

**From:** [Diane Meisenhelter](#)  
**To:** [Council Clerk – Testimony; Mason, Vinh](#)  
**Subject:** Re: Testimony on 2nd Annual CED report this Wednesday July 20th--on proposed climate workplan  
**Date:** Sunday, July 17, 2022 9:01:57 AM

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Please send this version to Council instead.....I am on the road and realized I'd sent an unedited version prior.....Please use this instead. Thanks and sorry.

I have lived in NE Portland since the 1980s, but will be out of town on Thursday. I am writing on behalf of the Extinction Rebellion Action team and also volunteer with NAACP Environmental Justice. It is unacceptable that in the two critical years since the passing of the Climate Emergency Declaration there are few, if any, concrete policies the City can point to that result in a substantive decline in emissions which according to the IPCC needs to begin a significant decline by 2025 and be halved by 2030. The proposed climate workplan is an aspirational document that is short on specific concrete policies to reduce emissions. That is basically what the CED was AND the first-year action plan and neither have yet resulted in substantive actions to reduce emissions. As such, the City needs to create a Climate Emergency Commission with the best available experts and a broad range of stakeholders committed to reducing emissions to work with bureaus on concrete action steps, measurable outcomes, and timelines. Portland's recent budget process in a SURPLUS year found the city bragging about a .06% City Budget investment in climate related programs with a much smaller percentage of that slated for climate mitigation efforts-- not very indicative of a true Emergency Response. There are a lot of assumptions made in the Decarbonization model that we would like more information on, but we will follow up with staff.

Only in the transportation sector is anything close to a 50% reduction proposed by 2030 and even there the specific actions under T-1 and T-4 are very vague. Sixteen percent of the proposed transportation reductions rely on an update of the Renewable Fuel Standards and as Richard Plevin and other experts have pointed out, renewables come with their own set of climate issues and the corporate nonsense that Zenith and others quote on the emissions reductions levels of renewables is just plain wrong so the model needs to have all assumptions carefully vetted. The City needs to work with Plevin and other experts to develop good policies that account for the complexity of this issue. It is great that Portland plans to implement the POEM transportation recommendations, but what's the timeline for various parts of that?

The Industry section of this workplan proposing no expected reductions in emissions for the next ten years in that sector is totally unacceptable both for health and climate reasons. Behind the scenes, business interests worked to kill the Portland Clean Air Protection Program and it's ludicrous on so many climate justice levels that they are not being held accountable. The City needs to institute a workable carbon fee policy for the industrial sector asap. The City needs to be transparent about the consultant work being proposed around a Clean Industry HUB and have a citizen's advisory group with health and environmental representation providing oversight on that project.

Regarding the building sector, there are little concrete emission reduction actions presented in terms of what you will actually do in terms of emissions reductions (the vagueness, for example, in B1 and B2 with no concrete steps, measurables or timelines). I participated in the Build Shift process which City staff organized in a very informative way. We are concerned however that discussion tended to suggest 2026 as a possible target date for Build Shift implementation of carbon emissions reductions since the climate

science says there needs to be a significant downturn in emissions no later than 2025 and halved by 2030. Pushing back timelines will result in serious consequences and thus an incrementalist approach of annual decreases starting now is critical as benefits from GHG reductions will not be seen quickly. We agree with the concept of incentivizing early action and feel that the city needs to have policies in place that will begin a downward decline as soon as possible through private/public partnerships as well as encouraging the use of PCEF funds in this critical arena. Since there is baseline data on commercial buildings, we would recommend plans to start there in 2023 with commercial buildings of 20000sf and above and then phase in 10K sf commercial buildings and 20k sf large multifamily rentals two years later and continue with an ongoing phased approach in line with the climate science.

While we understand the systems life cycle benefits of a customized, interval based approach to emissions decline, we are concerned both about the ongoing energy cost burden on tenants (ranging from 18-45% of necessary budget expenditures) as well as not adequately reducing emissions on the schedule required by the IPCC. We do not want landlords to be able to continue to defer maintenance or delay as long as possible the big ticket items. Thus short intervals of 2-3 years requiring on average 10-15% emissions declines in each interval are needed allowing flexibility in terms of how building owners are going to get there through a customized approach addressing lighting, building envelope upgrades, mechanical upgrades, operations upgrades, and the like and benefitting from cost savings that can then be utilized for additional upgrades. There should be compliance fees to ensure that owners remain on task in meeting building performance standards. Likewise, inspections and compliance certification processes need to be developed. Any owner support or incentive mechanisms must have tenant protection agreements both to prevent displacement or owners passing along higher costs.

We support the idea of a Tenant resource center being developed and believe this should happen this next year to ensure tenants' health and energy cost burden are taken into account by immediately developing additional enforceable health building standards around indoor air quality and temperature. There needs to be a centralized data location for tenants to be able to access full disclosure on indoor air quality issues and energy scores for various properties before they rent (or purchase) as well as other information such as natural gas appliance warnings, reports on ventilation and the age and efficiency of heating and cooling systems and other appliances, radon reports, and a checklist of things to consider health and budget wise regarding that specific property. The tenant resource center could provide educational trainings on related topics as well as help prepare tenants in terms of climate resiliency and being prepared to respond to heat events. In the future, it might help tenants consider creating energy or building ownership cooperatives so that they might have more control over costs and maintenance issues. Finally, this center would work to develop policies to ensure that decarbonization policies include measures to prevent displacement or passing along higher cost burdens to tenants. This must be built into any programs which incentivize or provide resources to building owners as the number one priority to maintain safe, affordable housing. A resource center for building owners could be developed in year two to assist with identifying financing options, bulk buying coordination, design and technical assistance, expedited permitting, explore tax relief or tax credit options, work with investors to develop a revolving loan fund, identify funding to purchase relocation buildings to provide tenants options during renovations, provide trainings and document positive case studies, assist with matchmaking of building owners and potential contractors (particularly as part of workforce development for low income and minority businesses) and identify ways to incentivize early action.

The City should work with Multnomah County to develop health standards to prevent

natural gas appliances in new construction and begin phasing out natural gas from existing homes. The City should work with the County on this for both indoor air quality as well as emission reductions. Some of the data presented during Build Shift was insufficient. For example methane was presented as 25x CO<sub>2</sub> based on the generally used 100 year GWP per ton (the actual 100 year calculated rate is 28x), but more importantly, the true impact of methane GWP per ton is 120x CO<sub>2</sub> and in the critical next 20 years, the GWP per ton is actually 84x CO<sub>2</sub> which is why we need to move to clean renewable electrification asap and why dozens of cities across the US as well as CA and Massachusetts are moving to ban gas hookups in new construction. Health studies clearly show that neither ventilation nor filtering were significantly sufficient for methane, nitrous, and particulate matter although they should be required.

Any cooling standards developed must ensure that cooling sources are energy efficient and not adding substantially to climate chaos. We support heat pumps, safe renewables, passive designs, and conservation methods to ensure that the long range costs and climate and health consequences for tenants are not adding harm. We are disappointed in the vagueness of the sequestration and trees section of this document. Despite calls by the Shade Equity Coalition, there is no mention of street tree planting maintenance, the new Parks tree planting program is committing to less than half of the number of plantings that Friends of Trees has done in the past, and most importantly there is no commitment to inventory and preserve giant old trees as community shade equity and sequestration resources, even if they are on private property. Waiting two years to begin the tree code revision process is unacceptable unless a moratorium is placed on the cutting of old giants. The City needs to address the heat island issue by developing programs to preserve giant old trees, especially in lower income and shade deficient areas, instead of the problematic “pay to slay” programs that continue to allow the destruction of these valuable community resources.

The City makes a huge point out of the necessity of decreasing energy supply from fossil fuels towards clean renewable sources. The City focuses on PGE which may be around 2/3rds of Portland’s households although it is difficult to find data so this is based on service area although Pacific Power area of N/NE Portland is denser than areas of the west hills for example. Pacific Power is problematic as their parent company is PacificCorps and their renewable claims for Portland area are misleading given that the parent company plan for western states is to continue with coal for way too long then transition primarily to fracked methane and nuclear. Even PGE plans to continue their Colstrip, MT coal mine units 3 and 4 until 2034. More detailed study of utility IRP’s will be needed to see how they actually expect to get to the promised transition. There is a huge gap between what is promised here and whether or not utilities will meet the state’s Climate Protection Plan goals, especially since the utilities are actively fighting these in court.

The City should immediately begin work on Community Controlled Energy programs and be ready to increase the percentage upwards from 10% if the utilities are not on track with CPP goals (there are many other very good reasons to go this direction as well). There are examples of communities in California that have created their own Energy districts and utilize the profits for the common good—climate and social justice. Kauai has brought consumer energy costs down by focusing on community solar and reselling residential and offpeak surplus to other utilities or businesses. All decarbonization efforts must involve workforce development aspects so that the green transition creates living wage family jobs and clear career paths for advancement, especially for marginalized communities.

We want to note that there are departments such as police that seem to be left out of this document planning process even though they consume a vast segment of general fund

resources.

It is time to go back to the drawing board, establish a Climate Emergency Commission and get to real action policies—concrete steps to reduce emissions on the order of at least 5-10% per year with measurable outcomes and timelines in line with what the science is telling us. I apologize for this being long, but the quality of the work plan document after two years of study with no real emissions decline policies is extremely disconcerting and your constituents and the world deserve better.

Diana Meisenhelter  
Cell: 503-349-1460  
meissun@hotmail.com

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**From:** Diane Meisenhelter <meissun@hotmail.com>  
**Sent:** Saturday, July 16, 2022 5:54 AM  
**To:** cctestimony@portlandoregon.gov <cctestimony@portlandoregon.gov>  
**Subject:** Re: Testimony on 2nd Annual CED report this Wednesday July 20th--on proposed climate workplan

Sorry, my earlier testimony should have said Wednesday afternoon not Thursday in the title.....same testimony, just wrong day....thanks!

Diana Meisenhelter  
Cell: 503-349-1460  
meissun@hotmail.com

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**From:** Diane Meisenhelter <meissun@hotmail.com>  
**Sent:** Saturday, July 16, 2022 5:39 AM  
**To:** cctestimony@portlandoregon.gov <cctestimony@portlandoregon.gov>  
**Subject:** Testimony on 2nd Annual CED report this Thursday--feedback on proposed climate

workplan

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The City should work with Multnomah County to develop health standards to prevent natural gas appliances in new construction (as is being done in NY, CA and even Eugene) and begin phasing out natural gas from existing homes as the science makes clear that ventilation and even filtration are not sufficient solutions to the health and climate issues posed by methane, particulate matter, and nitrous oxide. Other communities are working to provide small heating and cooling geothermal districts using existing natural gas

infrastructure as a possible transition. The City should work with the County on this for both indoor air quality as well as emission reductions. Also some of the data presented during Build Shift was misleading. For example methane was presented as 25x CO<sub>2</sub> based on the generally used 100 year GWP per ton (the actual 100 year calculated rate is 28x), but more importantly, the true impact of methane GWP per ton is 120x CO<sub>2</sub> and in the critical next 20 years, the GWP per ton is actually 84x CO<sub>2</sub> which is why we need to move to clean renewable electrification asap and why dozens of cities across the US as well as CA and Massachusetts are moving to ban gas hookups in new construction. The City should work with the County on this for both indoor air quality and health concerns as well as emission reductions. Health studies clearly show that neither ventilation nor filtering were significantly sufficient although they should be required.

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Diana Meisenhelter  
Cell: 503-349-1460  
meissun@hotmail.com



**From:** [Damon Di Cicco](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Climate Emergency Workplan Testimony  
**Date:** Monday, July 18, 2022 4:37:48 PM

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Dear Council Members,

I'm writing to express my thoughts and concerns regarding the recently released Climate Emergency Workplan. Unfortunately my work precludes me from attending this week's hearing in person.

Allow me to begin by saying that I am highly encouraged by the City of Portland's recognition of the emergency situation we all find ourselves in with regard to climate change. I think it's wonderful that the Council is working toward a concrete and actionable plan to make sure Portland is a leader on what I believe is the defining issue of our time.

With that said, I am concerned that the plan as outlined doesn't go far enough in some areas. Specifically, my critique pertains to the section on industry. While other sections of the Workplan provide a range of concrete and measurable steps for action, the industry section feels tacked on, almost as an afterthought. I've read this brief section several times and it remains unclear to me what exactly is being proposed here or how the council or citizens would know if the goals were achieved. While I understand that the city's authority to control the activities of private entities is limited in a variety of ways, I believe more thought needs to go into how to reduce the climate impact of industrial activity in the city. Ideally, this would be done in a way that balances ambitious, measurable goals with retaining family supporting jobs when possible. The current document seems to just say "we'll try to come up with some ideas to reduce emissions in this sector," and I think the city needs to be more proactive than that in order to reach the laudable goals we have set. I would urge you to expand this section of the document with more concrete actions the city could take in this area.

Thank you for your consideration.

Sincerely,

Damon T. Di Cicco, PhD  
3335 S Corbett Ave.  
Portland, OR 97239

**From:** [Karen Wolfgang](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Testimony about the Climate Emergency Workplan  
**Date:** Wednesday, July 20, 2022 9:14:55 AM

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Dear Portland City Council and bureau staff,

I am writing in response to the Climate Emergency Workplan, which I am glad to see as a representation of the ongoing work within the City to reduce greenhouse gas pollution. However, if we as a city are to reclaim our "legacy of leadership" in climate action, a guiding document like this needs to substantively reflect not just the WHAT but the HOW of the City's plan to meet the moment.

There were many mentions of the awareness of the importance of climate justice--that is, the fact that BIPOC and under-resourced communities are impacted first and worst by escalating climate trauma. That's appropriate, because of course it's true. But in Portland, we have a tendency to name the problem without connecting it to actions we will take to engage with that problem. It's all well and good to encourage City staff to put an equity lens on when considering all the things the bureaus will do. But the HOW of the ongoing consultation with community groups and frontline stakeholders is an important part of the City's effective response.

Along those lines -- do you plan to share, at some point, how this workplan was developed? In consultation with community organizations, in collaboration between bureaus, or...? It is NOT enough to call out a bunch of actions that the City will take. We need to make good governance, community engagement, and effective collaboration PART OF THE PLAN, from conception to execution. And we need to make that aspect of climate emergency galvanization transparent, because it is not sufficient to have those in the know about the process, know, and those not in the know left guessing. HOW the City does this work is just as important as what it does (or, at this stage, says it's going to do).

On that note, I am not seeing much in the way of broader community engagement or intergovernmental partnership named as a climate mitigation and adaptation strategy. The City of Portland is not the only actor here, and whatever the City does only goes so far to addressing the climate emergency. Yes, the City should focus on what is inside its span of control. But this workplan seems to suggest that what the City says it will do will solve the problem for our City's future, which is absolutely ridiculous. Even if Portland did everything it says it's going to do, which would be surprising and amazing, the climate emergency will not be over! Focusing inward on the City's own activities is absolutely insufficient.

The City is one partner in a truly interlinked set of jurisdictions, from the hyperlocal to the international, and I want to see this at least recognized in the plan. Strong collaboration BETWEEN BUREAUS (perhaps the one thing that the City can fully control) and with neighboring municipalities ought to be lined out as part of the plan. Previous Climate Action Plans were City-County collaborations, and that seems to have been lost in this version. Furthermore, the City is full of PEOPLE, and the people need to be engaged in execution of the plan. If the City has a plan for that, GREAT! Share it! And if it doesn't...that is a key component of effective response, and needs to be carefully integrated into the workplan before it is finalized.

Thank you for your consideration, and I hope you are well-resourced for the conversation to come around this truly important work.

Karen

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Karen Wolfgang  
16825 SE Woodward St., Portland, OR 97236  
503-704-9427

**From:** [Brooke Kavanagh](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Written comments for item #656 Climate Emergency Workplan  
**Date:** Wednesday, July 20, 2022 11:18:20 AM  
**Attachments:** [Testimony for CED Workplan.docx](#)

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Please accept the following attachment as written testimony for today's agenda item #656 Climate Emergency Workplan.

Good Afternoon Mayor and Commissioners:

My name is Brooke Kavanagh. I am here today as a volunteer with 350PDX. 350PDX has been working to help build the local grassroots climate justice movement for the past 9 years. We work to address the causes of the climate crisis through justice-based solutions

I'm here today to share some preliminary thoughts about this Climate Emergency Workplan.

I want to start by sharing appreciation for the work that frontline community based organizations, BPS staff and other bureau staff have been doing and that is reflected in this plan.

And this workplan is a clear effort to make Council understand the urgent need to support Climate Emergency work through funding and policy adoption, both of which have long been obstacles to rapidly accelerating climate justice work at the City.

- It is critical that Council approve these programs and funding requests when they come across your desk from now to 2025. Approving a resolution isn't enough, we must follow through with the support and resources needed to implement them.

But while there is much to praise about this plan, it has to be stated that there has not been a robust public engagement process for it, like a public comment period. So there are a lot of questions and uncertainties that remain. For example,

- Are these all the things that should be in here?
- Should there be a section for support and funding for community engagement and for the frontline-led community collaborative space for the climate justice plan? And how will the climate justice plan articulate with this plan
- There is a need for specific, measurable, actionable information - How do we ensure goals are measurable and achievable? How much will each of these items actually cost? If resource needs and gaps for FY 2022-23 are still TBD, when will they be determined and how?

- Reliance on Portland Clean Energy Fund - If PCEF funds aren't a sure thing, what's the contingency plan? What are the resource needs and how was the forecast of PCEF funding determined to be sufficient?

One other concern is that this hearing for the workplan seems to also be serving as a the required progress reports on the Climate Emergency and the 100% Renewable Energy Resolutions. But a progress report shows what was laid out, what has happened, and what hasn't happened. It is an opportunity for stakeholders—including bureaus, community, the utilities – to come together to discuss barriers, what's been dropped, and what changes must happen so that goals can be achieved. This workplan doesn't fully accomplish that and seems a missed opportunity for transparency and accountability.

Thank you for your consideration of these statements and questions.

Brooke Kavanagh

**From:** [Noelle Studer-Spevak](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Testimony for item 656: Climate Emergency Workplan  
**Date:** Wednesday, July 20, 2022 11:52:39 AM  
**Attachments:** [Workplan -Families for Climate.pdf](#)

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Greetings,

Please accept our detailed suggestions and overall recommendation that Council requests a more detailed Climate Emergency Workplan no later than January 2023.

Thanks and have a great day!

Noelle

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**Noelle Studer-Spevak** *(she/her)*  
[Families for Climate](#) Board of Directors, 503.358.2055  
*Settler on unceded land of the [Cowlitz](#), [Cascades & Clackamas](#) Chinook peoples*



July 20, 2022

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

Parent climate leaders are concerned that City structure, function and staffing is fundamentally not up to the challenge of the swift and coordinated transformation required to rise to the climate crisis. We find that the "[Climate Emergency Workplan 2022-2025](#)" document lacks sufficient metrics, analysis and detail to be adopted as Portland's updated climate action plan.

**We urge Council to request that staff present a more detailed plan no later than January 2023 to address the shortcomings listed in this letter.** Our children are counting on you to get this plan right, for it will be guiding investments and staff allocation for the next three years, and as Bill McKibben has written about mitigating climate change, "Winning slowly is the same as losing."

Portland's plan must be more than a laundry list of to-do items or a catalog of what's already underway. A climate action plan should be grounded in sound analysis that informs the City how to get the most carbon reduction bang for the public buck. **This will require contracting with consultants or building internal staff capacity to do the heavy number crunching that is essential for setting specific, quantifiable action steps.** Here are some of our questions and recommendations related to the analytical rigor of the Workplan:

- How is staff prioritizing the list of climate emergency priorities starting on page 5? For example, when comparing T-1 (Making low carbon travel safe and convenient) and B-1 (Eliminating fossil fuels from private buildings), which one provides the most carbon mitigation? Co-benefits? Where does the City have the greater chance of success? Who pays/benefits? Members of the public cannot determine whether all of these questions were answered as part of developing this list. Are some key actions missing?
- Page 4 and T-9. The Workplan contains a transportation assumption that cannot be verified by staff without high-power modeling work. It states that an updated Renewable Fuels Standard will drop emissions 6% by 2030. There are some mistaken assumptions here. Microeconomic theory tells us that diesel vehicle owners will seek out the lowest price, even if they have to fill up their tanks with fossil diesel outside the city (elastic demand). Furthermore, increasing the availability of renewable diesel does not mean that less fossil diesel will be burned. To do this, Portland would need to cap the amount of diesel in the city.

**Follow through on implementing existing plans and integrate them into the Climate Emergency Workplan:** this could be a much stronger and more useful document by linking to existing plans with detailed goals and metrics when describing Climate Priorities 2022-2025. Examples:

- T-1. Link to the [Portland Bicycle Plan for 2030](#) that includes the vision that 25% of all trips will be made by bike by 2035, and that 70% of trips are non drive-alone.
- T-8. Please add a hyperlink to the draft 2040 Freight Plan
- Trees-1 Link to [Growing a More Equitable Urban Forest Tree Planting Strategy 2018](#)



**Please name specific potential policies wherever possible, for example:**

- B-4 “Lower embodied carbon in the built environment.” Adopting a policy that requires all concrete suppliers in the area to produce low-carbon concrete by default would be a powerful upstream policy with lasting impact. PBOT has already studied it extensively.
- Trees-2 Amend Title 11 to require that street trees are accounted for as an appreciable public asset. This would shift the City in the direction of maintaining these essential, life-saving assets.

