rules (IV)(H)) which ensures administrative consistency and oversight of eligible housing types. Our proposed definition of regulated multifamily affordable housing is “a home or dwelling unit that is regulated or certified as affordable housing by a federal, state, or local government entity.”

This definition overlaps and aligns with the target population prioritized by the CIP based on income level. Most regulated “affordable housing” is housing that caters to households earning 80% or less of Area Median Income (AMI), where rents are set at or below 80% of market rates. The LIHTC, OAHTC, HOME and other local, state, and federal programs operate to serve populations at or below the 80% AMI levels. HUD also defines affordable housing to require rents are “structured so that the targeted tenant population pays no more than 30% of their gross household income for rent and utilities.” HUD further defines “Moderate Income” to be at or below 80% AMI, “Low-Income” to be at or below 50% AMI, and “Extremely Low-Income” to be at or below 30% AMI.

As outlined above, regulated multifamily affordable housing is directly serving the populations that PCEF prioritizes based on income level. Furthermore, the proposed definition meets these commonly accepted and industry standard income level and rent-setting affordability regulations, while also ensuring other goals of regulated affordable housing including housing stability, safety and quality of housing types, long-term community ownership, and regulatory oversight, to name a few.

For these reasons, Home Forward proposes a clear definition that prioritizes alignment with existing statutory definitions and policy goals.

b. Eligibility

There are projects that fit neither the Phase 1 nor Phase 2 timing descriptions that nevertheless incurred significant additional costs due to PHB's Cooling Policy. All cooling - related measures implemented in response to PHB's Cooling Policy Statement of August 13, 2021, should be eligible for PCEF funding.

c. Implementation

Home Forward would like to draw attention to concerns around the implementation of grants under the first Strategic Program. Based on prior discussions with Portland Housing Bureau, we are under the understanding that, within the new construction context, these grants will be available to pay the cost increment between existing code and the PHB green building policy. If this is true, we would like to highlight the difficulty and lack of feasibility in demonstrating the appropriate grant amount based on cost differentiation.

For example, when we work with an Architectural/Engineering team we ask for a design that meets our up-front goals. It is not feasible to ask for a building design that meets reduced goals, in effect asking for two designs and two sets of numbers to allow a firm to bid on the project. Doing that work on the front end takes extra time, money, and staffing. Likewise, subcontractors who are asked to "bid this project two different ways" will likely not pursue the project because of the increased labor and costs for a job that they might not get, especially where it requires complex cost differential modeling. This approach, if it is even possible, would result in less competition and higher costs.

Our recommendation, based on extensive engagement in public contracting, is to set an amount of money per unit for new construction. For example, establishing \$50,000 per project that meets the Portland Housing Bureau Green Building standard would avoid the documentation of incremental costs, would improve the efficiency of this process, and would avoid delays and undue costs.

d. Focus on Preservation

Additionally, we would like to draw attention to the bias in this funding towards new construction. We recognize that rehabilitation of existing properties is not fully captured in PHB's Green Building Policy, which is geared towards new construction. However, investing in existing multifamily affordable housing does align with the local HEART standards currently in development and will provide a meaningful opportunity for providers to offset the costs associated with reaching these targets. PCEF has a great opportunity to increase their return on investment with this portion of the CIP. In fact, Home Forward has identified an immediate need for \$20 million in needed preservation projects that would meet PCEF eligibility and strategic goals.

Investments in the preservation of existing decades-old affordable housing will result in significant impact to greenhouse gas emissions. We recommend that CIP allocate an additional \$30 million specifically for energy efficiency measures in affordable housing preservation.

Strategic Program 2: Clean Energy in Unregulated Multifamily Affordable Housing

Home Forward would like to express concern regarding the amount of funding being directed towards unregulated affordable housing.

As mentioned in the draft CIP, efforts to reach what is referred to as “naturally occurring affordable housing” providers have largely been unsuccessful for a variety of reasons, with the most prominent being an unwillingness of those individuals to participate. Since a “25% match from property owner and a minimum three-year rent-stability agreement will be required” there exists little motivation for small, for-profit, unregulated property owners to participate in a project that requires money out of their pocket, gives them little return on investment especially when tenants often pay the costs of utilities associated with the units, and which removes their ability to increase their profits for three years.

OHCS just issued an [Request For Proposal](#) to try to move "naturally occurring affordable housing" out of private ownership and into the hands of housing authorities and CDCs. That NOFA specifically names "poor management" as one of two reasons that this type of housing exists; the other is market filtering.

We recommend a decrease in the amount of money in this Strategic Program from \$50m to \$10m. We also recommend that this amount be designated as a “pilot program” to better understand feasibility and implementation in the private market. If the funds remain underutilized – or utilized in such a way that this priority is cost- or outcome-prohibitive, funds can be reallocated back into other uses.

Strategic Program 3: Clean Energy Improvements in Single-Family Homes

From an equity perspective, Home Forward has serious concerns with PCEF prioritizing the largest dollar amount, and deepest energy retrofits, for predominately white, owner-occupied, single-family homes. We know that 74% of Black households, 62% of Indigenous households, and over half of other communities of color rent in Portland. In addition to those disparities, the median renter energy burden is 13% higher than that of the median owner.

This is an enormous amount of money for an effort that will require money to move out the door one house at a time. An average investment of \$50K per household would require 2,800 households to reach proposed goals. In short, given likely implementation difficulties, it will be very difficult to spend this amount of money in five years.

We encourage PCEF to reexamine the criteria used for determining the amount of money being invested into owner occupied homes versus regulated multifamily affordable housing based on the following:

- Of all income groups, affordable housing rental communities have the most to gain from decarbonization’s health benefits and energy savings; and
- Improving energy efficiency and electrifying housing are intertwined strategies for decarbonization. Cooling and electrification retrofits, must crucially include building shell efficiency upgrades to improve resident safety, reduce electrification installation and operating costs for customers, and minimize potential additional electric system supply costs. Securing adequate funding and financing is perhaps the biggest hurdle and most vital, particularly for retrofitting buildings.

We recommend that CIP significantly decrease this amount and re-purpose it to regulated multifamily affordable housing. As an industry, regulated multifamily affordable housing providers can move at scale, while meeting climate goals and serving communities of color.

Thank you for the opportunity to provide feedback on this very important opportunity. Home Forward applauds PCEF's work with the Climate Investment Plan, and we continue to extend an offer of support as a strategic partner in reaching the populations most affected by climate injustice.

If you have any questions about these comments, please contact me at Shalynn.Robinette@homeforward.org or (503) 936-9844.