**Shade trees mitigate climate pollution from buildings through direct shade and ambient cooling:**

- In B-3 add, “plant trees to shade buildings.” Follow the lead of Sacramento Municipal Utility District ([SMUD](#)), which has funded research to identify ideal locations to plant trees in relation to homes for the highest energy savings; SMUD has funded yard tree planting in Sacramento since 1990.

**Leverage expert public oversight to oversee the implementation of the Climate Emergency Workplan:**

- Portland could reimagine the role of commissions advising and informing the work of bureaus, especially in areas related to Workplan implementation. Currently, there is no public advisory group overseeing the City’s climate work and the Urban Forestry Commission is hampered in carrying out its mission. For commissions to be most effective and accessible, each should include members of frontline communities *and* subject matter experts who live in neighborhoods across our city. A stipend to cover childcare, transportation, or missed work should be made available to each participant, removing barriers to participation.

**A new plan is great, but don’t forget to cover the basics! Please shore up basic bureau and inter-bureau functions, because when government processes are broken, Portland can’t meet climate mitigation or resilience targets. Hopefully, the Charter Reform process will help with this, but in the meantime, please resolve the following issues:**

- All solar installers except one have decided to stop helping Portland residents add PV to their homes because 1) BDS is slow at granting all permits and 2) unlike other jurisdictions, BDS is requiring that an engineering study be conducted to add PV to roofs without trusses (all older homes). This adds quite a bit of expense and there are few engineers available to do this work. Other jurisdictions use trade permits. Consequently, there are Portland residents who want on-site energy production, but cannot make it happen.
- Reinstate the Interbureau Street Tree Task Force to examine Portland’s options for city-funded street tree maintenance, rather than the current policy of assigning this responsibility to the adjacent property owner.<sup>1</sup>
  - T-2: Please insert the word “management” along with tree planting and preservation. It is time for the City of Portland to assume management responsibility for trees growing in the public right-of-way, like other cities of its size across the country. Requiring private citizens with no skill and varying resources to maintain publicly-owned trees is wrong, placing an unreasonable burden on lower income homeowners, and helps explain why low-income communities suffer extreme summer temperatures.
- Additionally, the Task Force should ensure that all staff that touch tree permitting, right-of-way space planning, protection, planting and maintenance are tightly coordinated to leverage resources with civil society.

Thank you for taking time to read our suggestions and concerns.

Board of Directors, Families for Climate

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<sup>1</sup> [Growing a More Equitable Urban Forest Citywide Tree Planting Strategy](#), 2018. Pg.19

**From:** [Cathy Tuttle](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Written testimony on Resolution 656  
**Date:** Wednesday, July 20, 2022 1:05:35 PM

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**656**

[Adopt the Climate Emergency Workplan 2022-2025 as Portland's Climate Action Plan](#)  
[https://docs.google.com/document/d/1mzr7ZwFkG6Loi4jyL\\_9TX9RfXDYPI5Nkk8vkaDQtWCA/edit?usp=sharing](https://docs.google.com/document/d/1mzr7ZwFkG6Loi4jyL_9TX9RfXDYPI5Nkk8vkaDQtWCA/edit?usp=sharing)

July 20, 2022

Thank you Mayor and Council members for this opportunity to testify on Portland's Climate Emergency Work Plan, Portland Council Resolution 656.

I'm Cathy Tuttle. I live downtown and I'm a land use and transportation planning consultant.

Last night, I re-read Portland's 2015 Climate Action Plan. Hundreds of people spent thousands of hours making over 200 detailed recommendations or goals in the 2015 Climate Plan. They recognized then the urgency of our Climate Emergency and set benchmarks for 2030. We're halfway now from 2015 to 2030.

Goals included the number of trees to be planted, charging for driving on busy streets, making sure 25% of all trips went by transit and 25% by bike in 2030. Real goals, real timelines. In 2017 Portland did a progress report. Most of the goals had not been met, but there was a sense of urgency in 2017.

So now we're in 2022. Halfway to 2030. And the Climate Emergency clock is ticking.

I want to see numbers in a workplan. I want to see timelines. I want to see progress at this halfway point. This plan has no scope, no benchmarks, no timelines, no prioritization.

Portland can write some really good plans. Your plans prioritize people who walk and bike over people who drive. Your plans promise housing and safe streets.

This plan, this 2022 Climate Emergency Work Plan does not have the sense of urgency carried over from earlier climate plans. It's just another plan.

I feel like Portland is climbing up a ladder made of plans, up to a high diving board. Each rung is a plan. Vision Zero, Climate Action, Bicycle, Transit, Freight, Housing, Waste, Parking. Each rung of the ladder takes us higher. Now Portland is standing on the high diving board, its toes curled over the edge. We're still waiting for you to jump. Take the leap Portland. It's a climate emergency. Dive in.

Thank you,

Cathy Tuttle, PhD  
cathy.tuttle@gmail.com

**From:** [Jenny O](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Agenda Item 656 written response  
**Date:** Wednesday, July 20, 2022 12:16:36 PM

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Portland City Council:

Today you are being asked to adopt the Climate Emergency Workplan 2022-2025 as Portland's Climate Action Plan. The act of adopting the last Climate Action Plan isn't a passive act of your part. I'm writing to clarify what your responsibilities are as part of this formal adoptive process.

On page five of the workplan, there is a table which outlines the Climate Emergency Priorities for 2022-2025. The table lists each action, and includes (as one of its columns) a generalized request for the City Council. Many of these Council Requests start with "Support ..."

The word support, when used as a verb, is defined as:

1. bear all or part of the weight of; hold up.
2. give assistance to, especially financially; enable to function or act.

When voting to adopt the 2022-2025 Climate Action Workplan, you are committing yourselves to the action of supporting the actions outlined in the table. We will hold you to your commitment.

Thank you,  
Jennifer O'Connor  
Portland citizen  
Zip Code 97221

**From:** [Amy Snyder](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Written Testimony for City Council Agenda item 656 - Climate Emergency Workplan (July 20, 2022)  
**Date:** Wednesday, July 20, 2022 12:50:08 PM

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Dear Members of City Council,

My name is Amy Snyder, and I am writing today to provide written testimony for Agenda Item #656 related to the Climate Emergency Workplan. I currently serve as the VP of Marketing for Friends of Frog Ferry, which is a non-profit organization committed to improving the livability of our region with a passenger ferry service. Transportation is one of the greatest producers of greenhouse gas emissions today, both from private car use and construction vehicles. A passenger ferry service on our rivers could contribute greatly to reducing greenhouse gas emissions. Our pilot project, running one 70-passenger ferry boat from North Portland at Cathedral Park/St. John's to RiverPlace is estimated to remove 186,000 cars per year from our roads, saving over 3,000 metric tons of Co2 from our environment. This impact will greatly be magnified at our planned-steady state operations with up to seven vessels on the water. Given the urgency of impacting our climate today, Frog Ferry stands ready to put a boat on the water within a year's time. Over the past five years we have conducted all of the necessary research and reports to show that a ferry service is feasible and affordable for the public. Most recently, this past Fall, we teamed with OHSU to assess ferry demand with members of their community who could potentially leverage the services of our pilot route. Out of 700 people surveyed in or around the area of St. John's, 78% indicated strong interest in taking the ferry. There has never been a more critical time to support alternate modes of transit. Our federal government recognizes this and has allocated historic funding levels just for ferries – nearly \$300M is available. With the City's support, we can access those funds and make an immediate, meaningful impact on our environment. We hope you will consider Frog Ferry as a significant contributing factor to the City's climate initiatives. Let's work together to build a more resilient and climate-friendly community.

Thank you for your consideration.

Amy Snyder

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Amy Snyder  
[amys@frogferry.com](mailto:amys@frogferry.com)  
404.386.2997

**From:** [Carlson, Nina](#)  
**To:** [Council Clerk – Testimony](#)  
**Cc:** [Carlson, Nina](#)  
**Subject:** NW Natural written testimony for City of Portland Climate Emergency Workpla  
**Date:** Wednesday, July 20, 2022 1:16:02 PM  
**Attachments:** [Portland Climate Emergency Workplan Comments.pdf](#)

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Please add attached to the record.

Kind regards,

Nina Carlson  
[NW Natural](#)- Government Affairs  
w: 503.721-2474 m: 503.312-0683  
[nina.carlson@nwnatural.com](mailto:nina.carlson@nwnatural.com)

July 18, 2022

Mayor Wheeler  
Commissioner Carmen Rubio  
Commissioner JoAnn Hardesty  
Commissioner Mingus Mapps  
Commissioner Dan Ryan

RE: Climate Emergency Workplan draft

Mayor and City Councilors,

We appreciate this opportunity to provide comments on the Climate Emergency Workplan (the “Workplan”), and value the dedication that the City and Bureau of Planning and Sustainability have put into this Workplan. NW Natural believes that there is a climate imperative and that leveraging our modern system is essential to the City’s energy decarbonization strategy, while safe-guarding resiliency, reliability, and affordability.

As a 163-year-old company and one of the largest energy providers in our state, NW Natural has innovated and evolved throughout our history, most recently evidenced in our [VISION 2050 - Destination Zero](#), NW Natural’s Carbon Neutrality Scenario Analysis Report. We are excited to work with the City to reach its climate goals, highlight new and emerging technology, grow green jobs, and contribute to a circular economy. We understand that plans are needed to guide this work and inform the committees that look to these plans to frame their work and policy. In fact, we were encouraged to read that just this week the Oregon Global Warming Commission shared that by implementing current policies and programs already on the books, Oregon is on target to meet the state’s 2035 climate goals. There is much inspiring work occurring around the state, and more locally within our system including: deep energy efficiency work, carbon capture pilots, increasing percentages of renewable natural gas being injected into our system, hydrogen projects that will be key to decarbonizing our industrial sector and lowering the carbon intensity of the energy our customers use. With all this progress already occurring, we have been disappointed in the lack of outreach and inclusion we have experienced from the Bureau of Planning and Sustainability in crafting this Workplan, and by the important components that are missing or others that are based on erroneous assumptions.

Our concerns, questions, and opportunities for expanded partnership with regards to the Workplan are as follows:

#### Concerns

- The most pressing concern is the lack of process and collaboration regarding the formulation of this Workplan. Despite our consistent outreach to the Bureau of Planning and Sustainability, other than requesting data, we were not invited to participate in this planning process. By excluding one of the largest energy providers in our state, the planning process suffers from excluding viable solutions at a time when all options must be on the table for consideration. We are hopeful, under new direction, that a new spirit of dialogue and partnership will yield more productive results in creating an actionable and shared strategy.
- The omission of renewable natural gas (RNG) is disappointing and misguided. Renewable natural gas and hydrogen are an invaluable part of the dialogue and shared understanding for how we make the energy transition collectively. RNG is essential to meeting our energy needs while

providing decarbonization benefits -Hydrogen is an essential storage link for both the gas and electric systems as intermittent renewable electricity resources like wind and solar grow. Both RNG and hydrogen are especially important when thinking about how energy systems can work together to sustain loads on peak winter days when renewables on the electric side will be scarce. Our system is ideally designed for long-term and vast energy storage that allows renewable energy to be captured in renewable gases that can be used many months later with a supply lasting day or even weeks.

- On page 4, the Workplan “Assumes no appreciable increases in use of renewable natural gas until after 2030.” This does not align with NW Natural’s commitment to our Vision 2050 goals, nor our IRP that will be subject to approval from the PUC (which NW Natural will be bound to fulfill), drafts of which state we will be flowing a minimum of 15% RNG system-wide by 2030, including all City of Portland customers.

Similarly concerning is the lack of any mention of innovative gas technologies such as gas heat pumps for space and water heating, carbon capture technologies, and innovative building materials such as green concrete which sequesters captured CO2. Incentivizing these innovations would promote their adoption. These innovations are great opportunities for decarbonization.

#### Questions:

- What does the modeling of greenhouse gas emissions (GHG) reduction look like with the State’s newly adopted DEQ rules included, along with the gas system’s required compliance? Will Workplan goals be met simply by complying with this state mandate? Can we see the data behind the current modeling, so we understand how the City is projecting existing or implied gaps?
- What percent reduction in emissions does the City get from electrifying 10% of direct use gas load? Emissions from NW Natural residential customers in City of Portland are currently less than 5% of the City’s GHG. Based on that, 10% electrification provides a mere 0.5% reduction in GHG, for a large cost for both increased electricity infrastructure and equipment replacement. Could those dollars instead be used to increase the City’s purchase of RNG for a much larger reduction in GHG?
- How can an unfettered increase in demand on the electric grid (assuming the electricity can be cleanly produced) not run into capacity hurdles that a hybrid energy system would be naturally prepared to handle?
- How is the city working with state and regional agencies to better understand resource adequacy concerns?
- Why was a green tariff for the gas system not considered in Workplan modeling to decarbonize building space, similar to one that will be necessary for the electric system to meet the 100% clean energy requirement ahead of state goals?
- Why isn’t the City’s largest climate action infrastructure project to date (as previously reported)—RNG generation at the Columbia Boulevard Wastewater Treatment plant—included in the Workplan for cross-bureau collaboration? This demonstration project is an opportunity for education on local renewables generation and transition to a circular economy, and it is a renewables project that quite literally every person in Portland is contributing to financially and logistically - and many are contributing their food waste to fuel the process.
- Why was an auto-enrollment program (with opt out) for customers to purchase 100% clean electricity specified, but not exploration and collaboration on a similar program for gas customers, which would enable customers to purchase a larger percentage of RNG?



- Have costs for consumers been modeled and transparently discussed with community engagement for these kinds of programs at the local level?
- Wouldn't it be pragmatic to encourage a *circular economy* using waste streams such as food and compost? We are developing RNG and hydrogen projects to make use of waste and agricultural byproducts. Rather than needing to build out generation, transmission capacity, and reliability for a decades-old electrical grid, why not leverage our modern gas system that our customers have already paid for, to transport and store energy?

#### Opportunities

- Working with the City in partnership on a Clean Industry Hub - we are very encouraged by this prospect. NW Natural appreciates the Workplan giving the industrial sector time to determine the most efficient and cost-effective pathways to decarbonize.
- Partnering with Climate Trust and NW Natural's Smart Energy program to fund and expand tree planting, increasing tree canopy in East Portland.
- Working with the City, Metro and NW Natural in public/private partnership to create more streamlined collection of food, yard debris, and other compostable waste, using those waste streams to create more locally generated RNG
- Include RNG and Hydrogen as technology options for heavy-haul freight and transit. Fueling stations for these uses is another place public/private collaboration would be useful.
- Ensuring that new and existing technologies such as combined heat and power (CHP) systems, gas heat pumps, hybrid heating systems, and even back-up generators using RNG are included in designs for community buildings - to improve resiliency during extreme weather events like wind, snow or ice storms that impact the electrical system. All climate resiliency work should include these options.
- Creating incentive programs for innovative gas technologies and building materials.

NW Natural understands that the Workplan needs to be aligned to the goals in the Climate Emergency Resolution, and in fact supports and agrees with many of the resolution's action items. What we do ask for is meaningful stakeholder outreach by the City to address our concerns, answers to the questions posed above, for the City to work with us on modeling the pathways with an eye on the cumulative GHG emissions reduction from each action. We look forward to partnering with the City in good faith on the many opportunities to do climate work in our city, while ensuring our most vulnerable residents are protected and we can continue to affordably provide the energy our customers depend upon.

In the end, NW Natural believes that laser-like focus of policy and innovation on development of renewables for all energy systems is needed to decarbonize economy-wide, and we look forward to working with the City and its Bureaus to ensure that our climate commitments are fulfilled.

Sincerely,

*Nina Carlson*

Nina Carlson, NW Natural, Government Affairs

**From:** [Frodo Okulam](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Corrected email re. Emergency Climate Action Plan  
**Date:** Wednesday, July 20, 2022 7:35:24 PM

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Hello, I just wanted to correct all the typos in this email! (I was outside on my phone while watching my cat Sunny!). This should be more readable.

Frodo

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**From:** Frodo Okulam <frodookulam@hotmail.com>  
**Sent:** Wednesday, July 20, 2022 4:38 PM  
**To:** cctestimony@portlandoregon.gov <cctestimony@portlandoregon.gov>  
**Subject:** Emergency Climate Action Plan

I am concerned that the Action Plan needs more specific actions that the City will take, with follow-up oversight to make sure things actually happen. Areas I am most interested in:

Tree canopy: I am very concerned about the city ending its relationship with Friends of Trees. Why stop this program with such a good track record? Also, Portland needs an ordinance strongly protecting its large trees. I am so glad the City of Maywood Park,, where I live, has such an ordinance! We can't afford to lose any more tree canopy!

Bikes not freeways: As a long-range bike commuter (40 mi. a week to PSU), I want to see way more bike infrastructure instead of freeway expansion.

Fossil fuels: Convert all city vehicles to electric ASAP. Provide assistance to convert homes to heat pumps, etc.

These are just examples. Thank you for taking action!

Frodo Okulam [503-753-4451](tel:503-753-4451)

*Sent from my Verizon LG Smartphone*

**From:** [Janet Weil](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** testimony on City Climate Action Workplan  
**Date:** Thursday, July 28, 2022 3:16:37 PM

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I read through the City of Portland's Climate Action Workplan with interest, then increasing concern. I know you are hearing from many Portlanders about their concerns about reduction in the urban tree canopy and ending the contract with Friends of Trees, transportation issues, widening the I-5 freeway and other matters. I will comment on the part of the "workplan" that I found most bafflingly incomplete:  
the section on "**Industry.**"

**Industry** is not defined, and should include major institutions which generate significant GHG emissions, such as large hospitals, Portland's universities, and large construction projects that are not usually considered "industry." Leaving that aside for the moment, it is clear from the lack of content in this section that no one worked on developing plans to reduce emissions from industry, especially in the Critical Energy Infrastructure Hub. Why not? This is unacceptable.

The fact that 90% of fossil fuels for the entire STATE of Oregon, and 100% of its jet fuel, are located in a narrow strip of land next to the Willamette River that will **liquefy** in a major earthquake is poor planning and unsustainable, to put it mildly. There should be a PLAN to do the WORK to remove those fuels from a fragile and potentially beautiful area of Portland, and to remediate the riverbank and soils. A plan with a timeline, measurable goals, sources of funding (including state and federal), and a list of bureaus involved, including the important Bureau of Development Services. The public health and safety of residents of Linnton, NW Portland, and all communities downriver from the CEI Hub depends on real work, not blank slots on a chart.

Do better. This is a Climate Emergency, not a high school homework project.  
Written on a day of extreme heat in the Pacific Northwest.

Janet Weil

**From:** [Angela Gusa](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Climate Emergency Work Plan Comments  
**Date:** Friday, July 29, 2022 5:03:45 PM

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Hello,

In trying to do our part in reducing our carbon emissions, we're in the process of switching to an electric heat pump from an oil furnace. As we transition to electrification of our home we decided that it would be a good time to install solar panels. Unfortunately, after talking to five contractors, we're being told that in Portland, the permit process for homes built before 1970 can be unpredictable, time consuming, extremely arduous and expensive. Two of three companies referred by Energy Trust of Oregon contacted us and said they would not prepare a proposal because of the impossible permit process in Portland. The third never contacted us at all. The two companies who were willing to make a site visit and prepare estimates both warned us about hurdles that could be expensive, time consuming and in the end, insurmountable.

Built in 1915 in Grant Park neighborhood, our home is the same vintage as probably 2/3 of the homes in Portland. We have a fairly new roof and great solar access but contractors told us that without hiring engineers and most likely doing expensive modifications, we could only hope to have an installation that would cover a fraction of our electric usage.

We're told by contractors that a home with one layer of roofing that needs a new roof can have an additional layer of roofing (adding more weight than solar panels) without going through an arduous, expensive, months long permit process so this doesn't seem to be about issues with weight.

Effectively preventing homeowners in Portland from installing solar panels must be seen in the context of Portland's failure to be on track to meet carbon reduction goals. I'm including a link to the city's own progress report of July 2021 which states

“The next several years are critical if we are to meet Portland's climate goals. The City must make some big moves, including eliminating carbon from existing buildings, updating the renewable fuels standard, supporting electrification in the transportation sector, and exploring policies to reduce embodied carbon in new buildings. **These are some of the biggest and highest impact moves cities can make to contribute to carbon reduction.**

For decades Portland has been a leader in climate action, but now most leading cities are well out in front of where we are.”