Sincerely,

Shalynn Robinette

Environmental & Emergency Manager

Cc: Office of Commissioner Carmen Rubio



April 4, 2023

Via online comment submittal form

Subject: Port of Portland Comments on the PCEF Climate Investment Fund

Dear Portland Clean Energy Fund Team:

Thank you for the opportunity to review and comment on the PCEF Climate Investment Plan (CIP). The CIP is both comprehensive and accessible, and the Port is excited to see the City's work on PCEF evolve and continue to gain momentum and support. The Port particularly appreciates how the PCEF CIP clearly lays out what types of projects and actions are can funded, the high-level budget for each work area, and the desired outcomes and goal measures for each community responsive grant and strategic program category. This is helpful information for interested community members and applicants alike.

While the plan is clear with respect to the areas listed above—budget, outcome, and goal measures—Port staff noted that additional information on eligibility for roles and selection criteria might be helpful. Specifically, the Port raises the following issues:

- Balancing desired outcomes during the review process – The PCEF CIP states that all projects will need to affirmatively answer how a proposed action will: (1) create clear, significant, and measurable benefits for frontline communities; (2) be realistically implemented over five years; (3) result in meaningful and measurable GHG reductions/sequestration; and (4) have accountability mechanisms to ensure that communities of color, low-income populations, people with disabilities, and other vulnerable communities benefit from the strategic program, but it does not speak to how projects will be scored, and if any one criteria has a greater priority. Given that some proposals may score very high in one area, but much lower in another, the Port recommends providing more information on the guidance PCEF will use to balance and weigh desired benefits.
- Clarity on layered funding – Another area for clarification is whether PCEF funding can be used in conjunction with other public funding, such as state and federal grant awards, or other regional community grants. If so, and given the lengthy and varied review processes often associated with state and federal grants, would PCEF consider project-by-project amendments of performance timelines to meet non-PCEF grant requirements?

April 4, 2023

Page 2

- Public agency eligibility – Recent changes to PCEF rules made it possible for government entities to apply for funding to advance projects that meet defined PCEF objectives, but the PCEF CIP appears to provide limited opportunity for public agency participation, outside of named City bureaus, and Strategic program 14: Climate-friendly public schools. Public agencies have the potential to leverage resources that could magnify PCEF outcomes and/or could push significant improvements in reducing greenhouse gas emissions in areas that include high concentrations of PCEF priority populations. Please consider adding additional guidance for how public agencies can best participate in the PCEF process to maximize our contribution.

Opportunity to expand transportation decarbonization – The Transportation decarbonization funding category addresses critical needs, such as increasing access to cleaner transportation options like e-bikes and by providing transit passes and increasing mobility options; and importantly, it also provides funding for community-led planning to identify low-carbon and zero-carbon options that are best suited to meet community needs. However, this category could be improved by also addressing fleet conversion in employment areas and industries with high concentrations of PCEF priority populations, and/or that operate adjacent to areas with high concentrations of PCEF priority populations. As evidenced in Strategic program 14: Climate friendly public schools, which addresses the need to convert the school bus fleet to zero emission vehicles, PCEF understands the value of converting the transportation fleets used by PCEF priority populations every day.

This is also an area where the Port is doing work. Currently, the Port is working to convert the mostly diesel-powered airplane ground support equipment to an all-electric fleet by 2026, which is a change that will improve air quality for airfield workers and the adjacent areas. The Port is also evaluating options for converting its fleet of approximately 30 buses (this fleet provides transportation for both employees and passengers) to a zero emissions technology. PDX's bus fleet is one of PDX's largest sources of scope 1 (direct) greenhouse gas emissions. This change, along with the conversion of ground support equipment, will bring significant air quality benefits to people who work at PDX and who live and work in the adjacent airshed. These are two examples of beneficial fleet conversions, but there are likely many more similar opportunities to advance fleet conversions which would improve air quality for PCEF priority populations.

Sincerely,

Alexandra Howard
Senior Policy Program Manager



14845 SW MURRAY SCHOLLS DR.
SUITE 110, PMB #513
BEAVERTON, OR 97007-923

MEMO

TO: Wendy Koelfgen, Clean Energy Project Manager, Portland Clean Energy Fund
FROM: Charlotte Morrow, Sr. Program Manager
SUBJECT: Climate Investment Plan Open Comment
DATE: April 4, 2023

The Climate Investment Plan outlines ambitious and important goals to mitigate the impacts of climate change to residents that are most deeply affected. We recognize that these ambitions are worthwhile and also challenging to implement effectively. We have identified a number of gaps that could be addressed in the final plan:

- The plan as designed would require significant administrative resources to execute. It would benefit the plan to describe how the City will structure their staff and resources for implementation.
- A number of the strategic initiatives rely on participation of business owners and property owners. The plan identifies the barriers to participation for businesses but does not necessarily outline methods for removing barriers or provide business incentives.
- Many of the strategic plans rely on communities, governments or non-profits to shoulder the burden of applying for grants and implementing upgrades. Consider allowing firms that specialize in grant navigation and clean energy upgrades to manage grant applications and implementation on behalf of non-profits or allow consolidation of these efforts to support groups who may have very limited administrative resource. RFP applicant selection criteria should include successful track record of motivating front-line and commercial property stakeholders to invest in clean energy improvements.
- The strategic plans could benefit from details on oversight and quality assurance.
- The plan should include education and behavioral training for residents on clean energy and efficient upgrades. (For example, studies have shown that occupants will often turn the heat up when their heating bill is reduced, negating the savings.)

March 30, 2023

Public Comments, Portland Climate Investment Plan

To whom it may concern,

I am submitting these comments as a private citizen. However, I am the utility policy analyst for the Community Action Partnership of Oregon. Among other things, community action implements federal and state weatherization programs that offer no-cost comprehensive weatherization services to low-income households (funded by US DOE, ECHO, BPA). I have these comments based on my experience with these programs.

I will focus these comments specifically on areas for improvement – overall, this is a good plan, and I appreciate all the hard work that has gone into developing it.

Generally, I think the plan lacks an acknowledgment that most issues cannot be addressed through spending more money alone. Many of the proposed programs will be more effective or only effective if they are accompanied by regulatory changes. Hence, I would recommend each section to come with a policy action package – developed through the same community-driven process – that suggests specific policy changes to the Portland city council, and potentially makes recommendations to the Oregon state legislature. Admittedly, this approach comes with some risks for PCEF, involving it in more political controversy. However, if recommendations focus narrowly on enabling successful programs that reduce GHG emissions, that risk can be mitigated.