[https://www.portland.gov/sites/default/files/council-documents/2021/exhibita\\_ced\\_final\\_report\\_0.pdf](https://www.portland.gov/sites/default/files/council-documents/2021/exhibita_ced_final_report_0.pdf)

One reason cited in the report for Portland's lag in progress is a lack of funding. Streamlining the permit process for private solar installation is probably the least expensive step the city could take. We're set to spend thousands of dollars of private money and reduce our carbon emissions. Many other homeowners are in the same situation.

As we spoke with contractors, we understood from them that many solar contractors are leaving Portland due to the permit process. Something is very wrong here. I'm contacting you not in the hopes of a benefit for myself, but in the interests of combating the climate crisis. I'm involved in several different organizations whose missions are around fighting the climate

crisis. This just seems like a common sense issue and the City should be cutting red tape and offering assistance in permits to encourage homeowners to go solar.

Thank you for your time and attention.

Angela Gusa

**From:** [annie](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** climate action workplan  
**Date:** Tuesday, August 2, 2022 8:14:01 PM

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First, i must say that this so-called workplan does not seem to have much "work" in it. We need action, not words. We need concrete steps that can be measured, not just vague promises. We have SO MUCH money and the potential for great things. Please totally re-do this plan and give us specific, measureable, substantive, timely ACTIONS.

If you need some inspiration, look at what other peer cities and states are **actually implementing**:

<https://rmi.org/climate-goals-states-are-setting-for-others-to-follow/>

Highlights of states leading the pack

- In [Colorado](#), transformative transportation solutions are connecting communities via cleaner, more efficient travel. A new bus system connecting cities in the state has cut Colorado's annual emissions by 460,000 tons of carbon, the equivalent of taking 100,000 cars off state roads.
- In [Illinois](#), customers in Chicago and its suburbs will see a \$1 billion break on electricity bills as a direct result of the state's Clean Energy and Jobs Act — at a time when other states are seeing up to 85 percent increases in electricity rates due to soaring natural gas prices.
- In [New Jersey](#), investments in offshore wind are already paying dividends, with the growing supply chain for offshore wind creating jobs and spurring investment in coastal communities.
- In **New York**, with the help of cities such as [Ithaca](#) and [New York City](#), the state is leading the charge on building decarbonization, with nearly \$5 billion committed to efficiency and electrification through 2025, and [state legislation](#) under consideration that would require all-electric new construction to reduce emissions and protect public health.
- In 2021, **Washington** became the latest state to adopt a cap-and-invest system for driving down emissions in nearly every corner of the economy. The state's recent [Move Ahead Washington](#) legislation has laid out spending priorities for revenues from the cap-and-invest program, committing \$3 billion to transit investments in the state that will expand alternatives to car travel and provide more mobility options for low- and middle-income households.

<https://www.bbc.com/future/article/20211115-how-cities-are-going-carbon-neutral>

- Ultra low emission zones in London
- 75 miles car-free streets in Bogota
- Passive heating of buildings in Ulm, germany
- Planting green corridors in Medellin, colombia

Please no more words, give us action!

annie capestany

portland, 97202

**From:** [Mark Darienzo](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** City's Climate Emergency Workplan  
**Date:** Saturday, August 6, 2022 2:04:22 PM

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I'm concerned about certain aspects of the plan. Caution should be taken when substituting renewable diesel to replace fossil diesel. Although many waste products can be used to produce renewable diesel, I'm concerned that if there is not enough of these waste products then land will be used to grow source products for biofuels rather than food.

Energy sources should transition to all renewables sources (but not nuclear or biofuels). PGE and Pacific Power continue to rely on coal to produce electricity for the Portland area. The City should immediately begin work on Community Controlled Local Capture and Storage Energy programs, and be ready to increase the percentage they commit to this, especially if the utilities are not on track. All decarbonization efforts must involve workforce development aspects so that the green transition creates living wage family jobs and clear career paths for advancement, especially for marginalized communities.



**From:** [Trees for Life Oregon](#)  
**To:** [Council Clerk – Testimony](#); [Commissioner Rubio](#)  
**Cc:** [Cairo, Jenn](#); [Landoe, Brian](#); [Long, Adena](#); [shade-equity@googlegroups.com](mailto:shade-equity@googlegroups.com)  
**Subject:** Our comments on the Climate Emergency Work Plan, due August 24  
**Date:** Monday, August 8, 2022 2:37:45 PM  
**Attachments:** [TFLO comments to CC on Climate Emergency Workplan August 2022.docx](#)

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Attached please find our detailed comments on the Portland Climate Emergency Work Plan. We appreciate that the City has extended the comments' deadline until August 24 at 10:25 a.m, and hope and trust that you will seriously consider these comments.

Kyna Rubin

[Trees for Life Oregon](#)



Comments on Portland's Climate Emergency Work Plan, July 2022, Exhibit A

August 8, 2022

Dear City Council:

We appreciate all the work that City staff have done on Portland's Climate Emergency Work Plan. As the Plan states, "the time is now" to take action to address how to mitigate heat impacts on our city.

We agree that cutting carbon emissions by improving mass transit and pedestrian ease is important. But if such improvements exist in a sea of concrete and asphalt, they will not provide cooling, storm-water mitigation, and filtering of air pollutant and noise. These environmental services are crucial for climate resilience and human health. They are best ensured by large-form trees and green spaces.

Large-form trees, which grow more than 50 feet tall and live for more than 75 years if given the space and conditions to do so, provide significant human health and environmental benefits that dwarf those of small-form trees. Space for large-form trees in our rights-of-way near where people live--not only in our parks or distant natural areas--should be given equal priority with other climate measures such as solar panels, paint for streets, roof membranes, and heat pumps. Large-form trees take time to reach their full environmental services potential, including carbon storage. That's why the time to make room for them across the city is *now*.

As a whole, the Climate Emergency Work Plan appears more aspirational than an actual blueprint for managing projects throughout the city in a new way that addresses the extreme urgency of the climate crisis. We don't need another call for climate action, we need specifics. Moreover, the plan does not address the way the City bureaucracy itself is deeply entrenched in only enforcing minimum code requirements rather than looking for ways to maximize opportunities that go beyond such minimums. Emergencies demand solutions that go beyond the status quo.

Nor does the plan articulate new, creative ideas for how the City will meet its climate goals. For instance, nowhere in this plan does the City model specific ideas for how our buildings, sidewalks, streets, and parks might be redesigned to still be livable in the extreme climate conditions we are beginning to experience. Pilot

projects provide a way for the City to model best practices and evaluate what works and what doesn't but no pilots are mentioned in the plan. The Work Plan must name at the very least a handful of sites or areas where new designs will be tried and evaluated within the next few years for their impact on human health and living conditions.

Change comes from on-the-ground redesign, not from broad directives. The City must design space for large-form trees within 100 feet of housing, workplaces, and institutions, starting with the rights-of-way. Importantly, to increase space for large-form trees, the Work Plan must reduce impervious area. The Title 33 zoning code does not regulate impervious surface coverage. Unless action is taken to do so, our hottest, most vulnerable neighborhoods in East Portland, slated for high-density development, will be cursed with increased impervious surfaces just at the time they need *more* green, not less.

In order for any real change to take root in how the City does things, the Work Plan should include an inter-bureau design and implementation checklist to be used for every new individual project. Every check-list must include how the project's design will enhance or detract from the urban forest, which is essential to our climate resilience. Proposed projects should be evaluated on how far beyond merely fulfilling minimal code requirements they go. Serious, effective emergency planning and action require that smarter, innovative design to accommodate space for large-form trees (or at least medium-form trees) be applied from the very start to all new development and capital improvement projects.

No less than an on-the-ground design revolution is required to meet our climate emergency. The Work Plan should stipulate pilot projects that result in large-form trees in the ground with guaranteed City maintenance in low-canopy areas. The plan should state specific ways to achieve this end along transportation corridors. For instance:

- PBOT and Urban Forestry together should look for one-way streets perpendicular to transportation corridors to serve as pilots for more climate-adapted design. Such streets would still have a bike lane and on-street parking but one lane could be used to make room for 8-foot or wider treeways on the non-powerline side of the street. These wider planting strips would allow planting of large-form trees big enough to shade the entire street.
- On streets where planting strips are less than 6 feet wide, PP&R should purchase on the side of the street without powerlines 2 feet of frontage across the front of the

adjoining lot(s) to enable the planting of large-form trees. These wider strips will reduce sidewalk conflicts and costly repairs. The larger trees that can be planted also will be able to shade and cool the street and surrounding buildings far better than small-form trees can.

- PP&R should pilot the purchase of treed lots in low-canopy neighborhoods near transportation corridors for the purpose of creating pocket parks that function as large-form tree canopy reservoirs that clean and cool air.
- BES should lead in piloting creation of island canopy reservoirs in institutional parking lots where stands of at least three trees are possible. Any City-owned parking lot should be first in line for such a pilot. BES should maintain the trees if the island is a stormwater facility, and PP&R if the trees are planted at curb level.
- PBOT, BES, and PP&R/UF should cooperate in installing shaded electric car charging stations to make the connection between carbon reduction and trees.
- Affordable housing should be required to have one or more large-form trees to benefit residents. This would be supported by an easement system.

### *Specific Language and Other Changes*

In addition to creating a much bolder and more specific emergency work plan, we would like to see the following changes in the text:

--Combine the “Trees T” items now on p. 13 with Natural Resources/Green Infrastructure (NR) items to reinforce that trees are infrastructure on an equal par with other infrastructure when designing roads, sidewalks, and buildings. All City bureaus must be required to treat trees this way *or little will change*.

--T-1 (p.13). Change Action text to this: “Expedite updating and implementing the Urban Forestry Management Plan and ensure that it is informed by the science showing the public health benefits of living and working near large-form trees.”

--T-2. Change Action text to this: “Update Title 11 regulations to improve tree preservation and require that all new development and capital improvement projects are designed to include adequate space to hold large-form trees.”

--T-3. Change Action text to this: “Accelerate tree planting in East Portland and other priority neighborhoods through existing and additional funding, and ensure these efforts include partnering with community organizations with the capacity to

plant trees. In these tree-planting target areas mandate greater space for large-form trees in the right-of-way.”

--Add a T-4 whose Action reads: “Expedite City funding to maintain street trees across the city. Maintaining essential public infrastructure like street trees should not be left to property owners, many of whom are unable to afford such maintenance, a factor that contributes to canopy deterioration and wasteful tree-planting efforts.”

--Add a T-5 whose Action reads: “Using creative design, preserve more public space in the right-of-way for large-form trees in new projects such as the transformation of 82<sup>nd</sup> Avenue from a state highway to a City-owned corridor.”

--Land Use-1: [add to end of Action text]: “All such plans must require heat reduction approaches that include preservation of large-form trees and space to plant new ones. This is especially essential in plans to improve major East Portland corridors such as 82<sup>nd</sup> Avenue and other important north-south corridors.”

--IP-1: Change Action text to this: “Incorporate information about rapidly changing weather patterns resulting in flood risk, canopy loss, and heat islands. These changes compromise environmental and human health and their effects must now be taken into account in all capital planning and infrastructure design by incorporating tree canopy.” Under the Why This Matters column, add to the last sentence the italicized words here: “This includes evaluating the social cost of carbon ... and repair for assets *such as trees killed or damaged* by climate stressors.”

--H-1 (p. 16). Add the italicized words here to the last sentence under Action: “... such as landscaping *including large-form trees, which at maturity grow tall enough to shade buildings*; construction type, and resident practices.”

In closing, the Climate Emergency Work Plan reflects some of the broad knowledge we already have amassed but it will not bring about the kind of bold changes this emergency requires. These changes must occur on the ground, and therefore must be imbedded across City codes, which climate crisis has rendered out-of-date. But we won’t move the dial here unless and until codes are rewritten and practices revamped to reflect the crisis we’re facing.

Sincerely,

Kyna Rubin on behalf of [Trees for Life Oregon](#)

**From:** [Keith Wilson](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Support for Portland Climate Emergency Workplan  
**Date:** Monday, August 8, 2022 3:30:40 PM

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**Support for the Portland Climate Emergency Workplan – Specifically for the update to the Renewable Fuel Standard (RFS) to phase out fossil diesel fuel by 2030. Which, if replaced with renewable diesel, could reduce diesel emissions 60 percent at no cost**

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

Our Portland environment is in crisis.

We must recognize a universal truth: Actions drive consequences. Industrialization, global trade, and population growth have negatively impacted the sensitive ecosystems that we are dependent upon. Absent direct action, soon our air will become increasingly hostile, our lands increasingly barren and our seas increasingly lifeless — and rising. These are facts, not opinions.

It is already happening. In June of 2021, Oregon endured a record-breaking heat dome that caused 96 deaths, the majority of those occurring in the Tri-County area. Instead of fall we now have "fire season," and chronic drought is now the norm in many parts of Oregon.

Portland's Climate Emergency Workplan's update to the Renewable Fuel Standard (RFS) to phase out fossil diesel fuel by 2030 is a straightforward solution that will have an immediate impact by gradually shifting petroleum diesel users to lower-emission and available substitutes like renewable diesel.

Renewable diesel works in any truck engine, needs zero engine modifications, will be available at the same fuel pumps used today and will cost the same or less per gallon. In addition, vehicle maintenance costs will fall as it burns cleaner in diesel engines. Unlike biodiesel, which is made using a different process, renewable diesel does not require blending and can be used as a drop-in replacement for petroleum diesel.

TITAN Freight, the company I own and operate, has experienced only 100% positive reviews from our team members and mechanics, the true experts in this discussion.

Renewable diesel is made from feedstocks like animal fats, vegetable oil, and used cooking oil. Looking forward, it can also be created from feedstocks like municipal garbage and wood waste. As the largest timber-producing state in the nation, Oregon has the potential to transition from being purely dependent on petroleum diesel imports to being self-sufficient and energy independent.

We have implemented similar policies time and again. We removed the lead out of paint and still use paint. We have removed the lead out of gasoline and still use gasoline. It is time we remove the dinosaurs out of diesel because we still must rely on diesel to power our economy.

Electric trucks are the future but will take time. Until then, why not rely on a lower-emission fuel? Renewable Diesel has 60 percent less greenhouse gas than petroleum diesel. Switching to renewable diesel can make an immediate impact and every Portlander will enjoy environmental benefits and long-term health savings associated with cleaner fuels and safer air.

The City of Portland, City of Eugene, ODOT, TriMet, as well as many Oregon businesses has

already switched their fleets to renewable diesel. Ask any one of them and they will tell you it performs like "magic."

We must confront the effects of climate change in Portland. Our approach to making significant gains does not need to be costly, overly complicated, or painful. Together we can put in place smart policies such as the Climate Emergency Workplan to move us toward a more secure, more sustainable future.

Assuring you of my best intentions,  
Keith Wilson  
President & CEO  
TITAN Freight Systems, Inc.

**From:** [Felicity Quartermaine](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Written testimony on Portland City Council's Climate Emergency Workplan  
**Date:** Wednesday, August 10, 2022 10:06:48 AM

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In the two critical years since the passing of the Climate Emergency Declaration, the City can point to few, if any, concrete policies that will result in a substantive decline in emissions, which according to the IPCC needs to begin by 2025 and be halved by 2030. This is unacceptable. We need and demand specific action steps and measurable results.

What is labeled a “workplan” is a vaguely aspirational document, short on specifics. The CED first-year 2021 report was basically that as well; neither has resulted in concrete policies to reduce emissions. **The City Council must create a Climate Emergency Commission** with the best available experts and stakeholders to work with them on concrete action steps, measurable outcomes, and timelines to reduce the city’s greenhouse gas emissions.

Portland’s recent budget process in a ***SURPLUS*** year found the City government bragging about a .06% investment in climate related programs. Only a very small percentage of that is slated for emissions reductions or climate mitigation efforts, not very indicative of a full-blown Emergency Response. Many assumptions made in their decarbonization model need more information, and some of which could be challenged. The Police Bureau, which has its own airplane (why??), and other bureaus are omitted from this workplan, even though they consume a large percentage of general fund resources.

Only in the transportation sector does the workplan suggest



anything close to a 50% reduction by 2030. Even there, the specific actions under T-1 and T-4 are very vague. Sixteen percent of their proposed transportation reductions rely on an update of the Renewable Fuel Standards. As research scientist [Richard Plevin](#) and other experts have pointed out, renewables come with their own set of climate issues. If the City is relying on the corporate nonsense that Zenith and other corporations quote on the emissions reductions levels, this is totally not to be trusted. That 16% reduction in the model needs to have assumptions carefully vetted, and the City needs to work with Dr. Plevin and others to set good policies that account for the complexity of renewable fuels. It is good that they plan to implement the Pricing Options for Equitable Mobility ([POEM](#)) recommendation: a 20-cent fee on parking meter transactions to send an initial price signal about the costs of driving. But we wonder about the timeline for various parts of that, which include:

- Expanding affordable housing [Transportation Wallet](#)
- [BIKETOWN for All](#)
- Multimodal [infrastructure projects](#)
- Research and policy development to inform additional pricing, equitable mobility, demand management, and affordability programs

**BIOFUELS:** Part of the City’s climate action work plan relies on “replacing petroleum diesel at the pump.” The council is requesting “update the renewable fuels standards.” While updating the renewable fuels standards great care must be taken to study this first, and be very cautious about relying on renewable fuels or bio-diesel. There are many different types of renewable fuels and biodiesel, which include major issues.

Some of these can actually have a greater negative impact on climate. Biofuel is NOT a silver bullet.

Some of the issues:

1. Induced land use change – cutting down forest to plant fuel stocks, or replacing crops grown for food with crops grown for fuel
2. Can have harmful emissions same as fossil fuels
3. Similar explosive hazards, does not belong in an earthquake liquefaction zone
4. Easy way for fossil fuel infrastructure companies to hide fossil fuel activity; Zenith Energy is doing just that
5. Having more bio-fuels to the mix may drop prices so people will just use more of all fuels
6. Fossil fuels used to grow the feedstock crops often have higher climate impacts than the biofuels produced from those crops

We need to transition away from burning stuff to get around, whether fossil fuels or biofuels.

Few concrete emission reduction actions are presented in the Buildings sector and what they actually will do (for example in B1 and B2) in terms of emissions reductions. We have concerns from our participation in the Build Shift process. See below under B2 there is talk about eliminating carbon in City operations but again no concrete action plans, measurables, or timeline.

The Industry section is incomplete and unacceptable. Behind

the scenes the City Council killed off the Portland Clean Air Protection Program. Businesses and industry should not be able to get off the hook for the next 10 years with no expected reductions in emissions. That's ludicrous. The City needs to institute some sort of emissions fees policy asap.

**TREES:** We are disappointed in the vagueness of the sequestration and trees section of this document. Despite calls by the Shade Equity Coalition, there is no mention of street tree planting maintenance. The new Parks tree planting program is committing to less than half of the number of plantings that Friends of Trees has done in the past. Most importantly, there is no commitment to inventory and preserve giant old trees and community shade equity and sequestration resources, even if they are on private property. Waiting two years to begin the tree code revision process is unacceptable unless a moratorium is placed on the cutting of old giants. Look at what Milan, Italy is doing: planting 3 million trees –strategically – by 2030. Can't we do better?

**CONCERNS ON BUILD SHIFT:** We are concerned that discussion was tending to point towards 2026 as the Build Shift implementation target for carbon emissions reductions, since science says there needs to be a significant downturn in emissions no later than 2025 and halved by 2030. Pushing back timelines will result in serious consequences. A ratcheting-down approach of annual decreases starting now is critical, as benefits from reductions will not be seen quickly. We agree with the concept of incentivizing early action. The City needs to have policies in place that will begin a downward decline as soon as possible through private/public

partnerships, as well as encouraging the use of PCEF funds in this critical arena.

**BUILDINGS:** Since there is baseline data on commercial buildings, we would recommend plans to start there in 2023 with commercial buildings of 20K square feet (sf) and above, then phase in 10K sf commercial buildings and 20K sf large multifamily rentals two years later, eventually going to 5-unit buildings before 2030. As soon as possible, put into place Resource Centers for both owners and renters.\*

**TENANT/LANDLORD SOLUTIONS:** While we understand the systems life cycle benefits of a customized, internal-based approach to emissions decline, we are concerned both about the ongoing energy cost burden on tenants (ranging from 18-45% of necessary budget expenditures) as well as not adequately reducing emissions on the schedule required by climate science. Landlords should not be able to continue to defer maintenance or delay as long as possible the big ticket items. Short intervals of 2-3 years requiring 10-15% emissions declines in each interval are recommended.

However, we also recommend allowing flexibility in terms of how building owners are going to achieve these reductions, through a customized approach addressing lighting, building envelope upgrades, mechanical upgrades, operations upgrades, and the like, benefitting from cost savings that can be utilized for additional upgrades. Compliance fees will ensure that owners remain on task in meeting building performance standards. Likewise, inspections and compliance certification processes need to be developed. Any owner support should

have tenant protection agreements both to prevent displacement or owners passing along higher costs.