The issue of retrofitting rental properties, especially those occupied by low-income families provides a salient example. Landlords have little incentive to make their properties more energy efficient – not only for the commonly cited reasons but also because potential renters rarely price in energy expenses into their decision-making.¹ The simple reason is that they don't have the information. There is no standardized way for them to know which apartment is more or less efficient. To make the strategic programs aimed at rental properties more effective, one could consider making energy information about rental properties available. While this might still have little effect in a tight rental market, it would have the additional benefit of making it easier to know which houses are good candidates for PCEF programs. Furthermore, the information alone might provide a nudge to landlords to become proactive. The city of Portland could do just that by expanding its current Home Energy Score ordinance to rental properties on the market.²

¹ <https://doi.org/10.1016/j.enpol.2021.112458>

² Other cities have done so: <https://www.aceee.org/energy-equity-renters-policy-map>

I have some additional concerns regarding the Investments in energy efficiency and renewable energy that will be made through community-responsive grants and five strategic programs. Portland does not exist in a vacuum – there is a real danger that these investments might simply displace weatherization efforts from the metro region to the city of Portland. In the short run, contractors and supplies are fixed, meaning they will flow to the area with the highest prices. PCEF’s historic investments will be much larger than state-wide investments into low-income weatherization from state and federal dollars. PCEF programs will be able to pay much more, making it possible that providers outside the city boundaries will find it harder to continue their work because local contractors will flock to Portland. It is conceivable that raising prices will prevent more restrictive programs, like for instance those supported by the US Department of Energy, from working altogether.

Due to these concerns, the proposed climate jobs, workforce, and contractor development programs are especially crucial. Importantly, these programs must actually expand the number of available, qualified contractors. Programs need to do more than just introduce workers to weatherization and incentivize higher wages and diversity. They must actually help people create additional contracting businesses. Founding a business requires specialized knowledge, owning appropriate licenses, insurance, etc., as well as the ability to bear financial risks, all of which might be less likely to be present in environmental justice communities. I suggest that programs need to offer tangible support and resources in these areas.

Additionally, program rules for investment in energy efficiency should require some degree of coordination with already existing low-income weatherization programs in the metro area. PCEF should also consider how their efforts fit into ongoing state-wide coordination efforts. Even now, consumers find themselves in a confusing landscape of programs, incentives, and tax credits. It would be desirable for PCEF to work together with the Oregon Department of Energy, who might be developing a “one-stop shop” for energy efficiency upgrades if pending legislation is successful.³

How to target low-income renters is another issue area that is not sufficiently fleshed out in the Climate Investment Plan. This is maybe the crux of residential weatherization. Only about half of Portland households are homeowners.⁴ This number is not only much lower for Black and Latino communities, but for low-income households in general. In the Portland metro area, the homeownership rate below 80% of AMI is around 40%. In Portland, this number is likely to be even lower since some of the most affordable options, mobile home parks, are mostly located outside of the city boundaries. This suggests to us that 70% to 80% of investments in residential buildings should accrue to (low-income) rental properties.

³ HB 3166 (2023): <https://olis.oregonlegislature.gov/liz/2023R1/Measures/Overview/HB3166>

⁴ <https://www.portland.gov/sites/default/files/2021/2020-state-of-housing-in-portland-report.pdf>

I think that the current proposal is unlikely to achieve that. Landlords have little incentive to make energy efficiency improvements, otherwise, they would already be doing so. There are currently plenty of utility, state, and federal incentives available. Energy efficiency upgrades come with substantial time and risks for landlords, like researching rules and managing contractors. Furthermore, there is little evidence that energy efficiency upgrades allow landlords to collect more rent (and we don't want them to raise rents anyway). From that perspective, combining rent freezes with landlord contributions is illogical; it ensures that landlords have no incentive to participate. I do not generally advocate for landlord subsidies; however, these programs are unlikely to work if they require landlord contributions.⁵ Instead, we should look at free upgrades in low-income rentals as the cost of helping the families living there. Landlord contributions will more likely be successful if they remain in kind, like rent stabilization agreements or additional renter protections. In sum, landlord contributions, at least for low-income properties, should be taken out.

Additionally, I would suggest that goal measures include some indicators of cost-effectiveness, even if broad. I am aware that too strong of a focus on cost-effectiveness can prevent the delivery of necessary services to disadvantaged communities, a (true) argument often heard in the context of federal weatherization programs. At the same time, our resources are not limitless, so we need to make some comparisons of what approaches work better than others. There are real trade-offs on most issues, a fact the Climate Investment Plan does not recognize sufficiently. For instance, it might turn out that reaching certain properties housing low-income households is prohibitively expensive. In that case, it might make sense to split the goals: provide direct utility payment assistance to those households and invest in a project with large GHG emission savings.

The last concern relates to the delivery model of most proposed programs. There will be hundreds of governmental, non-profit, and for-profit entities involved. This creates serious monitoring and accountability challenges. I generally appreciate PCEF's approach to err on the side of less bureaucracy; this is a welcome change to the status quo of myriad rules and reporting requirements common in social service delivery. At the same time, the money needs to be spent effectively. Therefore, I urge a maximum amount of transparency that allows citizens to compare the amounts spent on direct benefits, program delivery, and administration.

Fragmentation of service delivery creates specific challenges for low-income households. Sophisticated customers with time on their hands can research dozens of programs to find the one that might benefit them the most. For many reasons, low-income households are unlikely to be able to be that proactive. When you are juggling multiple bills without sufficient funds while working to the best of your ability, it is unlikely that you have the patience or capacity to learn about energy efficiency

⁵ <https://pubmed.ncbi.nlm.nih.gov/27053828/>

upgrades. To us, this suggests that the Climate Investment Plan needs to include a central information and outreach entity that can inform low-income households and help them determine which one of the myriad programs is best suited to them. Furthermore, this will also ensure that clients will be served with equal likelihood. In the world of eviction prevention, it is an open secret that getting help by calling 211 is very difficult – your best chance to receive assistance is to be already a client of a non-profit that happens to receive eviction prevention funds. A situation like that must be avoided. It is important that PCEF as a central coordinating agency reduce fragmentation, siloing, and duplicative efforts.

Thank you for your consideration,

A handwritten signature in black ink that reads "B. Springer". The signature is fluid and cursive, with the first name "B." and the last name "Springer" clearly distinguishable.