**METHANE:** The City should work with Multnomah County to develop health standards to prevent “natural gas” (methane) appliances in new construction (as is being done in NY, CA and Eugene) and begin phasing out natural gas from existing homes. Science makes clear that ventilation and even filtration are not sufficient solutions to the health and climate issues posed by methane, particulate matter, and nitrous oxide. Other communities are working to provide small heating and cooling geothermal districts using existing natural gas infrastructure as a possible transition. The City should work with the County on this for indoor air quality as well as emission reductions. Any cooling standards developed must ensure that cooling sources are energy-efficient and not adding substantially to climate impacts. We support heat pumps, safe renewables, passive designs, and conservation methods to ensure that the long-range costs and climate and health consequences for tenants are not adding harm.

**COMMUNITY ENERGY SOLUTIONS:** The City should immediately begin work on Community Controlled Local Capture and Storage Energy programs, and be ready to increase the percentage they commit to in this, especially if the utilities are not on track. All decarbonization efforts must involve workforce development aspects so that the green transition creates living wage family jobs and clear career paths for advancement, especially for marginalized communities.

**ENERGY:** The City makes a huge point out of the necessity

of decreasing energy supply from fossil fuels towards clean renewable sources. The focus is on Portland General Electric which may be around 2/3rds of Portland's households — this is based on comparing service areas, although Pacific Power area of N/NE Portland is denser than areas of the West Hills for example. Pacific Power's parent company PacificCorps presents misleading information on their renewable claims for Portland area, given that PacificCorps' plan for western states is to continue to burn coal for years, then transition primarily to natural gas and nuclear.

PGE plans to continue their Colstrip, MT coal mine units 3 and 4 until 2034. PGE's 2019 Integrated Resource Plan (IRP) states its emissions will still amount to about 4+ million metric tons (MMT) of CO<sub>2</sub> in 2030, 2.5 MMT of CO<sub>2</sub> in 2040, and almost 2 MMT of CO<sub>2</sub> in 2050. More detailed study of utility IRPs will be needed to see how they expect to get to the promised transition. A huge gap falls between what is promised here and whether or not utilities will meet the state's Climate Protection Plan goals (which are not strong enough according to the more recent IPCC reports), especially since the utilities are actively fighting these in court. The City should immediately begin work on Community Controlled Energy programs, and be ready to increase the percentage they commit to.

**WHAT OTHER PLACES ARE DOING:** The City should look at what other cities and states are actually implementing as they consider their own action plan! Communities in California have created their own energy districts and utilize the profits for the common good—climate and social justice.

Kauai, Hawai'i has brought consumer energy costs down by focusing on community solar and reselling residential and offpeak surplus to other utilities or businesses. Portland can and must do better!

Sincerely,

Felicity Quartermaine

**From:** [Reuben Peterson](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Testimony for City Climate Emergency Work Plan  
**Date:** Tuesday, August 16, 2022 6:56:30 PM

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Hi, I would like to give testimony concerning the Climate Emergency Work Plan. The work plan is severely lacking effective well defined solutions and realistic timelines. Just to pick one issue, biofuels do not help the environment at all! But the biggest problem is the total lack of any significant monetary investment. We need a 50% reduction of emissions by 2030, but the work plan only spends 0.06% of the budget on climate change related programs -- and only a fraction of that specifically for emissions reductions. Why are we spending so little when we have a budget surplus? Where is the commitment or the urgency? This is a preventable emergency. It is much easier to put out a fire than allow it to destroy a city and rebuild with the survivors.

Reuben Peterson



**From:** [Yehudah Winter](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Climate Emergency Plan  
**Date:** Wednesday, August 17, 2022 5:40:36 PM

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I'd like to thank the city for moving on this and advocating for more urgency in developing and implementing a plan that allows us to meet carbon reduction and equity goals.

My questions are: How will the specifics be developed? Will each agency (like TriMet) develop plans related to their domain ? Who will monitor and evaluate them? How will the City inform and involve the public?

Thx,  
Yehudah (Alan) Winter  
(503) 287-8737 (cell)  
[www.yourpersonalceremony.com](http://www.yourpersonalceremony.com)  
Like Compassionate Listening Oregon on FaceBook

Knowing that you love the earth changes you,  
activates you to defend and protect and celebrate.  
But when you feel that the earth loves you in return,  
that feeling transforms the relationship  
from a one-way street into a sacred bond.

ROBIN WALL KIMMERER

**From:** [Garlynn Woodson](#)  
**To:** [Council Clerk – Testimony](#)  
**Cc:** [com.rubio@portlandoregon.gov](mailto:com.rubio@portlandoregon.gov)  
**Subject:** Comments on Portland's Weak Climate Emergency Work Plan  
**Date:** Wednesday, August 17, 2022 6:02:53 PM

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Dear BPS and leadership,

Your first Climate Emergency Work Plan claims to understand that there is a climate emergency and that it's time for Portland to act like it... but, this sense of urgency does not carry through the document.

I understand that BPS is just one bureau, working within a byzantine multi-bureau bureaucracy that is deeply dysfunctional and incapable of handling existing responsibilities, much less quickly implementing systematic change in response to an emergency situation. City staff prioritizes time off, vacations, seniority, union roles, and pretty much any other excuse that can be found for dysfunction, and is not empowered to take initiative to create the change we need to see. Bureau leadership tends to see their jobs as making excuses for dysfunction, not creating the change we need to see. Elected officials have little to no understanding of the issues, and make decisions based on campaign contributor advice, rumors, superstition, and the advice of near-sighted bureau leaders, under the best circumstances.

So, I have zero confidence that you will implement these recommendations. But, here goes anyways. This is not exhaustive; it's selective. Your staff should sense the spirit of these recommendations, and extend that spirit to the rest of the document.

Buildings:

B-1 Eliminate carbon from existing buildings in the private market.

There is no plan here. This is a critical policy element, one that could deliver more than a third of the required emissions reductions to meet our goals and... there's just a description of some process. No goals. No funding. No details on the plan. Nothing. This is a plan to fail.

B-2: Eliminate carbon from City operations.

There's no plan or goal here. Might I suggest, commit to replacing the entire City fleet with zero-emission vehicles by 2030, to fuel switch from natural gas to electricity for all City buildings and facilities by 2030, to replace all city-owned equipment that uses fossil fuels with electric alternatives by 2030, and to cease the use of all products derived from fossil fuel inputs, including pesticides and herbicides, by 2025? You need teeth in this plan, not just blather.

Transportation:

T-1: Make low-carbon travel options safe, accessible, and convenient for all Portlanders.

“Support allocation of space on city streets for...”

What? This is not advocacy. This is policy. Support is not needed. What's needed is action.

How about, “Re-prioritize the allocation of space on city streets to ensure that bicycles, pedestrians, and transit are given top priority for space allocation, and that when conflicts occur, automobile modes are given the last priority for space allocation, including closing streets to cars completely if necessary to accommodate other modes.” This is not radical. This is a best practice from jurisdictions around the world that have successfully achieved the mode splits that Portland desires, as articulated in the Portland Plan, the 2030 Comp Plan, and the 2030 Bicycle Plan. If you’re not willing to say these words, then you are unserious about achieving these goals. Study the best practices. You will not find a single jurisdiction that has achieved the desired mode splits without committing, in practice, to the meaning of these words.

T-3 Decouple transportation funding from fossil fuels.

This is a good long-term goal, but it misses a critical short-term point: The price of fossil fuels needs to rise dramatically to dis-incentivize its use, and encourage the use of fossil fuel alternatives, during this critical transition period. What that means, is that Portland needs to publicly articulate that its gas tax will rise to \$10 per gallon by 2030, with a price increase every six months. That will give certainty to the community that the price is never going back down. This revenue should be used entirely for capital projects to re-build our infrastructure to deliver the mode splits envisioned by the Comp Plan. Once the community stops using fossil fuels, many many capital projects will have been delivered. Long term maintenance can be funded by user/curb fees as the long-term strategy, but don’t neglect the CRITICAL need to dramatically increase the cost of fossil fuels. Give Metro the option to opt in to this program to make it regional; issue kicker checks to low income households, funded from program revenues, so they have the means to pay for their own transition off fossil fuels. This will make this policy extremely equitable.

T-5: Support state and regional vehicle miles traveled (VMT) reduction policies.

Stop passing the buck. Right now, through a Council vote, the City could on its own stop using Level Of Service (LOS) to evaluate transportation system changes. This must happen immediately. In the resulting policy vacuum, the modal hierarchy diagram will function until a better option can be developed. The City and its partners have been using the excuse of “we’re working on a replacement for LOS” for over a decade now. It’s time to stop making excuses, and time to take action. **DO NOT ACCEPT ANY MORE EXCUSES FOR INACTION FROM STAFF.** Take the action that is required. This will force the City’s partners, in turn, to also stop making excuses and begin taking action.

LAND USE:

LU-2: Work with existing communities to avoid economic and cultural displacement as neighborhoods grow and change. Develop strategies to ensure that new development better reflects the full range of people and cultures in Portland and is more accessible to people at all income levels.

This is written as if nobody knows what the right answer is. Seriously? Don’t you have any experts left on staff? Didn’t anybody conduct a literature review before publishing this draft? For crying out loud. If you want to reduce displacement, you need three things:

1) Land trusts

- 2) Cooperative housing
- 3) Low-interest financing to allow existing residents to purchase their apartments as a cooperative, and for land trusts to purchase opportunity sites to land bank until new cooperative housing and community-centered commercial space can be brought to market on each site.

EMBODIED CARBON/FOOD

S-2: Reduce food waste through business and residential composting and the donation of edible surplus food.

“Continue to suport...” Again, this is not advocacy. This is governance. BPS has had the ability to spin up a residential food composting program for multifamily buildings for over 25 years, and has chosen not to do so. Don’t point fingers. Own up to this. Implement a food composting program for apartments and businesses by 2024, or stop using the word “Sustainability” in your bureau title.

Right now, this document is just a bunch of B.S. that will not change anything. Was that your intent? If not, prove it: implement my edits, and go beyond what I’ve suggested here. I’m volunteering my time to make these suggestions. You have paid staff in your employee who are highly trained professionals, who I’m sure could go much further with the resources available to them. Empower them to do so.

Thanks,  
~Garlynn

:::~::~:  
Garlynn Woodsong  
5267 NE 29th Ave  
Portland, OR 97211  
Cell: 503.936.9873

**From:** [Portland Youth Climate Council](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Public Comment Submitted for the Climate Emergency Draft Workplan  
**Date:** Wednesday, August 17, 2022 8:26:49 PM  
**Attachments:** [Public Comment Submitted for the Climate Emergency Draft Work Plan.docx](#)

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Dear City Council,

We appreciate the work that the Bureau of Planning and Sustainability has done to lay out the urgent need for bold immediate action to address the climate crisis; however, after reading the work plan, it is clear that providing the funding and people-power needed to protect our future by addressing the climate crisis is still not seen as a priority in Portland.

Over the last decade it seems that Portland has become a city willing to pass aspirational resolutions, but unwilling to follow up with meaningful action. This is particularly true with action to address the climate crisis. When the Climate Emergency Declaration was brought before Council in 2020, PYCC members testified, stating “*When people ask us what the City has done to fight climate change, we can’t point to our resolutions. We must be able to point to the actions that we have taken that were outlined in our resolutions*”. It has now been two years since the Climate Emergency Declaration was passed and there is very little tangible progress to show for it. Furthermore, the current proposed “work plan” is not truly a plan, so much as another aspirational document without timelines, specific actions, or funding to effectively address the climate crisis by reducing emissions and mitigating its worst impacts. In order to create a better future, we need to have a tangible work plan that is fully funded, with a specific timeline that clearly demonstrates how progress will be measured.

Collaboration and working together are basic skills taught in school, even when (perhaps especially when!) we are frustrated with our collaborators, the project, or other aspects of the situation. Collaboration between bureaus is vital to the success of this plan and for our futures.

Yet, in most meetings we have had with City officials, adults have shared their frustration with the lack of collaboration and cooperation between bureaus. One seemingly straightforward example: our City bureaus can’t even come together to figure out how to protect and plant trees to grow our urban forest. Effective response to the climate crisis will require integrated and coordinated action, but there is nothing in this document that requires or even encourages coordination and collaboration across bureaus.

Five years ago, at the passage of the 100% Renewable Energy Resolution, Mayor Wheeler said “*We’re actually going to need to make deliberate steps, deliberate investments, and deliberate policy changes*” to switch to renewable sources of energy. This plan is *not* deliberate - it does not have deliberate steps, it does not make deliberate investments, and there is nothing in it that will guarantee deliberate policy changes. If the Mayor meant what he said at the passage of the 100% Renewable Energy Resolution (yes, another aspirational, but unenforceable resolution!), his commitment must show up in specific actionable policies, supported by adequate funding and staffing.

Please do better,  
Portland Youth Climate Council



Portland Youth Climate Council

*PYCC is a youth-powered group, based in Portland, Oregon, defending our right to a stable climate and sustainable future.*

[pdx.climate.council@gmail.com](mailto:pdx.climate.council@gmail.com)

## Public Comment Submitted for the Climate Emergency Draft Work Plan

We appreciate the work that the Bureau of Planning and Sustainability has done to lay out the urgent need for bold immediate action to address the climate crisis; however, after reading the work plan, it is clear that providing the funding and people-power needed to protect our future by addressing the climate crisis is still not seen as a priority in Portland.

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Please do better,  
Portland Youth Climate Council

**From:** [jean trygstad](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Climate Emergency 2022-2025 Plan testimony  
**Date:** Thursday, August 18, 2022 11:33:08 AM

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Greetings,

I have read the plan and make the following requests of the City Council.

Land Use LU-1. I ask the City Council to prioritize the Lower SE Rising plan over the West Portland; if funding exists for both then start the SE Rising Plan first and if there is not funding for both choose SE Rising. Why? Because it is common knowledge that SE residents have received far fewer resources over the decades than West Portland.

Transportation T-9 Do your utmost best to get going in 2023 on reducing the use of diesel fuel it is responsible for the majority of soot pollution. I live near the Barbur Blvd and I-5 corridor and along with my neighbors would like to breath cleaner air.

Thank you

Jean Trygstad

Sent from [Mail](#) for Windows



**From:** [Jynx Houston](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** CLIMATE PLAN  
**Date:** Thursday, August 18, 2022 11:56:50 AM

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IT IS CRITICAL THAT ANY CLIMATE PLAN PUT FORTH BY BPS INCLUDE CLEAR & URGENT PROVISIONS FOR SAVING ALL TREES IN PORTLAND. IT IS UNCONSCIONABLE THAT SO MANY TREES ARE BEING ALLOWED BY DEVELOPERS TO BE REMOVED. THIS MUST STOP FOR THE OBVIOUS BENEFIT OF EVERYONE LIVING IN PORTLAND.

Jynx Houston  
7605 SE Lincoln St.  
Portland 97215  
503 477 9268

**From:** [Cathy Spofford](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Climate Emergency Workplan  
**Date:** Thursday, August 18, 2022 3:05:27 PM  
**Attachments:** [Print ready map.pdf](#)

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Mayor Wheeler and City Commissioners,

Thank you for beginning to develop a Climate Emergency Plan. In your document you state that "We are living in a climate emergency. It's time for Portland to act like it". I totally agree with this statement but feel the plan falls short on specific steps and measurable results. Part of the Climate Action Plan relies on replacing petroleum diesel and updating the renewable fuels standards. I think we need to be cautious about relying on renewable diesel or biofuels. Both renewable diesel and biofuels can have harmful emissions, the same as fossil fuels. They also have similar explosive hazards. If land for growing crops is used instead to grow feedstock for biofuels or forests are cut down then biofuels can be as harmful to the environment as fossil fuels. Zenith Energy is one company touting the use of biofuels. They are located in the CEI HUB and as the City and County's own report, The CEI HUB Seismic Risk Analysis, shows that the risk of having any type of fuel in an earthquake liquification zone is significant. If the City truly believes we are in a climate emergency I would like to see plans to close Zenith Energy (they only use Portland as a pass through for dangerous oils) and concrete steps to monitor and phase out the other storage facilities in the CEI HUB. Attached is a map produced by the Zenith Workgroup, a member of Cedar Action, that outlines the history and risks of the CEI HUB. I hope that you will read it and take a walking and driving tour of the area.

Sincerely,

Cathy Spofford  
Portland, OR

# VISIT ZENITH ENERGY AND THE CEI HUB And Get to Know Our Neighbors

The *Critical Energy Infrastructure Hub* (CEI Hub) is a six-mile stretch along the west side of the Willamette River. This place has deep cultural significance for many Indigenous Peoples. Where there was once a bountiful hunting, gathering and trading center for First Peoples of the Pacific NW, ten major fuel terminals clustered here now store 360 millions gallons of fuel—90% of Oregon's liquid fuel and 100% of the aviation fuel for Portland International Airport. Zenith Energy, which is located here, has historically transported crude oil from the Bakken oil fields in North Dakota and Canadian Alberta tar sands.

The CEI Hub was built before we understood this region's earthquake risk from the Cascadia Subduction Zone and Portland Fault. Significant parts of the Hub are built on landfill, in what used to be lakes, wetlands and small communities along the river. What seems like solid ground will liquify when an earthquake occurs.

A report on the CEI Hub funded by the *Portland Bureau of Emergency Management and Multnomah County Office of Sustainability* came out in 2022. It states that there are 630 storage tanks at the CEI Hub. Of the tanks in use, 91% were built before seismic standards were adopted. Some of the tanks are 100 years old. In an earthquake, tanks may rupture. As many as 193 million gallons could be released. This fuel may explode and burn. Death and serious health effects are predicted. Fuel and toxic substances would go into the air, water, and soil, harming wildlife and polluting our environment for decades. Forest Park, our river and streams, and nearby communities would be decimated. The lack of our stored fuel will cripple our entire State's recovery.

Corporations at the CEI Hub aren't required to make their tanks meet earthquake safety standards, nor are they responsible for the risks they pose to human life and safety. Let's face our situation.

## WHAT CAN YOU DO?

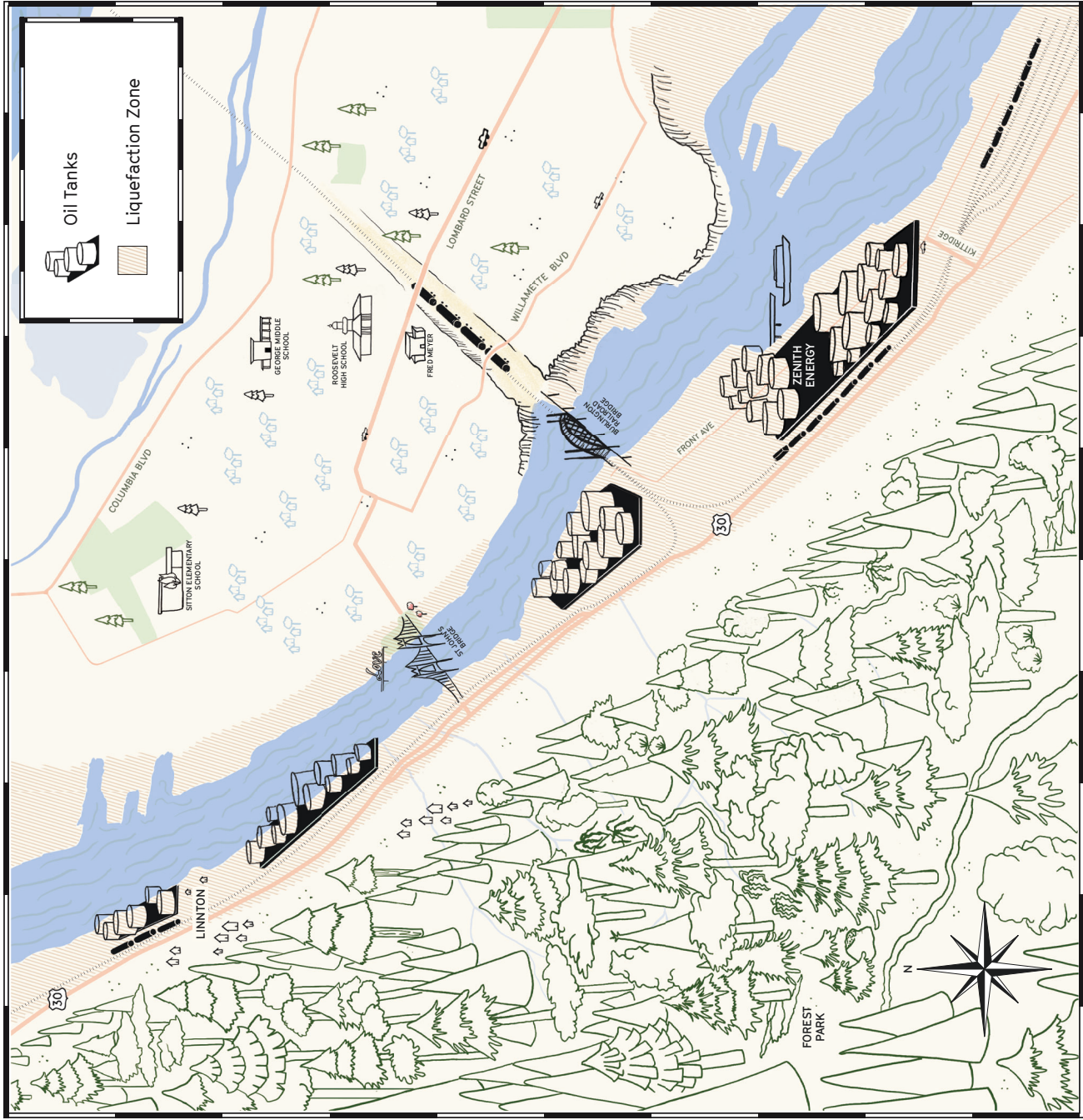
Ask political candidates and elected officials what their plan is to protect our city and region from volatile fuels at the CEI Hub. Ask them when Zenith will stop operations. Ask them when the tanks will be moved or seismically upgraded.