Benedikt Springer

Bene.springer@gmail.com

Climate Investment Plan Feedback - Zenger Farm

- Appreciation for the comprehensive plan and associated sessions designed to increase community understanding.
- It would have been great to have a session for regenerative agriculture stakeholders. There is an overall reduction in funding for regenerative agriculture. The plan supports newly acquired land as the metric for success, whereas continued land stewardship is equally as important yet seemingly unfundable.
- Noting that this plan seems to create an overall shift from funding community led solutions to more government/institutional funding.
- Presting plan numbers as a 5-year total makes it difficult to understand and compare the shifts in funding. Would be great to have it broken down into single years as well.
- Lack of transparency around how allocation of funding is happening. Immense amount of funds moved to growing an equitable tree canopy and energy upgrades in multifamily housing. How was this decided? Is it based on best scientific strategies for carbon reduction? Industries who advocated city council the hardest?
- This plan approach really incentivizes new projects and organizations. Would be great to invest in funding historically competent organizations by providing general operating support for historically competent organizations that would allow for spaciousness to dream and strategize together.
 - Please ask grantees who else is doing this work and how they are working together. So many new projects without overarching alignment or connection
 - See and appreciate the attempt to address this through the CBO capacity building program and looking forward to learning more about what types/sizes of CBOs that will serve.
- Youth Career Exposure (page 13) is only 4 million over 5 years, for all the career pathways this feels like too little funding, and that there ought to be closer to 2 million a year, 10 million total to support the many organizations already doing this work, and emerging organizations looking to support this work. This career exposure work ought to be earlier than 5th grade and support K-12 grade experiences/exposures.
- Portland needs more funding for workforce development. The plan allocations are too little, less than what previously was allocated and even at that level didn't fund all the aligned/priority projects.



Dear PCEF CIP Committee,

Burch Energy is a minority-owned B-Corp whose mission is parallel to that of PCEF: to normalize racial inclusivity in the clean energy economy while mitigating the effects of climate change. We are experts in energy efficiency and building science, and on the leading edge of environmental justice and clean technology revolution. We have lived-experience as a small commercial business facing the split-incentive dilemma.

First and foremost, PCEF should be applauded for their excellent work compiling community voices into a cohesive plan. No small undertaking, and fine results.

Secondly, PCEF has likely considered in depth what makes this program special among its peers. To levelset with our own understanding- we have witnessed that while most energy programs offer lighting/HVAC/appliance rebates and technical assistance, they are limited by cost-effectiveness parameters, prohibited from promoting fuel-switching, and driven by the need to ultimately benefit the utility business. In contrast, PCEF can focus on previously untenable noble objectives, such as GHG reduction and fuel-switching. We encourage PCEF to lean into their distinct advantages.

Building on this alignment, and from our review of the draft CIP, we have four recommendations, centered on our area of expertise, small commercial businesses:

- 1) Expand the scope of SP4 to include an alternative funding mechanism to ensure small commercial participants benefit from reduced utility spend.
- 2) Increase the budget allocation towards SP4: Clean energy in small commercial buildings.
- 3) Add clarity to the building owner match requirement of SP4.
- 4) Consider how SP11 may be combined with SP4 for operational efficiencies.

Below we detail our reasons for each. Please feel free to reach out to us if you'd like to discuss further, we are happy to help.

Kind regards,

David Burchfield, PE, CEM

&

Jacob James, CEM

Recommendation 1: Expand the scope of SP4 to include an alternative funding mechanism to ensure small commercial participants benefit from reduced utility spend.

Currently, the goals measures of SP4 are two-fold:

1. Reduce total lifetime CO₂e emissions.
2. Target percent energy savings for BIPOC business owners.

As proposed, a successful implementer of SP4 will indeed install new equipment and reduce lifetime CO₂ emissions. However, even a successful implementer will do an insufficient job at addressing the split incentive issues and is unlikely to present tangible/noticeable cost-savings to the tenants.

Consider a typical 15,000 sqft small business on a NNN lease with an EUI of 50 kBtu/sf/year. This business would spend approximately \$20,190 per year on utility costs assuming \$1/therm and \$0.11/kWh. This Portlander, via SP4 receives electrification upgrades - upgrading their heating and DHW systems from natural gas to heat pumps. They also receive building control upgrades and training. Altogether, the project is estimated to cost ~\$25,000. Overall, these measures reduce their EUI by 20% to 40 kBtu/sf/year- a fine result! It will save approximately 12 metric tons of CO₂ annually.

However, note that a 20% reduction in EUI, from 50 to 40 kBtu/sf/year, along with fuel-switching will likely only reduce the tenant's total utility spend by ~10% or about \$2,000 per year. This is because natural gas pricing is currently much cheaper on a kBtu basis. This cost savings value is somewhat *"in the noise"* such that depending on extent of higher demand charges from increased electric demand, on weather conditions and on varied operations, the Portlander may fail to notice the cost savings improvement. This is obviously not ideal, nor does it realize the full intent of the program.

It is our pressing desire to not only help small businesses reduce GHG and be resilient to climate change, but to see tangible cost savings from their actions. As in SP4's opening text- we want to help these small businesses grow away from their tight margins and emerge from financial hardships. In addition, we want to solve the split-incentive problem to prevent program funds from only benefiting the building owner, and we especially want to refrain from harming the tenant through increased utility costs or lease rates!

Below we propose a method to help alleviate this problem. We are happy to ideate further with PCEF as desired.

We first considered a few alternatives: Direct bill offset payments on behalf of participants would guarantee a percent reduction in their spending and would surely be appreciated by business owners, but as a concept is unsustainable. Community solar would be a sustainable solution, but in our estimation is still an expensive tool to offset a similar contribution as energy efficiency improvements.

Instead, we consider a third potential approach:

- SP4 could enroll participant businesses as a cohort and leverage the combined power of the cohort to achieve bill reductions.

This could be accomplished through:

- A) collective participation in utility sponsored demand response program- whereby participants are paid by their utility for the flexibility they add to the grid. Grid flexibility would be made possible by the control system upgrades and high efficiency electrification equipment SP4 is already designed to install.

- B) collective negotiation/bargaining of rates with Portland General Electric. Though requiring skillful navigation, we believe a rate structure carveout is wholly possible and would be supported internally by PGE.

Importantly, these benefits would stay attached to the tenant, rather than the building owner, helping alleviate the split incentive. We believe a combination of these approaches could end up reducing their cost per kWh by more than 20% to approximately \$0.09/kWh, achieving the target utility spend reductions not possible through energy efficiency alone.

Recommendation 2: Increase the budget allocation of SP4: Clean energy in small commercial buildings.

Below we provide two narratives to support the budget increase. These can be taken together or independently.

Reason 1: Balancing of budget to more closely match GHG reduction potentials.

Currently, 34.7% of the 750M proposed budget is allocated to residential clean energy programs, while only 3.3% of the budget is apportioned to clean energy in small commercial buildings. However, it is our findings, that when considering natural gas to heat pump conversions, the commercial buildings sector may play an outsized role in reducing GHG emissions. Using data from Oregon’s Biennial Energy Report, the commercial sector has a roughly equivalent, if not larger part to play in GHG emission reductions from heat pump conversions than the entire residential sector (single-family + multifamily). Put simply, when the goal is to reduce GHGs, the larger unit size and higher concentration of gas heating in small commercial buildings makes them very attractive.

Program	Percent of \$750M Budget	Approximate % of Oregon’s GHG Reduction Potential from Natural-Gas to Heat Pump Conversions
SP1: Multifamily (regulated)	8%	3.8%
SP2: Multifamily (unregulated)	8%	
SP3: Single Family	18.7%	4.2%
SP4: Small Commercial	3.3%	

Residential uses **23.5%** of Oregon Energy Consumption, and HVAC is **34%** of energy demand for residential sector. Of the 1.8M residences in Oregon, 77% are single family, and 23% multi-family. 58% of single-family homes use natural gas as a primary heating source, while only 13% of multi-family homes use natural gas. Together (77% x 58% + 23% x 13% = 48%) approximately **48%** of residences are heated with natural gas. Therefore, approximately (23.5% x 34% x 48%) = **3.8%** of State's energy consumption is residential natural gas use for HVAC. In Portland metro, the percentage would likely skew lower due to the higher density of multi-family housing.

Compare this with the commercial sector, which consumes **19.3%** of Oregon's Energy expenditure and where HVAC accounts for **33%** of energy demand. As of publication, **67%** of commercial properties use natural gas as a primary heating source. Approximately (19.3% x 33% x 67%) = **4.2%** of state's energy consumption is commercial natural gas heating use for HVAC.

Source: <https://www.oregon.gov/energy/Data-and-Reports/Documents/BER-Chapter-1-Energy-Numbers.pdf>

We understand, appreciate, and agree with PCEF’s desire to distribute funds to low and moderate-income housing owners and renters. By no means do we request the division between commercial and residential be equivalent. We do however recommend the apportionment be more balanced to serve more small commercial business owners and renters. With goals and outcomes and eligibility unchanged, we recommend increasing the budget to

SP4 to **\$40M*** to better serve this community and achieve a more significant GHG reduction from this sector. We believe the increased number of buildings able to be served remains achievable within the timeframe.

*This figure, over the five-year funding horizon, is approximately \$8M per year, and still less than 15% of Energy Trust of Oregon's annual commercial existing buildings spend. We believe this is an appropriate range when contrasting it with Energy Trust's wider territory service goals and that their program only provides modest cost coverage (~15-20%) of building upgrades, whereas PCEF intends to cover deep building retrofits in a smaller service territory.

Reason 2: Add budget to support Recommendation 1.

Add funding support for deployment of collective bargaining and demand response programs or similar, with a minimum scope of providing services to small businesses participating in SP4. Further analysis is recommended, but we currently estimate the budget would need to increase by 20-30%.

Recommendation 3: Add clarity to the building owner match requirement.

Currently the text reads "Building owners will be required to provide 25% match." Requiring building owners to contribute a 25% match is understandable. However, in a tenant/landlord situation, the split-incentive issue will surely arise. The landlord, being the one described as the "building owner" is in the driver seat and may opt to either not proceed or may simply opt to recoup the 25% cost through rate increases. Editing the concept slightly, the party responsible for the 25% match could be more loosely defined and include the tenant and/or other programs (e.g. utilization of Energy Trust incentives could count towards the % match requirement).

We further recommend that a Building owner should not be able to apply on behalf of their tenant- rather, the tenant, who's qualifications are used for approval, should be in the position of power as much as possible.

Recommendation 4: Consider how SP11 may be combined with SP4 for operational efficiencies.

Consolidating programs can lead to cost-efficiencies and a better utilization of funds. SP11 shares many similarities with SP4 and the two could be combined. This may simply require:

- Adding a requirement to SP4 that a certain project count (or expenditure amount) should be devoted to projects on the 82nd Avenue corridor.
- Shifting the private property tree installation to the scope of SP12
- Expanding the scope of SP4 to include EV charging stations (which could be thought of as "appliance/equipment")



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April 5, 2023

Re: Community Energy Project Comments on PCEF Climate Investment Plan

Dear PCEF Staff,

Community Energy Project (CEP) submits the following comments regarding the PCEF Climate Investment Plan (CIP). Overall, CEP supports the draft CIP, and is excited by the scope of the strategies and funding investment. We will comment only on the Single Family Home residential program.

Single Family Home Residential Program

- 1) We support the multiple levels of funding based on income level. Having programs that serve low and moderate income households is needed, and we support the proposed plan.
- 2) We are concerned that changing what types of agencies can apply for these funds will have unintended consequences. PCEF was originally designed in part to grow and support local nonprofits. We remain concerned that the program was opened up for profit businesses and government agencies.

For example, in the single family home retrofit program, the CIP indicates that government agencies can apply for these funds. However, it is unclear why PCEF would fund other government agencies to upgrade low-income homes. We understand the argument that PCEF funding be made available for other government agencies to upgrade city owned buildings or public spaces such as the 82nd Street development. That said, it seems unclear why PCEF would fund other government agencies to upgrade private residences. There are nonprofit organizations and for profit businesses that will be able to manage these programs. The proposed plan would have these groups competing against other government departments.

We do not support funding government agencies in the single family home residential program, and urge you to remove government agencies from the list of eligible entities in this part of the plan.

- 3) We are encouraged that the plan will explore ways to include renters into the upgrade opportunities. We recognize that this program may need to be flexible in its design.
- 4) We support requiring proposals to have a minimum of 50 homes per year to be eligible. Groups hoping to target their work with smaller numbers have the option to apply via the community grant program, and can build their capacity by starting with those funds.

In conclusion, we appreciate the opportunity to provide feedback on the PCEF CIP and overall support the draft plan both in its scope and variety of program areas. This plan can be truly transformative for Portland and our communities.

However, we have concerns about the inclusion of government agencies in the Single Family Home Residential Program, as we believe it may have unintended consequences. We urge PCEF to consider removing government entities from being eligible to apply for funding in this area and ensure that the program continues to serve the mission of supporting local nonprofits. With this change, we believe that the PCEF CIP can achieve major carbon reductions in ways that benefit those most impacted by the climate crisis, and we eagerly anticipate its successful implementation.

Sincerely,
Charity Fain, Executive Director
Community Energy Project
Charity@communitenergyproject.org

As a lifelong Oregonian and Portlander, I am writing to express my strong support for Frog Ferry and to ask you to include Frog Ferry in your fiscal year 2023/2024 budget. As someone who grew up along the waterfront as the child of parents who were vendors of the Portland Saturday Market for more than 36 years, I have seen firsthand how the Portland Waterfront has been a destination for tourists and locals and a focal point of our beautiful city. We must invest in our waterfront and follow the lead of other cities across the world and make our waterfront a place that is accessible to all.

I believe that Frog Ferry will help build on this tradition by providing a new and exciting way for people to get around the city and enjoy the waterfront. As someone who has spent many memorable hours along the waterfront, I know that Frog Ferry will be a welcome addition to our city.