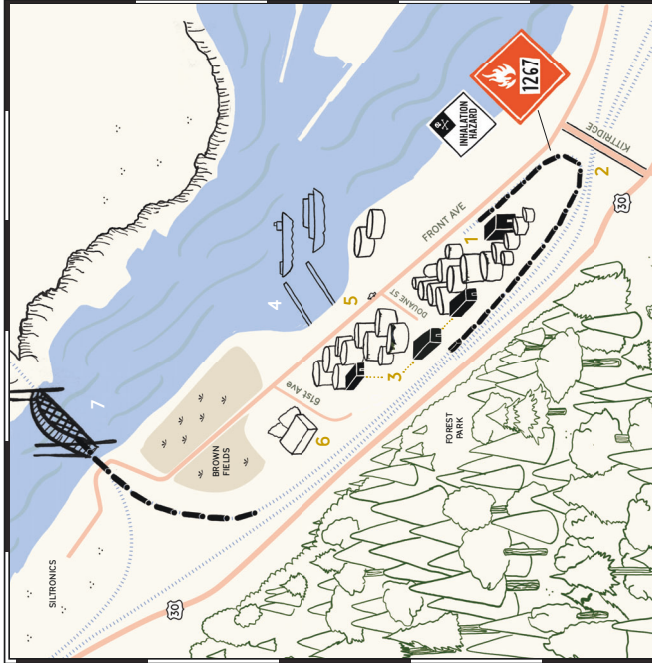
This document was created by the CedarAction Zenith Work Group. Get informed and join us: [zenithworkgroup@gmail.com](mailto:zenithworkgroup@gmail.com)

XRPDX.org and 350pdx.org are sources of information and current action.



Visit our website to learn more and read the report.





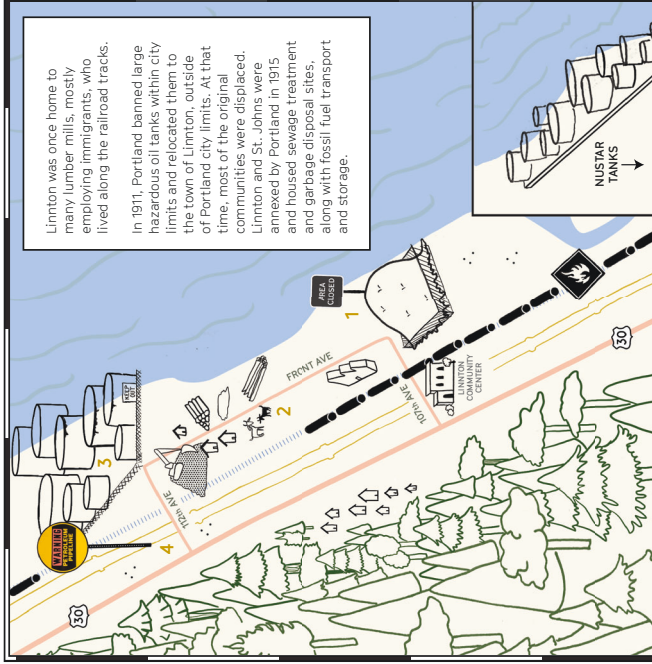
### TOUR 1 Zenith Energy in CEI Hub 5501 NW Front Ave

A Mostly Driving Tour With Some Walking

Drive over NW Kittredge Bridge (at Rte. 30 and NW St. Helens Road) and turn left on NW Front Avenue. Park in the little strip mall to your left. Walk to NW Front Ave., turn left, and you are at Zenith Energy.

- ZENITH ENERGY** 5501 NW Front Ave  
Zenith receives Canadian tar sands and Bakken crude oil from North Dakota by rail and unloads it into storage tanks. Zenith's 84 storage tanks hold more than 63 million gallons of fuel. None of this crude oil is used in Oregon. It is transferred onto ocean-going tankers and shipped to West Coast refineries and Asian markets.
- Walk south on NW Front Ave., pass the parking lot, and turn right onto Kittridge Overpass.
- KITTRIDGE OVERPASS**  
You may see black tank cars parked below, alongside Zenith. These are "unit trains" 90-100 cars long. Placard 1267 designates crude oil. Those with white "Inhalation Hazard" placards designate toxic volatile compounds including tar sands crude oil. In 2021, Zenith transported more than 300 million gallons of oil through this train yard.
- Return to car, continue north on NW Front Ave.
- PHILLIPS 66, CHEVRON & KINDER MORGAN**  
These tanks store fuel that will be trucked to Oregon gas stations.
- CHEVRON & MCCALL DOCKS**  
Zenith's oil is loaded onto tankers here. Ocean-going tankers travel down the Willamette and Columbia Rivers to the Pacific Ocean.
- CHEVRON'S WILLBRIDGE BULK FUEL STORAGE AND DISTRIBUTION TERMINAL**  
Site of groundwater contamination
- METRO CENTRAL TRANSFER STATION**  
"The Dump" is for garbage, recycling and hazardous waste disposal.
- BURLINGTON NORTHERN SANTA FE (BNSF) RAILROAD BRIDGE**  
The bridge carries fuel trains across the Willamette to the trainyard behind Zenith.

Drive up NW Front Ave. to Siltronic Corporation, where you can turn around and return to Kittridge Overpass. Notice the open acres of land previously contaminated by industry, referred to as brownfields.



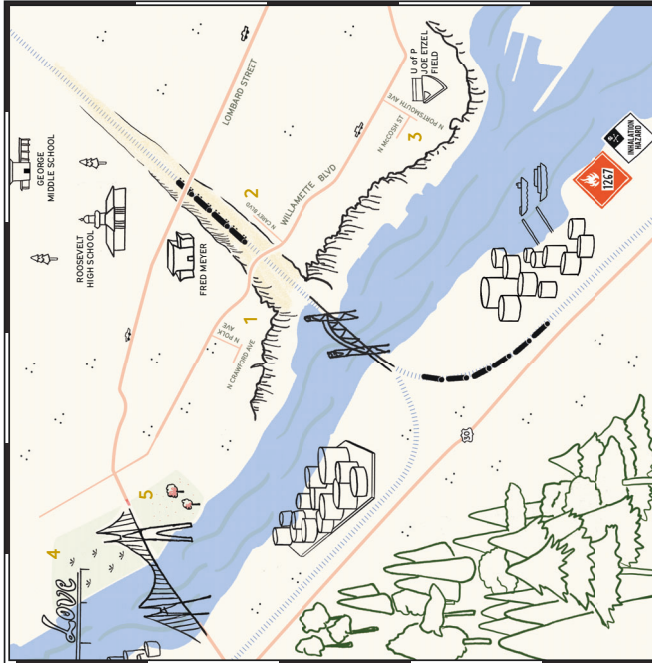
Linnton was once home to many lumber mills, mostly employing immigrants, who lived along the railroad tracks. In 1911, Portland banned large hazardous oil tanks within city limits and relocated them to the town of Linnton, outside of Portland city limits. At that time, most of the original communities were displaced. Linnton and St. Johns were annexed by Portland in 1915 and housed sewage treatment and garbage disposal sites, along with fossil fuel transport and storage.

### TOUR 2 Linnton and CEI Hub

A Walking Tour

From Route 30, turn on NW 107th, heading toward the river, pass Linnton Community Center, and cross the railroad tracks. Park. Note the earthen mound on your right.

- LINNTON MILL RESTORATION PROJECT**  
As part of a Superfund restoration and mitigation project, the original mill was removed and most of the soil from grading the river's edge has been mounded onsite; low level hazardous substances remain in the soil. The for-profit Linnton Mill Restoration Project restored 27 acres of industrial area. The area is designated as exclusive habitat for fish and wildlife and so is not accessible to people.
- Walk north on NW Front Ave (unpaved road).
- INDUSTRIAL DISPLACEMENT**  
In the 1960s, most of Linnton's downtown was demolished and much of the area between St. Helens Road and the Willamette River was zoned Heavy Industrial. Many of the remaining family homes that lined NW Front Avenue were removed. Non-river-dependent businesses own much of the land bordering the river now, preventing public access to the water, and creating industrial noise and pollution. Linnton residents are working with businesses and officials to provide river access for the public.
- AIR POLLUTION**  
Odors have concerned Linnton residents for years. Airborne diesel particulate comes primarily from unattended highway trucks. Linnton has asked DEC to require tank farms to more accurately report their air emissions; they currently use an estimating formula developed by the oil industry.
- KINDER MORGAN**  
1400 NW St. Helens Road, where NW Front ends at NW 112th Ave  
This is one of more than 140 petrochemical terminals. Kinder Morgan owns 84,000 miles of pipeline nationwide.
- OLYMPIC PIPELINE**  
Notice the safety warnings.  
The underground pipeline is currently owned by BP Pipelines and AcLight Capital. It runs underground three and one-half feet below St. Helens Road, just beneath the embankment near the Portland Fault Line. The 400-ton Interstate Pipeline System connects Washington refineries to Oregon and can deliver 325,000 barrels of gasoline, diesel, and jet fuel a day.
- NUSTAR TANKS**  
NUSTAR tanks are visible on the map.



### TOUR 3 Willamette River East Side (North Portland)

A Driving and Walking Tour

Start near the intersection of N. Polk Ave and N. Crawford Street.

- WILLAMETTE COVE NATURAL AREA DOG PARK**  
Below is the Willamette Cove, a Superfund site so toxic that people are banned from visiting. The train bridge carries fuel across the Willamette. Across the river to the left is the Chevron dock where Zenith oil is transferred onto tankers. To the right is NW Natural's Liquid Natural Gas (LNG) tank with the equivalent of 64 million gallons of fuel; LNG is highly combustible and potentially explosive. Farther on the right are NuStar's fossil fuel storage tanks.
- Drive to N. Carey Blvd., where it intersects with N. Willamette Blvd.
- "THE CUT"**  
In the early 1900s this wide canyon was carved into the hillside, for train tracks. Trains going to Zenith and the CEI Hub travel through The Cut.
- Walk over the Cut on N. Willamette Blvd. to drive to the campus of University of Portland, at N. Portsmouth Ave. and N. McCosh St., near by Joe Etzel Field.
- UNIVERSITY OF PORTLAND**  
N McCosh Street & N Portsmouth Avenue  
Below the Bluff is U of P's new Franz River campus being built on rehabilitated brownfields (previously toxic land). Directly across the river is the CEI Hub.
- Drive north on N. Willamette Blvd. to a parking lot at the end of N. Baltimore Ave.
- GREEN ANCHORS PDX**  
Walk to the 7-acre eco-industrial park, just north of the parking lot. In WWII this was a shipyard. Now it's the home of environmentally-friendly small businesses and artist studios. On the pier you'll see the LOVE sign, and the NuStar tanks just across the river.
- CATHEDRAL PARK**  
Cathedral Park is on the south side of the parking lot, beneath the St. John's Bridge. This is a beautiful place for gatherings, festivals, and fishing. Notice the public health fish advisories.

**From:** [Landoe, Brian](#)  
**To:** [Council Clerk – Testimony](#)  
**Cc:** [Jacob, Andria](#)  
**Subject:** UFC Statement on the Climate Emergency Workplan (#708)  
**Date:** Friday, August 19, 2022 7:27:20 AM  
**Attachments:** [UFC Statement on Climate Action Workplan.pdf](#)

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Please accept the attached comment from the City's Urban Forestry Commission.

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

Analyst III | Urban Forestry

503-504-0836 (cell)

Monday – Friday, 7:00 am – 3:30 pm

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August 18, 2022

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

Dear Mayor Wheeler and Portland City Commissioners:

Thank you for the opportunity to comment on the draft Climate Emergency Resolution and Work Plan 2022-2025. The Urban Forestry Commission (UFC) agrees that the City must move swiftly and boldly to curb carbon emissions, improve Portland's resilience to climate change impacts, and address disparities in how those impacts are experienced. We support the general direction of the Resolution and actions in the Work Plan. Yet, we have significant concerns and do not believe that this package is ready for adoption as the City's Climate Action Plan. The UFC believes it is our responsibility to recommend sound, science-based, best practices to ensure that tree preservation, planting, preservation and maintenance, and related, critical actions such as reducing impervious area, are an integral part of the City's Climate Emergency Work Plan. We appreciate the City Council's full consideration of our comments.

**General Comments:**

- 1. The Work Plan lacks the specificity in terms of metrics, resource requirements and gaps, timelines, and a tracking/reporting process needed for it to serve as the City's Climate Action Plan. More is needed to provide accountability, specifically to confirm who will oversee this work and be responsible for ensuring it happens, and how progress will be reported to the public.**

Given that this work plan has a three-year timeline, we are concerned about the general lack of specificity associated with the proposed actions. For example, the resource gaps for many proposed actions are shown as "TBD," even for actions that are to begin this fiscal year (22-23) or next fiscal year (23-24), such as the Urban Forest Management Plan and Title 11 updates. Without knowing the necessary resource requirements and gaps, or if/how those gaps will be addressed, we are not confident that the City is ready to budget for these actions and make them happen.

Further, a number of actions (that are not "Ongoing") have start dates but no end dates, or the end dates are not clear. And when an action timeline is shown as "TBD," are readers to assume the action will start within 3 years (or not)?

**Urban Forestry Commission**

1900 SW 4th Avenue, Suite 5000  
Portland, Oregon 97201  
503-823-TREE (8733) | Fax 503-823-4493

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



Many of the proposed actions do not include or refer to metrics, milestones, or measures of success. And it is unclear how progress will be tracked, who is responsible to do so, and how and to whom progress will be reported. Will this be done through staff and bureau directors, city commissioners or the mayor? Will this citywide effort require additional staff to coordinate, track, and/or report on its progress? How will the public be kept informed about the progress?

**To ensure that it is feasible to conduct this work plan successfully within the 3-year timeframe, and to provide transparency and accountability, the work plan should be revised to provide more specific metrics/milestones, timelines, resource requirements, and a coordinated, transparent process for tracking and reporting progress to the City Council, city commissions, key stakeholders, and the community at large. The work plan should also list strategies for addressing resource gaps, including coordination with other agencies (county, Metro, state agencies) and potential funding sources from within and outside the city.**

- 2. Climate Emergency Resolution and Work Plan package does not recognize or incorporate guidance from Portland/Multnomah County Climate Change Preparation Strategy” (2014) with its strong direction for climate adaptation and resilience.**

The draft Climate Emergency Resolution states that the draft Work Plan is intended to update and replace the City’s existing Climate Action Plan (2015), and that the intent is to address climate mitigation and climate resilience. Notably however, neither the Resolution nor the Work Plan refers to Portland’s “Climate Change Adaptation Strategy” and associated “Risks and Vulnerabilities Assessment,” which were adopted by the City and Multnomah County in 2014. These documents reflect extensive effort on the parts of City bureaus, the county, and the community. The “Risks and Vulnerabilities Assessment” provides a wealth of information about climate-related risks to human, ecological, and infrastructure health and function, and illuminates the disproportionate impacts of those risks among Portlanders. The “Climate Preparation Strategy” establishes a rich suite of objectives and actions to improve Portland’s resilience and adaptation to climate change, and to address disparities relating to the impacts of climate change. The direction provided in the Climate Change Preparation Strategy overlaps with the draft Work Plan. However, on some topics the Climate Change Preparation Strategy is broader and deeper than the resilience-related actions in the draft Work Plan. For example, the strategy calls for actions to reduce impervious area that are not reflected in the work plan. This direction remains critical and must not be lost.

**The draft Resolution and Work Plan should be updated to recognize the Climate Change Preparation Strategy, and either incorporate guidance from this document or establish the clear intent to utilize guidance from these documents in implementing the Work Plan.**

**Work Plan Specific comments:**

### **3. Carbon Sequestration**

Page 3 – For carbon sequestration the work plan calls for **“planting nearly 100,000 acres by 2050”**. **Please clarify what is intended here.** This goal is vague. Where does this number come from and what is the intended carbon capture? One must assume that much of the planting would be outside the city since Portland is about 92,800 acres in size. Please indicate where/how goal will be met, and who is responsible for the planting and long-term stewardship of planted areas.

In addition, the 2015 Climate Action Plan - Urban Forest, Natural Resources, and Carbon Sequestration Objective includes a 2030 goal to reduce impervious surfaces by 600 acres. The City must re-state a clear intent to reduce impervious surfaces in the Climate Emergency Work Plan, consistent with the existing Climate Action Plan, Climate Change Preparation Strategy, and Comprehensive Plan 2035 policy direction, and to support both existing and expanded City depaving/tree planting programs and projects. This is needed not only to complement tree-related goals and actions for carbon sequestration, but also to address the combination of low canopy and impervious surface that is **the** main driver of urban heat island and associated human and ecological health impacts. **Please revise the Work Plan to include an updated impervious surface reduction goal in this section. Related recommendations are provided in comments on other Work Plan sections below.**

### **4. Land Use (page 9)**

- 1.** We support action LU-1 to increase capacity to establish centers and corridors, and the proposed greening of those corridors. Although these actions are listed under the heading “Decarbonization Priorities,” improving resilience must be addressed here as well. **Under “Why This Matters,” please insert this new sentence after the first sentence: “Centers and Corridors must also be designed to improve resilience including to reduce heat and associated health impacts.”** For example, there is a huge opportunity in the 82<sup>nd</sup> Avenue improvement project



to reduce pavement and increase canopy from large- form trees, but this will require direction, leadership, creativity, collaboration, and investment.

2. We support Action LU-2 – to prevent displacement. **Under “Council Request,” please call for proactive planning and development of tools to prevent gentrification, including real and perceived gentrification impacts associated with neighborhood greening.**

5. **Trees (Canopy) and Natural Resources/Green Infrastructure**

- a) **On pages 12 & 13, please combine the headings "Trees (Canopy)" and "Natural Resources/Green Infrastructure" to create a single heading that reads "Green Infrastructure/Trees (Canopy)/Natural Resources. Consolidate the associated “T” and “NR” actions under this one new heading.**

The Purpose section of Title 11, Trees states: ***“Trees are a fundamental component of the City’s urban infrastructure.” (11.05.010.B).*** However, the heading “Green Infrastructure” is applied to a different section of this Work Plan, specifically the section focusing on natural resources in Portland’s environmentally sensitive areas. Natural resources, trees, and bioswales are all part of Portland’s green infrastructure system. However, the section headings currently imply that trees/canopy are not part of that system. It is important that the Climate Emergency Work Plan reinforce the paradigm of trees as a key component of Portland’s infrastructure.

- b) **Please specify Resource Gaps in T1, T2, and T3.** Each action in this section shows “TBD” under Resource Gaps, which is not acceptable. The Urban Forest Management Plan long overdue update is slated to begin this year and the Title 11 update within two years. The tree planting program is underway and ongoing. This Work Plan must provide meaningful and transparent resource-related information that supports the City and bureau budgeting for these actions.
- c) We support Action T-1 – to update the City’s Urban Forest Management Plan. However, this action wording lacks the direction provided in other proposed actions. **Under Action, please add the underlined language: “Update and implement the Urban Forest Management Plan and tree canopy targets, to address climate change, potential canopy changes due to development and**

**other impacts, equity, public health, infrastructure asset management, and the need to preserve large-form trees and space for large-form trees.**

- d) We support Action T-2 – to update Title 11, however the intent stated is too narrow. **Under Action, please add the following underlined language: “... to improve preservation of trees and space for trees (especially large-form trees), provide more equitable distribution of tree canopy, and achieve canopy goals. Please remove “increase resources for tree planting in high priority communities” from this action, as this does not relate to Title 11, and integrate it with Action T-3.**
- e) We support Action T-3 to expand tree planting in East Portland and other priority neighborhoods. **Please provide or refer to metrics or measures of success, and to guiding plans such as “Growing a More Equitable Urban Forest.”**
- f) For the T1, T2, and T3 “Why This Matters”, please update the third sentence to read: Trees improve air quality by actively removing particulate matter and other pollutants, provide for safer streets by reducing vehicle speeds, reduce urban flooding through stormwater capture, improve habitat connectivity for wildlife by connecting urban greenspaces, and lower summer temperatures through shade and evapotranspiration.
- g) **Please add a new action directing Portland Parks and Recreation to “Evaluate and recommend street tree maintenance program and funding options to improve tree canopy and community resilience, and to reduce the disproportionate financial burden and tree canopy-related disparities (e.g., urban heat island) experienced by Portlanders, many of whom are low-income, and/or who are Black, indigenous, and other people of color. Bureaus would include at least PPR, PBOT, BES. Council request would be consideration of options and direction for action.**

Historically, the City of Portland has assigned responsibility for street tree maintenance with adjacent property owners. As a result, street trees are less healthy and resilient, and Portlanders often choose not to plant street trees due to the financial burden. This exacerbates the disproportionate impacts of climate change on people with low incomes, and/or who are Black, indigenous, or other persons of color, many of whom live in tree-deficient neighborhoods.