Portland needs a win and Frog Ferry will help revitalize our waterfront and bring new energy to this important area. By providing a fast, safe and efficient way for people to get around the city, Frog Ferry will help attract visitors and locals alike and create new opportunities for businesses and vendors. I also see the benefits it provides for disaster preparedness, creating more accessibility for seniors and literally bridging north and south Portland through this new means of transportation. As a mother of a PPS student I also invite new and creative ways to bring our kids to the river and look forward to the educational opportunities Frog Ferry will provide to children throughout the region.

Let's change the headlines! Invest now in something bold and innovative and include Frog Ferry in your fiscal year 2023/2024 budget. By doing so, you will help build on the proud tradition of the Portland Waterfront and ensure that this area remains a destination for generations to come.

Thank you for your consideration.

Respectfully,

Jessica Elkan

Portland Resident



Portland Clean Energy Fund (PCEF) Staff and Committee,

We admire the radical objectives of the Climate Investment Plan (CIP) to address systemic inequity and climate resilience. Your website asks us to *Tell you what we need to participate*. Per your invitation to share feedback on this preliminary draft of the CIP, we would like to share our thoughts.

[Willamette Falls Trust](https://willamettefallstrust.org) is an organization acting on behalf of Northwest Tribes with a cultural history and presence tied to the Willamette Falls, located just south of Portland between West Linn and Oregon City in Clackamas County. Delegated representatives from the following Tribes sit on our general Board of Directors, as well as make up our Tribal Leadership Committee: The Confederated Tribes and Bands of the Yakama Nation, the Confederated Tribes of Siletz Indians, the Confederated Tribes of the Umatilla Indian Reservation, and the Confederated Tribes of Warm Springs. While these Tribes are located across the region, they all share a common connection to the Falls, a place to collect first foods and materials, to fish for salmon and lamprey, to gather and honor sacred waters, and especially the greater Portland Metro region as the confluence of two rivers that tie our people together.

The PCEF guidelines, as currently written, reinforce boundaries that air, water, and wildlife do not recognize, and have never recognized. Willamette Falls Trust is committed to public access and collaboration in the interest of stewarding these critical natural and cultural resources. By limiting the geographical location to Multnomah County in many of the CIP funding categories, PCEF risks prioritizing arbitrary delineations that contradict the fund's spirit of assisting Tribal communities and cultural resources connected to Portland Metro ecosystems since time immemorial. These are the very communities that PCEF sets out to support through climate resilience, restoration, and healing. We urge eligibility criteria to be expanded to support any project proposed by Tribes with historic, cultural, and legal connections that also impacts the water, land, flora, and fauna within the greater Portland Metro ecosystem.

Thank you for the opportunity to share our thoughts on the CIP.

Sincerely,

A handwritten signature in dark ink, appearing to read "AM", is written over a light blue horizontal line.

Andrew Mason, Executive Director

Willamette Falls Trust Board Executive Committee

Robert Kentta, Board Chair

Confederated Tribes of Siletz Indians, Cultural Resources Director

Rev. Marianne Allison, Board Vice-Chair
St. John the Baptist Episcopal Church

Bill Dolan, Treasurer
Senior Philanthropic Advisor, US Bank

Aaron Barber-Strong, Secretary
Political Coordinator, International Brotherhood of Electrical Workers

Pam Knowles, Immediate Past Chair
Consultant

Davis "Yellowash" Washines, Tribal Leadership Committee
Confederated Tribes and Bands of Yakama Nation
Government Liaison, Yakama Nation Department of Natural Resources



April 7, 2023

Dear PCEF Staff,

Thank you for the opportunity to provide feedback on the Portland Clean Energy Community Benefits Climate Investment Plan. My name is Alexa Diaz and I am a Senior Policy Manager at Forth. Forth is a nonprofit organization dedicated to the equitable advancement of clean transportation. For more than a decade, Forth has been building program and policy models that significantly expand equitable access to electric transportation in the U.S. and beyond.

We are excited to see the Portland Clean Energy Community Benefits Fund prioritize transportation decarbonization. Transportation accounts for a significant proportion of carbon emissions and PCEF priority communities are disproportionately impacted. Below are recommendations related to transportation decarbonization:

Strategic Program 4:

- Consider allowing small commercial buildings to use funding for EV charging stations as a benefit to employees and customers. Providing workplace charging options for small businesses makes it easier for employees to switch to electric vehicles. Allowing customers of small businesses to charge may also increase economic benefits as it can attract customers.

Strategic Program 6:

- Consider proposals that outline partnerships and education with Portland e-bike retailers, these retailers will help with ensuring community members are using e-bike incentives.

Strategic Program 7:

- Include travel options that utilize electric transportation such as electric carshare and electric rideshare.

Strategic Program 14:

- Provide or include funding for technical assistance for schools interested in acquiring electric school buses. Technical assistance can help with understanding whether to purchase a new electric school bus or repower, site planning for charging infrastructure, and installation of electric charging infrastructure.
- Consider allowing repowers of school buses as well as purchasing new electric school buses. Both options provide quality clean transportation for students and have a long life span, but differ in price.

Thank you for the opportunity to provide feedback.

Regards,
Alexa Diaz

Consider sharing what is working well in this draft, what should be improved, and additional ideas to improve equitable outcomes for PCEF priority populations.

This feels like regenerative agriculture is slowing losing the momentum and priority for PCEF, which is directly reflected in the miniscule amount of proposed funding in this draft. As we have seen during the COVID-19 pandemic access to healthy and culturally appropriate foods are essential for priority populations and should be given more attention, not less. Of the PCEF market studies, the only one that was canceled was the Regenerative Agriculture session. This seems to have translated directly into this draft and the fact that regenerative agriculture will get less and less attention/funding as this is not a main priority. Why was the market study for regenerative agriculture canceled, and why was it not rescheduled? Is the small amount of proposed funding because more information is needed about regenerative agriculture?

Urban tree canopy is getting a lot of attention and is directly connected with the green infrastructure maintenance (new funding line item) why is there no green infrastructure maintenance budget item for regenerative agriculture. Regenerative agriculture systems need continuous maintenance, development and focus for systems to adapt, change and fortify and run smoothly. Plants and food producing plants should be given the same priority and treatment in this proposal. Please address regenerative agriculture as a system that deserves the attention and funding that other green infrastructure budget items are getting.

Regenerative Agriculture needs to have a bigger focus and funding opportunity than what is currently in this draft. The current proposal has 3% allocated to regenerative agriculture, this is not enough funding for this critical system. This current draft proposal is utterly underfunding regenerative agriculture. If you look at cost of food, access to food and access to land 3% of the budget is not providing sufficient funding for our city to understand, build and create a regenerative agriculture system that is known at all levels of government and community. This needs to increase by at least 10% if not more over the next 5 years. One of the hardest things to do as our climate changes is grow food. Invest more money now into the regenerative agriculture system to ensure its robustness and resiliency through climate change to guarantee that priority populations have access to culturally-nourishing foods.

There are several areas in which Regenerative Agriculture needs to be imbedded at a deeper level in this draft proposal:

- Include specific language in workforce development to include careers in regenerative agriculture, PCEF funding could build a green workforce Regenerative Agriculture career pathway (this currently does not exist)
- Include specific language in regenerative agriculture (like in green infrastructure maintenance portion) "Healthier and more resilient urban regenerative food system that can better withstand the impacts of climate change."
- Add specific language to regenerative agriculture (like in comprehensive access to E-bikes) "Increased mental and physical well-being due to greater outdoor physical activity in garden or farm setting."
- Increase the funding for regenerative agriculture

PCEF projects at all levels MUST be led by nonprofits- this is what makes this fund unique, don't take this away from the process. For-profit and government agencies have other sources of funding streams. Don't take this opportunity of power and control out of the hands of nonprofits. With PCEF funding being led by nonprofits, other partners can build bridges with nonprofits to work together, but with other forms of businesses being able to apply or get funding directly this will become an unfair advantage for businesses and government and will no longer incentive centering local nonprofits thus taking the proven leaders out process.

Dear PCEF Board,

We are writing to express our strong support for Frog Ferry's consideration as part of PCEF's future programs. As the developers of electric outboard motors for commercial fleets, we believe that Frog Ferry's mission aligns perfectly with the objectives and priorities of the Climate Investment Plan, specifically strategic program 7: Equitable clean transportation access.

Frog Ferry's proposal to provide equitable access to the river is particularly compelling. By revitalizing our waterfront and creating new jobs, the project will contribute to Portland's economic growth while also reducing greenhouse gas emissions. Additionally, the development of additional public transportation nodes will ensure that Portland is better equipped to face the challenges of climate change, particularly in the event of a disaster.

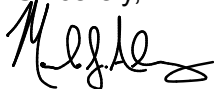
We are particularly excited about Frog Ferry's potential to foster education about the river ecosystem and build an understanding of Native American history in our region. These goals align perfectly with PCEF's focus on advancing racial and justice goals while addressing climate change.

Finally, we believe that Frog Ferry's proposal has the potential to connect communities up and down our metropolitan area and provide a new fun activity for visitors. Getting people out on the water for fun is an excellent way to promote the use of electric charging infrastructure while also building a sense of community.

In conclusion, we urge the PCEF Board to be bold and innovative in building a better Portland. Including Frog Ferry as part of your Climate Investment Plan is an excellent way to do just that.

Thank you for considering our request.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Alvarez', with a stylized flourish at the end.

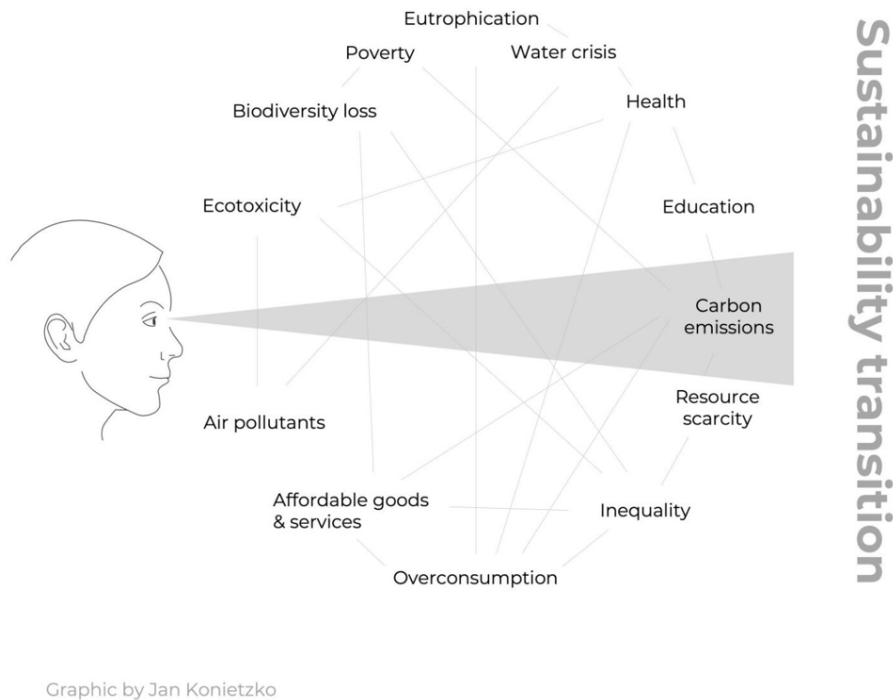
Marcelino Alvarez
CEO, Photon Marine

1. What might be missing from the CIP draft?

As we indicate above and below, we are very supportive of the CIP and grateful to be part of the current cohort of grantees. One question we have stems from how PCEF is rooted in climate impact, specifically GHG reductions. What if existing grantees discover that they need additional capacity to carry out their project? For example, what if we learn, through our community engagement process, that communities of color, low income populations, people with disabilities, and other vulnerable communities are already likely polluting the least, might want and benefit more from enhanced education, better access to affordable goods and access to tangible assets to build intergenerational wealth? All of these issues have a relationship to the success of one key element of our project (and ultimately reduction of CHG) which is to help low income communities purchase an EV.

We wonder if the CIP will allow access to newer capacity building funds for an existing PCEF grantee or project? Also, would it be possible for existing grantees to request flexibility in deploying their PCEF investment if they discover the need for additional organizational capacity to better meet the needs of the community since the CIP was not developed prior to the current grant cycle? Specifically we are curious if the Transportation decarbonization funding category or the organizational capacity building funding category (both which mention flexibility with respect to CHG reduction) can retroactively support existing grantees? In thinking through our implementation plans to improve access to EVs, and how we will work with communities to carry out our project, the systemic and complex nature of this problem suggests to us that we need to be mindful of “Carbon Tunnel Vision.”

Carbon Tunnel Vision



Also, there needs to be additional descriptions regarding the intersectionality of all of the funded category areas, and the need for this to be a coordinated effort. For example, climate jobs and workforce which requires increased training and exposure to climate change issues and careers in that field, also relates to the need for transportation to and from work or school, and moving to electric forms of transportation, which also requires increased education around climate change issues and carbon emissions. Frontline communities have been left out of the climate conversation and are now inundated with options to reduce GH emissions; however, they are expected to get up to speed on these issues in a very short amount of time. It's assumed that the only issue around not electrifying transportation is access, however, there may be other factors.