In 2017, the Urban Forestry Commission and City staff presented the City Council with a proposal to explore potential City street tree maintenance program options. After hearing the presentation and strong public testimony in support, the City Council, directed the establishment of a task force to examine street tree maintenance program and funding options, and to make recommendations. This effort has since been subsumed by Portland Parks and Recreation's Sustainable Futures project, where it is unlikely to receive the attention warranted. **In this Climate Emergency Work Plan, it is critical that the City establish an intent to manage street trees as a fundamental infrastructure asset, and address the barriers and inequities associated with the lack of street tree maintenance.**

- h) We support Action NR-1, to complete the E-zone correction process in Industrial Areas including the Columbia Corridor. The existing maps are outdated, and the new maps will more accurately apply to existing tree canopy.
- i) We support NR-2, to continue support for community-based organizations doing watershed stewardship, community engagement, and education. **Please add "tree planting" to the list of functions attributed to these organizations. Also, please clarify what is meant by "continue to support".** Does this mean at current, previous, or expanded levels? This is confusing given that some city contracts, such as those for tree planting, are currently in flux. Further, this is the only action in the Work Plan that has "None" under Resource Gaps. It is unclear what "None" means. **If the action is to continue supporting organizations the city has supported in the past, and the action is ongoing, the action should be shown either as funded during the work plan timeframe, or should identify any additional funds needed, or as TBD.**
- j) We support Action NR-3 – to include climate resilience in the EOA. This action is scheduled to start this fiscal year (22-23). A Resource Gaps assessment of "TBD" is not acceptable. **Please update Resource Gaps to provide meaningful information.**

Also, the NR-3 language "to allow space for trees" is weak and does not reflect previous City Council direction. Ordinance 190200 As Amended (Nov 2020) states: "The Bureau of Planning and Sustainability will evaluate the Title 11 tree preservation and density exemptions for IH as part of the Economic Opportunities Analysis (EOA) update, consistent with City goals including those related to tree canopy, environmental health, climate change, and urban heat islands. The EOA

shall also analyze equitable public health and environmental justice, especially for those who are essential workers, those who are Black, Indigenous, and People of Color, and community members working in or living adjacent to the IH zone. The Bureau of Planning and Sustainability, Bureau of Development Services, and Portland Parks & Recreation shall also bring to Council viable strategies to reduce the urban heat island effect and create and maintain a healthy urban tree canopy within the IH zone concurrent with completion of the updated EOA.”

**Please reword the NR-3 Action by deleting “allowing space for trees” and rewording with the underlined: “... This includes address equitable public health and environmental justice, bring viable strategies to reduce urban heat island effect, create and maintain and healthy urban tree canopy within the IH zone, and protect wetlands, riparian corridors, and other natural areas.”**

- k) We support Action NR-4 – to create a comprehensive green infrastructure systems plan. Under Action - **Please elaborate on this action, providing intent and a citation for the work completed in 2019-2020 referred to in this section.**
  
- 6. **Wildfire** (page 14) - We support ambitious and expeditious action to address wildfire risks, for people and wildlife, and to sustain a healthy urban forest. **Please consider including a City-sponsored, proactive tree-pruning program at the Wildland Urban Interface near City natural areas (such as Forest Park) to reduce risks to nearby residents and to the natural areas.**
  
- 7. **Health Impacts – Heat and Smoke** – We support the actions in this section; however, it is missing key actions needed to reduce the heat-related impacts of climate change – specifically to reduce existing and future impervious surfaces and improve shade-equity. In our climate crisis, where excessive heat is already causing serious health impacts and deaths, this omission from the Climate Emergency Work Plan is not acceptable.

As noted above, the Climate Action Plan called for reducing impervious area. The 2014 Climate Change Preparation Strategy addressed impervious area specifically in ***Objective 1 Decrease the urban heat island effect, especially in areas with populations most vulnerable to heat.*** This objective is followed by 12 actions including the following:

- *Decrease impervious areas and increase the total ecoroof acreage in the city and identify additional complementary heat-mitigation alternatives such as reflective roofs in public and private development.*
- *Implement and expand the City's Urban Forestry Management Plan, revegetation, restoration and land acquisition programs, and continue and expand programs that incent removal of impervious areas.*
- *Adopt a site development performance standard to achieve high quality green infrastructure similar to Seattle's Green Factor for new development and redevelopment sites.*
- *Update environmental codes, regulations, plans, zoning and permit reviews to support strategies that reduce the urban heat island effect.*
- *Research, evaluate and pilot porous paving, de-paving, vegetation and/or more reflective surfaces in parking areas to reduce and cool impervious surfaces, particularly in urban heat island areas with populations most vulnerable to heat.*

Comprehensive Plan 2035 (2016) policy also calls for reducing impervious area and tree canopy to reduce urban heat island effects:

**Policy 4.76 Impervious surfaces.** Limit use of and strive to reduce impervious surfaces and associated impacts on hydrologic function, air and water quality, habitat connectivity, tree canopy, and urban heat island effects.

Although Portland's zoning code regulates building coverage, it does not (unlike some other U.S. cities and counties) regulate impervious surface coverage which can include patios and balconies, driveways, pathways, parking areas, etc. Combined with planned higher density development and recent housing-related code changes, Portland will continue seeing significant increases in impervious surfaces, including in our hottest neighborhoods, unless action is taken.

The Climate Emergency Workplan should include or incorporate by reference guidance from the Climate Change Preparation Strategy and the Comprehensive Plan to reduce impervious area and increase tree canopy to reduce urban heat and associated health impacts. The Bureau of Environmental Services is already collaborating with community partners to remove impervious areas and plant trees and vegetation. These programs should be expanded, and the City should create a multi-faceted and ambitious plan to

reduce heat across the city, including reducing existing and future impervious surface, strategic tree preservation and planting, and use of appropriate materials for roofing and paved surfaces.

- a) **Please add an action(s) to this section calling for 1) expansion of existing programs focused on depaving and tree planting in heat-prone areas, 2) a plan to reduce urban heat across the city, and especially in areas that are most vulnerable to heat. The plan should establish geographically specific temperature reduction targets, and regulatory and non-regulatory strategies to meet them, including programs to reduce existing impervious surfaces (depaving) and reduce future impervious surfaces associated with development, preserving, planting, and maintaining space for trees, development design approaches and materials (e.g., lighter colored roofs and streets), and 3) evaluation of regulatory options to limit impervious areas and such approaches in other cities.**
  - b) **Please add an action establishing the approach that PBOT will use to track the effectiveness of the recently adopted Pedestrian Guidelines in achieving its stated intent to encourage planting of street trees, especially large-form trees.**
8. **Infrastructure Planning and Construction (page 17) This section is currently lacking in that it does not, but should, establish a clear intent to leverage City infrastructure investments to improve community resilience.**
- a) We support Action IP-1 – To incorporate climate change information into capital project planning and design. However, simply incorporating such information into planning and design is insufficient. We want our infrastructure facilities to be resilient to climate change. But we also want to incorporate design approaches during infrastructure planning that will improve community resilience, equity, and environmental justice.

**Under Action, please reword as follows: “Incorporate climate change information (i.e., flood risk, extreme heat, drought) and opportunities to improve community resilience, equity, public and ecological health, and environmental justice, into capital planning and infrastructure design. Also, please update the “Why This Matters” section accordingly and complete the Council request section.**

- b) **Please add a new action to: Complete the Streets 2035 planning project, with a priority to include measures that improve community health and resilience to climate change, such as the inclusion of large form street trees and shade equity.**

We submit these comments to support Portland's efforts to make real progress toward meeting climate mitigation goals and creating an equitable climate-resilient city.

Sincerely,

A handwritten signature in black ink, appearing to read "Vivek Shandas". The signature is fluid and cursive, with a large initial "V" and a distinct "S" at the end.

Vivek Shandas, PhD  
Chair, Urban Forestry Commission

cc: Urban Forestry Commission members  
Andria Jacob, Bureau of Planning and Sustainability

**From:** [Mary Hill](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Written testimony for August 24 meeting re BPS proposal re City of Portland climate emergency  
**Date:** Friday, August 19, 2022 4:15:28 PM  
**Attachments:** [TFLO+comments+to+CC+on+Climate+Emergency+Workplan+August+2022+\(1\) \(1\).pdf](#)

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Please send me notification, via email, that this testimony was received. Thanks!

I have attached specific proposals from Trees for Life.

In addition to this attached document, which I support, I am adding this personal testimony:

1) Please issue an Emergency Moratorium on removal of ANY tree, private or public, larger than 24 inches in diameter.

The City of Portland Tree Code is VERY outdated.

When, I keep asking myself, will the City of Portland consider the known health benefits of large trees on air quality, deadly heat, and unhealthy air?

2) Please consider the published data by Vivek Shandas re the heat dome east of I-205 and loss of urban canopy in that area of the City of Portland.

3) Please reach out to the governing body of Multnomah County to make advisory "no burn" days mandatory (I consult their emails before I do any non essential burning)

4) Please reach out to Metro regarding this emergency

All of the incorporated and unincorporated areas of Multnomah, Washington and Clackamas County need to work together. We all live in the same geographic area.

I have lived in the City of Portland since 1985.

The changes in air quality are visible and unhealthy for many months of the year now.

Deadly heat has become much more common.

Extreme weather is also more common.

Let's all work together and use the living resources that are existing (trees), rather than waiting.

I know it's quite possible to build and protect a large tree. I did that when I built an ADU in my own backyard.

The large trees of Portland are a irreplaceable resource.

Sincerely,  
Mary Hill  
3411 SW Luradel St  
Portland, OR 98219







Comments on Portland’s Climate Emergency Work Plan, July 2022, Exhibit A

August 8, 2022

Dear City Council:

We appreciate all the work that City staff have done on Portland’s Climate Emergency Work Plan. As the Plan states, “the time is now” to take action to address how to mitigate heat impacts on our city.

We agree that cutting carbon emissions by improving mass transit and pedestrian ease is important. But if such improvements exist in a sea of concrete and asphalt, they will not provide cooling, storm-water mitigation, and filtering of air pollutant and noise. These environmental services are crucial for climate resilience and human health. They are best ensured by large-form trees and green spaces.

Large-form trees, which grow more than 50 feet tall and live for more than 75 years if given the space and conditions to do so, provide significant human health and environmental benefits that dwarf those of small-form trees. Space for large-form trees in our rights-of-way near where people live—not only in our parks or distant natural areas—should be given equal priority with other climate measures such as solar panels, paint for streets, roof membranes, and heat pumps. Large-form trees take time to reach their full environmental services potential, including carbon storage. That’s why the time to make room for them across the city is *now*.

As a whole, the Climate Emergency Work Plan appears more aspirational than an actual blueprint for managing projects throughout the city in a new way that addresses the extreme urgency of the climate crisis. We don’t need another call for climate action, we need specifics. Moreover, the plan does not address the way the City bureaucracy itself is deeply entrenched in only enforcing minimum code requirements rather than looking for ways to maximize opportunities that go beyond such minimums. Emergencies demand solutions that go beyond the status quo.

Nor does the plan articulate new, creative ideas for how the City will meet its climate goals. For instance, nowhere in this plan does the City model specific ideas for how our buildings, sidewalks, streets, and parks might be redesigned to still be livable in the extreme climate conditions we are beginning to experience. Pilot

projects provide a way for the City to model best practices and evaluate what works and what doesn't but no pilots are mentioned in the plan. The Work Plan must name at the very least a handful of sites or areas where new designs will be tried and evaluated within the next few years for their impact on human health and living conditions.

Change comes from on-the-ground redesign, not from broad directives. The City must design space for large-form trees within 100 feet of housing, workplaces, and institutions, starting with the rights-of-way. Importantly, to increase space for large-form trees, the Work Plan must reduce impervious area. The Title 33 zoning code does not regulate impervious surface coverage. Unless action is taken to do so, our hottest, most vulnerable neighborhoods in East Portland, slated for high-density development, will be cursed with increased impervious surfaces just at the time they need *more* green, not less.

In order for any real change to take root in how the City does things, the Work Plan should include an inter-bureau design and implementation checklist to be used for every new individual project. Every checklist must include how the project's design will enhance or detract from the urban forest, which is essential to our climate resilience. Proposed projects should be evaluated on how far beyond merely fulfilling minimal code requirements they go. Serious, effective emergency planning and action require that smarter, innovative design to accommodate space for large-form trees (or at least medium-form trees) be applied from the very start to all new development and capital improvement projects.

No less than an on-the-ground design revolution is required to meet our climate emergency. The Work Plan should stipulate pilot projects that result in large-form trees in the ground with guaranteed City maintenance in low-canopy areas. The plan should state specific ways to achieve this end along transportation corridors. For instance:

- PBOT and Urban Forestry together should look for one-way streets perpendicular to transportation corridors to serve as pilots for more climate-adapted design. Such streets would still have a bike lane and on-street parking, but one lane could be used to make room for 8-foot or wider treeways on the non-powerline side of the street. These wider planting strips would allow planting of large-form trees big enough to shade the entire street.
- On streets where planting strips are less than 6 feet wide, PP&R should purchase, on the side of the street without powerlines, 2 feet of frontage across the front of

the adjoining lot(s) to enable the planting of large-form trees. These wider strips will reduce sidewalk conflicts and costly repairs. The larger trees that can be planted also will be able to shade and cool the street and surrounding buildings far better than small-form trees can.

- PP&R should pilot the purchase of treed lots in low-canopy neighborhoods near transportation corridors for the purpose of creating pocket parks that function as large-form tree canopy reservoirs that clean and cool air.
- BES should lead in piloting creation of island canopy reservoirs in institutional parking lots where stands of at least three trees are possible. Any City-owned parking lot should be first in line for such a pilot. BES should maintain the trees if the island is a stormwater facility, and PP&R if the trees are planted at curb level.
- PBOT, BES, and PP&R/UF should cooperate in installing shaded electric car charging stations to make the connection between carbon reduction and trees.
- Affordable housing should be required to have one or more large-form trees to benefit residents. This would be supported by an easement system.

### *Specific Language and Other Changes*

In addition to creating a much bolder and more specific emergency work plan, we would like to see the following changes in the text:

—Combine the “Trees T” items now on p.13 with Natural Resources/Green Infrastructure (NR) items to reinforce that trees are infrastructure on an equal par with other infrastructure when designing roads, sidewalks, and buildings. All City bureaus must be required to treat trees this way *or little will change*.

—T-1 (p.13) Change Action text to this: “Expedite updating and implementing the Urban Forestry Management Plan and ensure that it is informed by the science showing the public health benefits of living and working near large-form trees.”

—T-2 Change Action text to this: “Update Title 11 regulations to improve tree preservation and require that all new development and capital improvement projects are designed to include adequate space to hold large-form trees.”

—T-3 Change Action text to this: “Accelerate tree planting in East Portland and other priority neighborhoods through existing and additional funding, and ensure these efforts include partnering with community organizations with the capacity to

plant trees. In these tree-planting target areas mandate greater space for large-form trees in the right-of-way.”

—Add a T-4 whose Action reads: “Expedite City funding to maintain street trees across the city. Maintaining essential public infrastructure like street trees should not be left to property owners, many of whom are unable to afford such maintenance, a factor that contributes to canopy deterioration and wasteful tree-planting efforts.”

—Add a T-5 whose Action reads: “Using creative design, preserve more public space in the right-of-way for large-form trees in new projects such as the transformation of 82<sup>nd</sup> Avenue from a state highway to a City-owned corridor.”

—Land Use-1 [add to end of Action text]: “All such plans must require heat reduction approaches that include preservation of large-form trees and space to plant new ones. This is especially essential in plans to improve major East Portland corridors such as 82<sup>nd</sup> Avenue and other important north-south corridors.”

—IP-1 Change Action text to this: “Incorporate information about rapidly changing weather patterns resulting in flood risk, canopy loss, and heat islands. These changes compromise environmental and human health and their effects must now be taken into account in all capital planning and infrastructure design by incorporating tree canopy.” Under the Why This Matters column, add to the last sentence the italicized words here: “This includes evaluating the social cost of carbon ... and repair for assets *such as trees killed or damaged* by climate stressors.”

—H-1 (p. 16) Add the italicized words here to the last sentence under Action: “... such as landscaping *including large-form trees, which at maturity grow tall enough to shade buildings*; construction type, and resident practices.”

In closing, the Climate Emergency Work Plan reflects some of the broad knowledge we already have amassed but it will not bring about the kind of bold changes this emergency requires. These changes must occur on the ground, and therefore must be imbedded across City codes, which climate crisis has rendered out-of-date. But we won’t move the dial here unless and until codes are rewritten and practices revamped to reflect the crisis we’re facing.

Sincerely,

Kyna Rubin on behalf of [Trees for Life Oregon](#)

**From:** [Pat Kaczmarek](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Climate Emergency Work Plan Comments  
**Date:** Monday, August 22, 2022 8:57:13 AM

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To: Portland City Council

I am a long time Portland resident. I have thoroughly reviewed the Climate Emergency Work Plan. Thank you for funding this important work through the Bureau of Planning and Sustainability.

While the plan is wide ranging in it's recommendations, I believe it is the Council who need to provide public education and a strong call to action. The public deserves to know the severity and accelerating pace of climate change.

Please issue an emergency call for energy conservation. Any homeowner with the means should immediately make renovations to their residence to reduce the use of natural gas and improve energy efficiency through improved insulation and window replacements.

An emergency fund is needed to provide subsidies for low income residents to make these renovations. These funds will be available through the Federal Inflation Reduction Act.

So much of the plan rests on the Bureau of Planning & Sustainability - the Council must give them the staffing and resources needed for an emergency of this magnitude.

In addition, Portland City Council should establish an empowered Climate Emergency Commission to work with the best available experts as well as committed and concerned stakeholders on effective action steps, measurable outcomes, timelines, and responsible staff for various sectors in order to reduce the city's greenhouse gas emissions in line with climate science.

How do we pay for it? We have been resisting taxes for so many years, I think we have lost sight of how a democracy operates. We need new taxes now - on rich corporations and individuals, but also regular citizens stepping up to support the expansive changes that are needed for real change to happen NOW!

The City is spending only .06% of their budget on climate-related policies. About a third of that tiny percentage is related to emissions reductions —

An emergency of this scale will require a war time like mobilization of resources. We are in a Climate Emergency - Let's act like it.

Thank you,

Pat Kaczmarek  
4709 SW 31st Drive  
Portland, Oregon 97239  
(503) 975-7742

**From:** [Peter Slansky](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Climate change  
**Date:** Monday, August 22, 2022 9:02:56 AM

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We must accelerate our efforts to curb our carbon emissions, move to electric car fleets, insulate homes, convert to solar and heat pumps, etc. to stop the march towards an uninhabitable Portland and earth. Let's take action now before it is too late!

Peter Slansky  
Portland, Oregon

**From:** [Tri Sanger](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Testimony on climate work plan  
**Date:** Monday, August 22, 2022 9:25:06 AM

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After reviewing the city's climate work plan, rather than feeling relieved, I'm honestly quite appalled.

We can do more, and we **MUST** do more in order to have a livable future for ourselves, our young people, and the millions of nonhuman residents of our community.

First, planting trees is a great way to combat heat islands and shade inequity. But planting trees will do nothing unless we maintain them, which is not mentioned in the work plan. And we can plant many more trees, as communities and Friends of Trees does every year. And while we're at it, why not make sure trees are native to support native pollinators, or plant fruit and nut trees to provide food for an unsure future.

Second, we must stop the I-5 freeway expansion. As a world, we need to be transitioning away from polluting vehicles, and towards public transportation.

I ask, that we have **CONCRETE** numbers on reductions and set ambitious targets in all spheres: business, transportation, everything. Vague targets will lead us to our doom.

Thank you,  
Tri Sanger



**From:** [Glenna Hayes](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** It's is NOW or Never  
**Date:** Monday, August 22, 2022 10:25:04 AM

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The climate emergency is already here, and time is running out to act. We see and feel it in Portland in the form of record-shattering heat, choking smoke from increasing wildfires, more frequent floods, and other extreme weather that is changing our lives and the city we share. Nearly every Portlander can tell you where they were in June 2021, when temperatures hit 116 degrees and killed 72 people in Multnomah County. Or in September 2020, when smoke from wildfires poured into the city.

City Council, you can either step forward and continue on the path of National climate leader that Portland has forged, or you can let our house burn down.

NOW is the time to be a climate champion. The children are counting on you.

Glenna Hayes  
7254 SW 53rd Av  
Portland, OR. 97219

[Sent from Yahoo for iPhone](#)

**From:** [Amanda Ligon](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Climate Emergency Work Plan  
**Date:** Monday, August 22, 2022 10:36:59 AM

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Good morning!

My name is Amanda Ligon. I have been a Portland resident for almost 2 years now and an Oregonian for 22. Over these years, I have seen Oregon summers change from pleasant to deadly, fires rip through our favorite places, my loved ones unable to leave their homes from the smoke. The Climate Emergency Work Plan being proposed will do nothing to save them, and thus I am begging you to think critically about our next steps. We must change this plan to include a significant increase in concrete action.

If we continue to spend .06% of our budget on climate-related policies, we are telling our children we don't give a single shit about their future. I'm a therapist, and I work with mostly young people. Suicidality and depression rates continue to climb, and more and more of our young people are expressing hopelessness about climate change as part of why.

You have the power to stop this. It's not too late and I believe in y'all. You took these jobs because you wanted to make change for Portlanders, and here's your chance. We need to be nourishing public transportation and stop expanding freeways from destroying our neighborhoods. Y'all could be implementing internal air quality and temperature standards, as well as requirements to reduce emissions. We need to plant all the trees we can and dedicate funds to their maintenance. We need a Climate Emergency Commission to determine and implement concrete steps towards reducing greenhouse gas emissions.

Even if you took this job for other reasons, YOU are at risk of dying of climate change. Not in the future, not 10 years from now, but today. Not those people over there, across the globe, but right here in Portland. If you've been in Oregon even half the time I have you've already seen terrible changes. Don't let our beautiful state, it's wonderful people, this incredible planet and yourself down. Act today and strengthen this work plan!

Warmly,  
Amanda

**From:** [Jeff Kleen](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Climate Emergency Workplan comments  
**Date:** Monday, August 22, 2022 3:05:18 PM

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Dear City Council,

As a Portlander who is extremely concerned about Climate Justice, I look to leaders like Extinction Rebellion for solid analysis and bold ideas that meet the severity of the climate crisis we face. It is in that spirit that I offer ER's analysis and recommendations for improving the City's Climate Emergency Workplan. I hope that you will take the recommendations to heart and take swift action to address the climate crisis in clear and concrete ways.

From ER:

In the two critical years since the passing of the Climate Emergency Declaration, the City can point to few, if any, concrete policies that will result in a substantive decline in emissions, which according to the IPCC needs to begin by 2025 and be halved by 2030. This is unacceptable. We need and demand specific action steps and measurable results.

What is labeled a “workplan” is a vaguely aspirational document, short on specifics. The CED first-year 2021 report was basically that as well; neither has resulted in concrete policies to reduce emissions. **The City Council must create a Climate Emergency Commission** with the best available experts and stakeholders to work with them on concrete action steps, measurable outcomes, and timelines to reduce the city’s greenhouse gas emissions.

Portland’s recent budget process in a **SURPLUS** year found the City government bragging about a .06% investment in climate related programs. Only a very small percentage of that is slated for emissions reductions or climate mitigation efforts, not very indicative of a full-blown Emergency Response. Many assumptions made in their decarbonization

model need more information, and some of which could be challenged. The Police Bureau, which has its own airplane (why??), and other bureaus are omitted from this workplan, even though they consume a large percentage of general fund resources.

Only in the transportation sector does the workplan suggest anything close to a 50% reduction by 2030. Even there, the specific actions under T-1 and T-4 are very vague. Sixteen percent of their proposed transportation reductions rely on an update of the Renewable Fuel Standards. As research scientist [Richard Plevin](#) and other experts have pointed out, renewables come with their own set of climate issues. If the City is relying on the corporate nonsense that Zenith and other corporations quote on the emissions reductions levels, this is totally not to be trusted. That 16% reduction in the model needs to have assumptions carefully vetted, and the City needs to work with Dr. Plevin and others to set good policies that account for the complexity of renewable fuels. It is good that they plan to implement the Pricing Options for Equitable Mobility ([POEM](#)) recommendation: a 20-cent fee on parking meter transactions to send an initial price signal about the costs of driving. But we wonder about the timeline for various parts of that, which include:

- Expanding affordable housing [Transportation Wallet](#)
- [BIKETOWN for All](#)
- Multimodal [infrastructure projects](#)
- Research and policy development to inform additional pricing, equitable mobility, demand management, and affordability programs

**BIOFUELS:** Part of the City’s climate action work plan relies on “replacing petroleum diesel at the pump.” The council is requesting “update the renewable fuels standards.” While updating the renewable fuels standards great care must be taken to study this first, and be very cautious about relying on renewable fuels or bio-diesel. There are many different types of renewable fuels and biodiesel, which include major issues. Some of these can actually have a greater negative impact on climate. Biofuel is NOT a silver bullet.

Some of the issues:

1. Induced land use change – cutting down forest to plant fuel stocks, or replacing crops grown for food with crops grown for fuel
2. Can have harmful emissions same as fossil fuels
3. Similar explosive hazards, does not belong in an earthquake liquefaction zone
4. Easy way for fossil fuel infrastructure companies to hide fossil fuel activity; Zenith Energy is doing just that
5. Having more bio-fuels to the mix may drop prices so people will just use more of all fuels
6. Fossil fuels used to grow the feedstock crops often have higher climate impacts than the biofuels produced from those crops

We need to transition away from burning stuff to get around, whether fossil fuels or biofuels.

Few concrete emission reduction actions are presented in the Buildings sector and what they actually will do (for example in

B1 and B2) in terms of emissions reductions. We have concerns from our participation in the Build Shift process. See below under B2 there is talk about eliminating carbon in City operations but again no concrete action plans, measurables, or timeline.

The Industry section is incomplete and unacceptable. Behind the scenes the City Council killed off the Portland Clean Air Protection Program. Businesses and industry should not be able to get off the hook for the next 10 years with no expected reductions in emissions. That's ludicrous. The City needs to institute some sort of emissions fees policy asap.

**TREES:** We are disappointed in the vagueness of the sequestration and trees section of this document. Despite calls by the Shade Equity Coalition, there is no mention of street tree planting maintenance. The new Parks tree planting program is committing to less than half of the number of plantings that Friends of Trees has done in the past. Most importantly, there is no commitment to inventory and preserve giant old trees and community shade equity and sequestration resources, even if they are on private property. Waiting two years to begin the tree code revision process is unacceptable unless a moratorium is placed on the cutting of old giants. Look at what Milan, Italy is doing: planting 3 million trees –strategically – by 2030. Can't we do better?

**CONCERNS ON BUILD SHIFT:** We are concerned that discussion was tending to point towards 2026 as the Build Shift implementation target for carbon emissions reductions, since science says there needs to be a significant downturn in emissions no later than 2025 and halved by 2030. Pushing

back timelines will result in serious consequences. A ratcheting-down approach of annual decreases starting now is critical, as benefits from reductions will not be seen quickly. We agree with the concept of incentivizing early action. The City needs to have policies in place that will begin a downward decline as soon as possible through private/public partnerships, as well as encouraging the use of PCEF funds in this critical arena.

**BUILDINGS:** Since there is baseline data on commercial buildings, we would recommend plans to start there in 2023 with commercial buildings of 20K square feet (sf) and above, then phase in 10K sf commercial buildings and 20K sf large multifamily rentals two years later, eventually going to 5-unit buildings before 2030. As soon as possible, put into place Resource Centers for both owners and renters.\*

**TENANT/LANDLORD SOLUTIONS:** While we understand the systems life cycle benefits of a customized, internal-based approach to emissions decline, we are concerned both about the ongoing energy cost burden on tenants (ranging from 18-45% of necessary budget expenditures) as well as not adequately reducing emissions on the schedule required by climate science. Landlords should not be able to continue to defer maintenance or delay as long as possible the big ticket items. Short intervals of 2-3 years requiring 10-15% emissions declines in each interval are recommended.

However, we also recommend allowing flexibility in terms of how building owners are going to achieve these reductions, through a customized approach addressing lighting, building

envelope upgrades, mechanical upgrades, operations upgrades, and the like, benefitting from cost savings that can be utilized for additional upgrades. Compliance fees will ensure that owners remain on task in meeting building performance standards. Likewise, inspections and compliance certification processes need to be developed. Any owner support should have tenant protection agreements both to prevent displacement or owners passing along higher costs.

**METHANE:** The City should work with Multnomah County to develop health standards to prevent “natural gas” (methane) appliances in new construction (as is being done in NY, CA and Eugene) and begin phasing out natural gas from existing homes. Science makes clear that ventilation and even filtration are not sufficient solutions to the health and climate issues posed by methane, particulate matter, and nitrous oxide. Other communities are working to provide small heating and cooling geothermal districts using existing natural gas infrastructure as a possible transition. The City should work with the County on this for indoor air quality as well as emission reductions. Any cooling standards developed must ensure that cooling sources are energy-efficient and not adding substantially to climate impacts. We support heat pumps, safe renewables, passive designs, and conservation methods to ensure that the long-range costs and climate and health consequences for tenants are not adding harm.

**COMMUNITY ENERGY SOLUTIONS:** The City should immediately begin work on Community Controlled Local Capture and Storage Energy programs, and be ready to increase the percentage they commit to in this, especially if the



utilities are not on track. All decarbonization efforts must involve workforce development aspects so that the green transition creates living wage family jobs and clear career paths for advancement, especially for marginalized communities.

**ENERGY:** The City makes a huge point out of the necessity of decreasing energy supply from fossil fuels towards clean renewable sources. The focus is on Portland General Electric which may be around 2/3rds of Portland's households — this is based on comparing service areas, although Pacific Power area of N/NE Portland is denser than areas of the West Hills for example. Pacific Power's parent company PacificCorps presents misleading information on their renewable claims for Portland area, given that PacificCorps' plan for western states is to continue to burn coal for years, then transition primarily to natural gas and nuclear.

PGE plans to continue their Colstrip, MT coal mine units 3 and 4 until 2034. PGE's 2019 Integrated Resource Plan (IRP) states its emissions will still amount to about 4+ million metric tons (MMT) of CO<sub>2</sub> in 2030, 2.5 MMT of CO<sub>2</sub> in 2040, and almost 2 MMT of CO<sub>2</sub> in 2050. More detailed study of utility IRPs will be needed to see how they expect to get to the promised transition. A huge gap falls between what is promised here and whether or not utilities will meet the state's Climate Protection Plan goals (which are not strong enough according to the more recent IPCC reports), especially since the utilities are actively fighting these in court. The City should immediately begin work on Community Controlled Energy programs, and be ready to increase the percentage they

commit to.

**WHAT OTHER PLACES ARE DOING:** The City should look at what other cities and states are actually implementing as they consider their own action plan! Communities in California have created their own energy districts and utilize the profits for the common good—climate and social justice. Kauai, Hawai'i has brought consumer energy costs down by focusing on community solar and reselling residential and offpeak surplus to other utilities or businesses. Portland can and must do better!

Respectfully,

Jeff

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Jeff Kleen

voice/text: (503) 841-7124

1420 SE Center St. , Portland, OR 97202

he/him/his | [Why are pronouns important?](#)

**From:** [Eugenia Parker](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Climate Emergency Workplan  
**Date:** Monday, August 22, 2022 11:56:07 AM

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Please get serious about your Climate Emergency Workplan ! In its current form your plan is too vague and short on details for real climate change mitigation , including meaningful emissions reductions . In a surplus budget surely you can allocate more than .06% on climate related policies . In the transportation sector , the city must resist efforts to expand freeways and focus on electrifying , expanding , and incentivizing the costs of public transportation . The business and industry section of your plan is the least detailed part of the entire document . For the next ten years , this sector has NO expected reductions in emissions . this is unrealistic and unjust , especially since behind the scenes industry pushed to kill the Portland Clean Air Protection Program . In the trees section of the workplan , despite calls by the Shade Equity Coalition , there is no mention of street tree planting maintenance . the new parks tree planting program is committing to less than half the number of plantings that Friends of Trees have done in the past . Portland City Council must create a Climate Emergency Commission to work with experts and citizens to work on effective action steps , measurable outcomes , responsible staff for various sectors , and timelines to reduce greenhouse gas emissions in line with climate science . Thank you , David Medford , Southwest Portland 503-244-6615

**From:** [Emily Polanshek](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Climate Emergency Workplan testimony for 08/24/22  
**Date:** Monday, August 22, 2022 12:11:05 PM

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My name is Emily Polanshek. I'm a mother, grandmother, retired public school bilingual teacher and an active volunteer with both 350PDX and the Metro Action Climate Team (MCAT) sponsored by OLCV. I care deeply about the livability of our planet, societal justice, and respectful care of habitat for all who live now and are yet to be born. This must include all species with which we share this planet, for we are all interdependent.

First, thank you for the opportunity to comment on the draft Climate Emergency Workplan for 2022-2025. I was thrilled to read the cover and first four strong introductory pages as well as the concluding page.

I was also grateful for the reference to the book Drawdown, edited by Paul Hawkin, in reference to food waste reduction (p. 10). In addition, I recommend his more recent book, Regeneration: Ending the climate crisis in one generation. It may not be as convenient a reference manual for policymakers, but promotes essential, holistic views on equity and the web of life of which we are all a part.

Priority pages 5-16 of the Workplan seem to be a good start but to me seem vague, underdeveloped and incomplete.

Will each agency, for example, TriMet, develop specific goals for their area? At Rep. Dacia Grayber's Virtual Town Hall last week, a TriMet rep stated that only electric buses will be purchased from now on when needed, yet this was not mentioned under Transportation. So, I surmise the answer is "Yes."

If the answer is "yes" to the above question, who will monitor and coordinate all the agencies? I realize the vote on our form of city government may change the answer. But also, the creation of a commission for community engagement and accountability could be essential here. I believe this is something Commissioner Rubio referred to on July 20 of this year.

As I read the Workplan, I wondered about items not mentioned.

Perhaps these will be addressed by each relevant agency, but here are some aspects I didn't see mentioned within current Workplan priorities:

### **Buildings:**

- Can we require developers to produce more units of affordable housing to achieve land use and equity goals?
- Will deconstruction be required rather than demolition when buildings need to be replaced?

### **Transportation:**

- Can we require construction vehicle ignitions to be turned off when not in active use, rather than left idling for indefinite periods of time while parked?

### **Industry:**

- Will we phase out single-use plastics, including in packaging?
- Can there be incentives for industry to use concrete produced in less carbon-intensive ways and/or that sequester carbon?

### **Trees:**

- I'd like transparent disclosure of why the city's contract with Friends of Trees' was terminated. We need community involvement and we need more trees planted. We need to increase shade equity as rapidly as possible.

### **Administration:**

I understood from Andria Jacob that it is the job of our non-profit community orgs to educate the community. I believe the City could do more. A billboard campaign? Public meetings? Educational, festive street fairs?

We all know there is no time to lose; every jurisdiction around the globe must do its part. Please keep the urgency of bold climate action front and center while encouraging buy-in from all involved in our City's evolution. It's a climate emergency!

Thank you, Emily Polanshek, Multnomah Village 97219

**From:** [Lilly Hankins](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Testimony on Climate Workplan  
**Date:** Monday, August 22, 2022 12:31:56 PM

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Dear City Council,

I am writing as an East Portland resident and parent of a 6-year old to thank you for the Climate Emergency Workplan, but to ask you to strengthen it. Specifically, I am concerned that there are no detailed expectations for industries to reduce carbon emissions, which is essential if we want to reach our climate goals. I am also concerned that there is no plan to plant and maintain street trees in underserved areas (such as East Portland, where we experience higher temperatures than in closer-in neighborhoods that have better tree canopy). My understanding is that the new tree planting program is committing to less than half the number that Friends of Trees has done in the past. Now is not the time to be cutting back on these efforts, we need to do everything in our power to mitigate climate change and help neighborhoods adapt, and I expect the City to take stronger action to ensure we reach our climate goals.

Thank you,

Lilly Hankins  
97236

**From:** [Milt Markewitz](#)  
**To:** [Council Clerk – Testimony](#)  
**Cc:** [Emily Polanchek](#)  
**Subject:** PDX Climate Change Emergency Plan  
**Date:** Tuesday, August 23, 2022 8:31:53 AM  
**Attachments:** [PDX Emergency Climate Plan.docx](#)  
[ATT00001.txt](#)

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To Whom,

Attached are my comments and I welcome comments and questions by email, phone or ZOOM. As you'll discern when you read my suggestions, I believe it's necessary to listen,, embody and learn from a culture who've long been dealing with the systemic racism we say we are trying to reverse. This change in consciousness seems imperative if we're to address the root cause of Climate Change.

By copy to Emily, thanks for forwarding this request to me, and feel free to share it with the TOC and others if you wish.

Thanks for listening and all you are doing,

Milt Markewitz  
503 248-0432



## PDX Climate Emergency Work-plan Suggestions

Milt Markewitz — 8-18-22

'Climate Emergency' connotes we have a serious problem — one that suggests an immediate, strong response is required, as well as that we will address the problem with the same consciousness that created it. If we truly wish to address the root problem, the solutions we implement must lead us to an appropriate consciousness that deals with more than just a symptom.

My assumption, which may need some serious work before it is broadly accepted, is that the consciousness lived for millennia by flourishing Indigenous Peoples is an appropriate consciousness for us to adopt. It is rooted in a time when Nature was human kinds' sole mentor, survival required that all life was sacred, life was lived according to guiding principles of ecological balance and communal harmony, and life's emergent processes were blended with relational and task oriented ways of being.

I suggest our plan be generational, 20-30 years, with some critical actions taken very soon due to the CODE RED nature of our problems, and that a significant portion of the leadership be Indigenous people who have embodied all that's necessary to be truly sustainable which includes relational leadership, life flourishing processes, Earth ethics and the principles associated with them (*Original Instructions*), emergent design, and blending apparent opposites.

My suggested foci are as follows:

**Tribal Relationships** — This is a most important piece of the plan that begins by asking the local tribes their needs, and offering them the opportunity to develop the framework for moving forth. There will need to be compassion for the pain they've endured, and a request for help so that we might embodying the wisdom that so often transcends the pain. Also, I suggest we look at our Jan 6th Insurrection as an epic moment in US history, and that we look back to the work of our Founding Fathers with the Iroquois to better understand what they were trying to tell us about Council governance and why there couldn't be slavery, imbalance between men and women, or our strange concept of ownership imbedded in our Constitution. Also, we need to better understand what they new about living systems and processes as well as the quantum reality in which we exist. We then will be better able to articulate the constitutional changes we'd like to adopt.

**Local Indigenous Wisdom** — In addition to NAYA and Indigenous Studies, there are a number of very successful Indigenous programs in Portland and the surrounding area. Examples are NARA, the NW Native Health Board, The Confluence Project, CRITFIC, Randy Woodley's Eloheh, Terry Cross's NICWA, to name a few. Their messages and the messengers who share them need to be elevated so that their form of relational governance and leadership can be experienced and adopted.

**Food, water and physical security** — I don't know much about which tribes are doing what, but know its been a priority for some time, and like everything else it's important that this is a mutual, cooperative endeavor.

**Education** — Portland has an education model, *The Native American Youth and Family Center* (NAYA), with an incredible record of student achievement by students, Native and otherwise, who previously were failing and/or dropping out. It blends experiential with academic learning, instills life values, supports families, includes Elders, and provides a caring/loving environment for its students. There is also an active *Indigenous Nations and Native American Studies* program at PSU. I have developed and taught curricula primarily based on understanding living systems, in which students recognize their desire to shift their life-work from a social justice, business, or domination meme to one of Earth based values. The shift occurs in one class period, but unfortunately there hasn't been surrounding curricula to reenforce it. I also combined my graduation project for Antioch's *Whole System Design* and a Certification in *Appreciative Inquiry* to see if a small town, Fairview, OR, could define their desired future around six facets of being sustainable, and the school would develop curricula for the students and would be shared with parents and the rest of the community. The project was terminated when the teachers felt they were on the 'bubble' of National and State measurements, and the Oregon Department of Education wouldn't grant them a waiver. That program can easily be resurrected.

**Science** — It is important to note that our root problem, separation from Earth, began with Empire 4-6 thousand years ago, and science was corrupted by the reductionist belief that mind, body, emotion and spirit were discrete entities with physics limited by Newton's laws. There is a Quantum reality that is intuited by those cultures who speak 'living languages' — those thought to be derived from Earth vibrations. I believe that this understanding is critical for healing the trauma of modernity cultures who've been separated from some life's basic truths. Such work is being done by the Tao Center in Portland.

**Religions** — Religions like science have been deeply impacted by separation from Earth, and we must begin to understand where spirituality was lost, and dogmatic beliefs prevailed — when original blessing became original sin, and prayer shifted from gratitude to requests. Many religions are actively working to better understand what humans have wrought, and take an introspective look their involvement. This work should be a part of the Climate Plan, and due to my own faith and interfaith work I may be able to contribute.