And, the question of whether or not RFPs for CBOs include funding for building of staff capacity and development, in order to achieve goals that are evolving, through the grant work, need to be addressed.

2. What are we doing well with the CIP draft?

It is clear that a lot of thought and planning went into the diversity of strategies outlined in the CIP, including multiple options for public input. There is a broad and comprehensive range of focus areas to tackle this very complex and broad issue of equity-driven clean energy projects and climate solutions, on the most impacted/frontline communities. There are also clear and transparent timelines and goals about what is happening, by who, and how much is being spent. Many state and federal strategies to combat climate change focus on middle and upper class home owners.

Overall the CIP draft reflects the interests and needs of the communities most affected by climate change and also provides opportunities for organizations interested in addressing climate to build capacity to engage in this work. The level and types of investments seem to be mutually reinforcing and the multiple pathways that PCEF will invest in communities/organizations suggest that implementation feasibility has been carefully thought about. This community led and driven CIP will help all residents of Portland move to cleaner technologies.

Subject-specific feedback

1. **Please provide any feedback you have for certain sections in the draft or upload a document.**

MFS is encouraged by the new Transportation decarbonization focus area as noted above. We believe that focus along with SP#13 have the potential for transformational change in addressing economic disparities in intergenerational wealth along with meaningful lifetime reductions in CHGs.

#6 Comprehensive e-bike support - MFS is encouraged by this program and wonder how its size and scope should influence or will change one element of our project which was to help low income people purchase an ebike.

#7 Equitable clean transportation support - This program sounds great and we look forward to connecting communities to the transportation wallet. We do wonder if it would be possible for non profits involved in climate change work to receive some level of support from this fund so that they could offer the use of the transportation wallet to all employees? What if PCEF offered a lump sum incentive for non profits to finance alternative transportation methods rather than single use vehicles. We have looked at this at MFS and would like to build a pathway towards reducing individual

trips internal combustion vehicles but cannot finance this entirely on our own.

#8 Organizational Capacity Building - We have first hand experience in helping organizations build capacity through [Social Purpose Works](#) and have seen big gaps in key capacities such as fund development, information management, risk management, finance, human resources and other fundamental aspects of organizational health. These organizational skills are critical in successfully partnering with the City particularly when it comes securing reimbursement for activities delivered per contract.

#13 Access to Fair and Flexible Capital - Strategic Program 13 is helpful to small businesses but we think the strategy of funding CDFI credit unions with capital to do no interest loans, loan loss reserves, or down payment assistance for electric vehicle buyers is just as needed for individuals in PCEF priority populations.

We are particularly concerned about the high price of EVs and used EVs and the limited availability of rebates. We are also interested in piloting financial incentives and supportive programs that directly transfer wealth and assets to communities most affected by climate change and racial disparities in wealth generation. For example, we would like to pilot then build a portfolio of flexible financial incentive programs to help low income people start saving for an EV/ebike, match State and Federal rebates, purchase ebikes and EVs as well as match monthly payments for both EVs and ebikes. An EV can be a transformational asset that can help low income families reduce CHG and improve their overall financial health including but not limited to improved access to wealth building by expanding employment opportunities, improving access to continuing education and better connectivity to affordable and enriching childcare.

Other concerns we have are:

- How will rent stabilization agreements be enforced for renters who access the clean energy home improvement program? If landlords do not uphold their agreement, how will renters get the support they need to ensure their rent remains stabilized?
- Is the development of better and safer bike routes and bike infrastructure east of 82nd part of the discussion for the comprehensive e-bike access and support program?

2. **What subject(s) best characterizes the comment above (select all that apply)?** *This helps us make sure that your comment goes to the right staff member to consider in the next draft.*

- ☐ Redeveloped affordable housing EE/RE
- ☐ Single family home residential
- ☒ **Unregulated multi-family housing**
- ☐ Small commercial
- ☐ Community resilience hub
- ☒ **Transportation decarbonization**
- ☒ **82nd Avenue**
- ☒ **CBO Capacity Building**
- ☐ Regenerative agriculture and green infrastructure
- ☐ Workforce and contractor development
- ☒ **Access to Capital**
- ☐ Equitable Tree Canopy
- ☐ Not listed, please describe:

Questions and concerns that require further clarification [requires more specific language in the CIP]:

- What type of external research projects, data sources, and program evaluation is going to be in place to evaluate, and not just deploy, the resources and evaluate them through climate and equity goals (that the City has at the top of its strategies)?
 - How is the workgroup going to be selected?
- Who are the technical experts engaging in the CIP?
- How much is allocated for community outreach and education? Settling on a specific number would be useful.
- It could be advantageous to put quite a bit of money into the bike share program as PBOT administers it.
 - Put into the city system with community safeguards, as opposed to training groups administering the funding.
 - Ensure that we are putting good community bumpers—looking at the systemic issues.
 - There are labor issues going on with Lyft.
 - Important to motivate the bike share & mechanics right now.
- The CIP should have language that emphasizes the importance of focusing on the capacity of bike shops to sell out *X amount* of bikes. It is important to figure out how to scale up the system, as opposed to just dumping money into institutions or organizations.
- With paratransit: ensure we are looking at the regional system.
 - By making investments in Portland, we are not exacerbating inequality in the rest of the region.
 - Different agencies need to talk to each other, as opposed to CBOs leading that space.
- Electrification concern in CIP:
 - What is the framing around electrification??
 - Lithium mining is happening in indigenous communities
 - **Need lifecycle analysis**
 - The CIP should have language that commits to unpacking ‘electrification’ long term, as it is harmful to priority communities.
 - There are different scales of electrification, and smaller infrastructure still causes harm, e.g., e-bikes.
- The Transportation Wallet could potentially exclude Uber and Lyft unilaterally and use taxis instead. Important to note the human rights violations by Uber and Lyft. GTT could

support more public control and public administration as opposed to corporate control and corporate administration.

Additional Comments/feedback from the Coalition members:

- The Street Trust is finding out through their E-bikes for all ambassador programs that there are not enough bikes in the system for community members to access, which does not make the program incredibly reliable. The ST also points out that community members that have been using Biketown love it.

We want Portland and the Portland Clean Energy Fund to be bold and innovative to build a better Portland. Include Frog Ferry in your fiscal year 2023/2024 budget.

Frog Ferry will revitalize our waterfront while reducing greenhouse gas emissions.

It is a tool to build community resilience in the event of a natural disaster. Importantly, it will connect employees to jobs while creating new jobs.

By connecting communities up and down the Portland metropolitan area, Frog Ferry can, I believe, help foster education about the river ecosystem. Relatedly, it will build an understanding of Native American history in our region.

Lastly, for the tourists who are critical to the economy, Frog Ferry will provide a new fun activity for visitors by getting people out on the water for fun!