**Commerce** — Our business and commerce needs to shift from the current bottom-line, maximize profits to a system that operates around un-compromised principles of ecologic balance and communal harmony that protects the environment and long range economic viability.

**Governance** — I hope that we will look at Council Governance, it's stress on communal obligations rather than individual rights, gender balance emergent rather than goal oriented design, and how it leads to consensus rather than compromise

**From:** [Joseph Stenger](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Climate Emergency Workplan  
**Date:** Tuesday, August 23, 2022 10:03:31 AM

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To the Members of the City Council:

As a grandparent and a physician concerned about community health, I applaud the development of this Climate Emergency Plan. The opening and closing pages of the Plan stress the urgency of taking definitive action to address the rapidly worsening crisis that has resulted from decades of national and global inaction. The emphasis on climate justice in those sections and in the proposed actions is crucial as a downpayment for deep-seated inequity.

I urge that the City commit adequate monies to turn these ideas into actual solutions. Many items have large budget gaps identified. Unless this is resolved, this document remains aspirational. While such a statement of intent is nice and may make us feel better, it would not actually protect our grandchildren and the environment in which they live.

The lack of action items stated for industry is striking, as this is a huge sector of carbon emissions. Yes, this sector is complex and politically challenging, but that is no excuse for the lack of goals. Without a plan for rapid change to this sector, we ensure that we will not meet overall targets.

Regarding the section on transportation (40% of GHG emissions), it is good to see the implementation of POEM. We must use the best science for any further shift to renewable diesel and biofuels, as proof of lower carbon intensity is variable. We must increase the speed of transition to electrifying via more charging points, more incentives for purchasing EVs, and all public fleet purchasing to be EVs. We must increase the use of transit through reduced costs (especially for low income communities) and through prioritizing transit lanes so that those trips are more rapid. We must push back against ODOT's continued emphasis on private vehicles and plans to widen freeways.

We can plant many more trees in heat-stressed East Portland, resulting in many benefits.

We can fully commit to the grant process of PCEF with its great impact on improving living conditions for recipients, and resist attempts to derail its progress.

I believe Portland can be a leader in civic innovation to reduce carbon emissions. We can do what is needed to be proud of our contributions to improve health and safety for all.

Thank you for taking bold, decisive and effective action!

Joseph Stenger MD  
97211

**From:** [wyrick@teleport.com](mailto:wyrick@teleport.com)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Climate Emergency Workplan  
**Date:** Tuesday, August 23, 2022 2:05:35 PM

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Dear Portland City Council

I read the climate emergency priorities plan and applaud the work done so far.

I urge you to fully fund all parts of this plan.

Please speed up the tree planting by bringing back Friends of Trees programs.

I would also like to see some public relations initiatives letting Portlanders know ways that individuals and groups can help these initiatives.

Thank you

Cathy Wyrick  
4819 SW Vermont  
Portland OR 97219  
503-490-7936

**From:** [Jan Zuckerman](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** CE Work Plan Testimony  
**Date:** Tuesday, August 23, 2022 2:21:55 PM

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Courage, accountability, collaboration and commitment. These are the qualities expected of a teacher who is held responsible for the success or failure of her students. When a teacher sees that her plan doesn't work, she changes it, because the lives of children depend on it. Without these same qualities, the Climate Emergency Work Plan will be nothing but empty words.

According to Mayor Mark Gamba, National Geographic predicts that by 2048, we will have killed our oceans. I agree with him when he says that we need to stop our insane foot dragging when it comes to the climate crisis.

Courage: It will take courage to stop the foot dragging and not just admit that our city has not been doing enough, but take the strong action needed to implement timely policy. It means that we treat the climate crisis as an actual emergency and stop waiting for things to magically fall into place or leave it up to the state or federal government to provide the resources needed to create real and lasting change. It means that we don't simply depend on the Portland Clean Energy Fund for the money needed to implement policy that we know is vital to our survival. It means that our city officials stand up to industry and not have a measly section in the workplan that has no mention of the fossil fuel industry, their impact or responsibility in creating climate chaos or a plan to hold them accountable.

Accountability: What does the approval of this workplan actually mean? Who and what mechanism will be used to hold ourselves and the city accountable? What are the concrete steps being taken to measure our progress and insure we meet our climate goals? The column with this specific and most important information is missing on the workplan. How can we commit to action if we don't hold ourselves accountable? In other words, how can we make progress when in most of the actions stated in this workplan show huge FTE and Funding Gaps and many TBDs?

As a teacher I know what not enough funding and not enough teachers mean. I know what it means for a school district to make false promises, create fancy powerpoints, and ignore the wisdom of teachers and students. It means that our children slip through the cracks and fail, causing long term harm to their success and well-being, while we pat ourselves on the back for our effort. Effort does not translate into enough results, no matter how good our intentions.

How can we trust that the work will get done when it is reported and we hear directly from

staff, that our commissioners and bureaus don't trust one another, that bureaus are short staffed, that there is a lack of funding, that egos, poor communication and disfunction are getting in the way of real progress? How can we have confidence that the climate crisis will be addressed when our Bureau of Planning and Sustainability Commission is going to be split into two? We know that a decision that one bureau makes can completely undo and sabotage another bureaus decision, intentionally or unintentionally. Creating more silos is frightening in a city that is already seen as dysfunctional.

Collaboration: As a teacher for 30 years, much of it spent team teaching, I know that the only way to stay on the same page, and meet the needs of our students and accomplish our goals, we had to have weekly work meetings and daily check-ins. We centered our children in all of our work. If our plan wasn't working, we changed it. We listened to the student, the parents and each other. If all bureaus do not center climate mitigation and resiliency in all decision making, and require every policy to meet a climate test, we are doomed. How does this workplan ensure that bureaus work together to keep our burning house from collapsing on us?

Commitment: We need to think OUTSIDE THE BOX. We need to support and fund alternate forms of transportation such as the Frog Ferry, instead of getting bogged down on infighting. We need a coordinated effort to address shade equity and tree planting as well as street maintenance- not wait for more research and reports. They have already been done. We need all policies to be held to a climate test which is reviewed and approved by a community - led governance structure that ensures that our city leads by example. For god's sake, this is our beloved ecosystem we are talking about, that very one we depend on for our lives. What the hell are we doing?

Either we are in a climate emergency, and we act like it, or we stop repeating the warning and stick to business as usual.

Thank you,  
Jan Zuckerman

**From:** [Wendy Emerson](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Climate Emergency Workplan  
**Date:** Tuesday, August 23, 2022 2:45:51 PM

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I am a working person who does not have extensive time to comment about the Climate Emergency Workplace.. Since, most working people are in that position, and since most of the City Commissioners carry water for the Portland Business Alliance, that is they serve the interest of capital before workers, I shouldn't be surprised to see a plan that is mostly lacking in the kind of substance we are going to need to actually cut our regional emissions in a significant way. It seems to be a bunch of vague promises that might have been appropriate in 1990. Effectively, this plan is business as usual with a few actions to make it look like you are all actually doing something.

Here are the things we would be doing if we were acting in proportion to the emergency in which we find ourselves:

- Ban the use of methane (natural gas) in all new construction.
- Work with state, county, and regional governments, develop a plan to electrify all homes by 2030.
- Halt all new construction of roads and freeways, budgeting only for maintaining and repairing existing infrastructure.
- Implement tolling with necessary adjustments to avoid penalizing low-income residents.
- Raise taxes on gasoline use.
- Use revenue from tolls and taxes to build out transit and bike pedestrian infrastructure as quickly as possible.
- Ration days on which people may drive. (for example, even plate numbers drive on even dates).
- Impose a luxury tax on large internal combustion vehicles.
- Municipalize electric utilities. We have failed to implement climate policy that reflects what the science tells us we should be doing because the for-profit utilities insist that their profits are more important than anything else.
- Work with all levels of government to implement policies that will encourage the development of agricultural practices that sequester carbon.
- Develop plans to rapidly recover and expand the urban tree canopy, prioritizing urban heat islands.
- Work with all levels of government to implement economic programs that encourage the development of a more localized regional economy.
- Tax the corporations and wealthy as necessary to guarantee permanent housing (not shelters!) for all residents. We are going to experience weather extremes for the coming decades regardless of what we do now because of the pollution we have previously dumped into the atmosphere. We must shelter *all* our resident to protect them. Of course, we should be doing that anyway, climate emergency or not.

If you had a plan with those things and more, along with dates, details and budgets for each item, I might think you are all serious. What you have presented looks like a bunch of BS. Just like the US Congress, you all show up to a four-alarm fire with a squirt gun.

And by the way, when you look into them biofuels are generally just elaborate schemes for turning fossil fuels into something that seems “green” but actually is not. For biofuels to be used at scale, it would require diverting agricultural resources that we need to feed people so that North Americans can carry their lazy asses around in giant vehicles. By some estimates, the net energy returned on energy invested for biofuels isn't much better than one unit in for one unit out. With current agricultural practices, the unit in will be fossil fuels. So, why even bother? Using land to grow biofuels will also inevitably add pressure to clear forests that we should be expanding.

Sincerely,

Wendy Emerson  
503-926-3867  
she/her



**From:** [Ben Stickney](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Portland's Climate Emergency Workplan  
**Date:** Tuesday, August 23, 2022 2:54:37 PM

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Hello,

My name is Ben Stickney, I am a resident of the Kenton neighborhood of Portland. I am writing out of concern that the Climate Emergency Workplan neither adequately addresses the root causes of the climate emergency nor provides appropriate resiliency guidelines to address more frequent extreme heat events and other life threatening climate disasters.

The plan, as available to the public, appears to be insufficient in terms of actionable steps toward real solutions. If these are present, there needs to be more transparency on how the City plans to direct Bureaus/Departments to achieve the climate goals described in the Workplan. Especially with the potential change to the City Government after the November election, I am concerned that insufficient collaboration will result in failure to implement solutions that align with the UN targets.

I stand with local climate advocates and organizations in calling for the creation of a Workplan committee to flesh out the details of this promising plan. The issue of the climate emergency could not be more critical, and if we fail to get to net-zero emissions at least before the State mandated 2040 and radically rethink our extractive relationship with the Earth, then generations alive today will grow up in an inhospitable and eventually, unlivable climate. I appreciate the effort the City has been making on climate, but the stakes could not be higher and the current Workplan does not inspire confidence that the City and its Bureaus/Departments can successfully implement such a boardly sweeping and ambitious roadmap to a livable and equitable future.

Please vote NO on the Workplan until there is more clarity in the directives and accountability processes for each Bureau/Department. We need to get this absolutely right.

Thank you for the opportunity to comment,  
Ben Stickney

**From:** [myong.penny@cityofportland.gov](mailto:myong.penny@cityofportland.gov)  
**To:** Council Clerk – Testimony  
**Subject:** Climate Emergency Workplan comments  
**Date:** Tuesday, August 23, 2022 4:03:35 PM

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Dear City Council,

As a Portlander who is extremely concerned about Climate Justice, I look to leaders like Extinction Rebellion for solid analysis and bold ideas that meet the severity of the climate crisis we face. It is in that spirit that I offer ER's analysis and recommendations for improving the City's Climate Emergency Workplan. I hope that you will take the recommendations to heart and take swift action to address the climate crisis in clear and concrete ways.

From ER:

In the two critical years since the passing of the Climate Emergency Declaration, the City can point to few, if any, concrete policies that will result in a substantive decline in emissions, which according to the IPCC needs to begin by 2025 and be halved by 2030. This is unacceptable. We need and demand specific action steps and measurable results.

What is labeled a "workplan" is a vaguely aspirational document, short on specifics. The CED first-year 2021 report was basically that as well; neither has resulted in concrete policies to reduce emissions. **The City Council must create a Climate Emergency Commission** with the best available experts and stakeholders to work with them on concrete action steps, measurable outcomes, and timelines to reduce the city's greenhouse gas emissions.

Portland's recent budget process in a **SURPLUS** year found the City government bragging about a .06% investment in climate related programs. Only a very small percentage of that is slated for emissions reductions or climate mitigation efforts, not very indicative of a full-blown Emergency Response. Many assumptions made in their decarbonization model need more information, and some of which could be challenged. The Police Bureau, which has its own airplane (why??), and other bureaus are omitted from this workplan, even though they consume a large percentage of general fund resources.

Only in the transportation sector does the workplan suggest anything close to a 50% reduction by 2030. Even there, the specific actions under T-1 and T-4 are very vague. Sixteen percent of their proposed transportation reductions rely on an update of the Renewable Fuel Standards. As research scientist [Richard Plevin](#) and other experts have pointed out, renewables come with their own set of climate issues. If the City is relying on the corporate nonsense that Zenith and other corporations quote on the emissions reductions levels, this is totally not to be trusted. That 16% reduction in the model needs to have assumptions carefully vetted, and the City needs to work with Dr. Plevin and others to set good policies that account for the complexity of renewable fuels. It is good that they plan to implement the Pricing Options for Equitable Mobility ([POEM recommendation](#)): a 20-cent fee on parking meter transactions to send an initial price signal about the costs of driving. But we wonder about the timeline for various parts of that, which include:

- Expanding affordable housing [Transportation Wallet](#)
- [BIKETOWN for All](#)
- Multimodal [infrastructure projects](#)
- Research and policy development to inform additional pricing, equitable mobility, demand management, and affordability programs

**BIOFUELS:** Part of the City's climate action work plan relies on "replacing petroleum diesel at the pump." The council is requesting "update the renewable fuels standards." While updating the renewable fuels standards great care must be taken to study this first, and be very cautious about relying on renewable fuels or bio-diesel. There are many different types of renewable fuels and biodiesel, which include major issues. Some of these can actually have a greater negative impact on climate. Biofuel is NOT a silver bullet.

Some of the issues:

1. Induced land use change – cutting down forest to plant fuel stocks, or replacing crops grown for food with crops grown for fuel
2. Can have harmful emissions same as fossil fuels
3. Similar explosive hazards, does not belong in an earthquake liquefaction zone
4. Easy way for fossil fuel infrastructure companies to hide fossil fuel activity; Zenith Energy is doing just that
5. Having more bio-fuels to the mix may drop prices so people will just use more of all fuels
6. Fossil fuels used to grow the feedstock crops often have higher climate impacts than the biofuels produced from those crops

We need to transition away from burning stuff to get around, whether fossil fuels or biofuels.

Few concrete emission reduction actions are presented in the Buildings sector and what they actually will do (for example in B1 and B2) in terms of emissions reductions. We have concerns from our participation in the Build Shift process. See below under B2 there is talk about eliminating carbon in City operations but again no concrete action plans, measurables, or timeline.

The Industry section is incomplete and unacceptable. Behind the scenes the City Council killed off the Portland Clean Air Protection Program. Businesses and industry should not be able to get off the hook for the next 10 years with no expected reductions in emissions. That's ludicrous. The City needs to institute some sort of emissions fees policy asap.

**TREES:** We are disappointed in the vagueness of the sequestration and trees section of this document. Despite calls by the Shade Equity Coalition, there is no mention of street tree planting maintenance. The new Parks tree planting program is committing to less than half of the number of plantings that Friends of Trees has done in the past. Most importantly, there is no commitment to inventory and preserve giant old trees and community shade equity and sequestration resources, even if they are on private property. Waiting two years to begin the tree code revision process is unacceptable unless a moratorium is placed on the cutting of old giants. Look at what Milan, Italy is doing: planting 3 million trees –strategically – by 2030. Can't we do better?

**CONCERNS ON BUILD SHIFT:** We are concerned that discussion was tending to point towards 2026 as the Build Shift implementation target for carbon emissions reductions, since science says there needs to be a significant downturn in emissions no later than 2025 and halved by 2030. Pushing back timelines will result in serious consequences. A ratcheting-down approach of annual decreases starting now is critical, as benefits from reductions will not be seen quickly. We agree with the concept of incentivizing early action. The City needs to have policies in place that will begin a downward decline as soon as possible through private/public partnerships, as well as encouraging the use of PCEF funds in this critical arena.

**BUILDINGS:** Since there is baseline data on commercial buildings, we would recommend plans to start there in 2023 with commercial buildings of 20K square feet (sf) and above, then phase in 10K sf commercial buildings and 20K sf large multifamily rentals two years later, eventually going to 5-unit buildings before 2030. As soon as possible, put into place Resource Centers for both owners and renters.\*

**TENANT/LANDLORD SOLUTIONS:** While we understand the systems life cycle benefits of a customized, internal-based approach to emissions decline, we are concerned both about the ongoing energy cost burden on tenants (ranging from 18-45% of necessary budget expenditures) as well as not adequately reducing emissions on the schedule required by climate science. Landlords should not be able to continue to defer maintenance or delay as long as possible the big ticket items. Short intervals of 2-3 years requiring 10-15% emissions declines in each interval are recommended.

However, we also recommend allowing flexibility in terms of how building owners are going to achieve these reductions, through a customized approach addressing lighting, building envelope upgrades, mechanical upgrades, operations upgrades, and the like, benefitting from cost savings that can be utilized for additional upgrades. Compliance fees will ensure that owners remain on task in meeting building performance standards. Likewise, inspections and compliance certification processes need to be developed. Any owner support should have tenant protection agreements both to prevent displacement or owners passing along higher costs.

**METHANE:** The City should work with Multnomah County to develop health standards to prevent "natural gas" (methane) appliances in new construction (as is being done in NY, CA and Eugene) and begin phasing out natural gas from existing homes. Science makes clear that ventilation and even filtration are not sufficient solutions to the health and climate issues posed by methane, particulate matter, and nitrous oxide. Other communities are working to provide small heating and cooling geothermal districts using existing natural gas infrastructure as a possible transition. The City should work with the County on this for indoor air quality as well as emission reductions. Any cooling standards developed must ensure that cooling sources are energy-efficient and not adding substantially to climate impacts. We support heat pumps, safe renewables, passive designs, and conservation methods to ensure that the long-range costs and climate and health consequences for tenants are not adding harm.

**COMMUNITY ENERGY SOLUTIONS:** The City should immediately begin work on Community Controlled Local Capture and Storage Energy programs, and be ready to increase the percentage they commit to in this, especially if the utilities are not on track. All decarbonization efforts must involve workforce development aspects so that the green transition creates living wage family jobs and clear career paths for advancement, especially for marginalized communities.

**ENERGY:** The City makes a huge point out of the necessity of decreasing energy supply from fossil fuels towards clean renewable sources. The focus is on Portland General Electric which may be around 2/3rds of Portland's households — this is based on comparing service areas, although Pacific Power area of N/NE Portland is denser than areas of the West Hills for example. Pacific Power's parent company PacificCorps presents misleading information on their renewable claims for Portland area, given that PacificCorps' plan for western states is to continue to burn coal for years, then transition primarily to natural gas and nuclear.

PGE plans to continue their Colstrip, MT coal mine units 3 and 4 until 2034. PGE's 2019 Integrated Resource Plan (IRP) states its emissions will still amount to about 4+ million metric tons (MMT) of CO2 in 2030, 2.5 MMT of CO2 in 2040, and almost 2 MMT of CO2 in 2050. More detailed study of utility IRPs will be needed to see how they expect to get to the promised transition. A huge gap falls between what is promised here and whether or not utilities will meet the state's Climate Protection Plan goals (which are not strong enough according to the more recent IPCC reports), especially since the utilities are actively fighting these in court. The City should immediately begin work on Community Controlled Energy programs, and be ready to increase the percentage they commit to.

**WHAT OTHER PLACES ARE DOING:** The City should look at what other cities and states are actually implementing as they consider their own action plan! Communities in California have created their own energy districts and utilize the profits for the

common good—climate and social justice. Kauai, Hawai'i has brought consumer energy costs down by focusing on community solar and reselling residential and offpeak surplus to other utilities or businesses. Portland can and must do better!

Respectfully,

Myong O

1420 SE Center St. , Portland, OR 97202

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Myong O (she/her)

Don't stay silent about the climate crisis; begin by talking with your neighbors. Climate Solutions available at: <https://drawdown.org/solutions>

**From:** [Irene T](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Climate Emergency Workplan  
**Date:** Wednesday, August 24, 2022 7:33:21 AM

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Dear Portland City Council,

I am documentary filmmaker working on a project about Portland and environmental justice. Today, I write to you about the city's "workplan". For a progressive city that prides itself on being "green" the city has done little to reduce emissions. And yet we have started giving more money to the Portland Police Bureau again, which is clearly a dysfunctional institution. The City Council must create a Climate Emergency Commission, and it must include the best available experts and stakeholders to work with them on concrete action steps, measurable outcomes, and timelines to reduce the city's greenhouse gas emissions.

Sadly, Portland's has only made a .06% investment in climate related programs. Only a very small percentage of that is slated for emissions reductions or climate mitigation efforts.

Only in the transportation sector does the workplan suggest anything close to a 50% reduction by 2030. Even there, the specific actions under T-1 and T-4 are very vague. Sixteen percent of their proposed transportation reductions rely on an update of the Renewable Fuel Standards. As research scientist [Richard Plevin](#) and other experts have pointed out, renewables come with their own set of climate issues. If the City is relying on the corporate nonsense that Zenith and other corporations quote on the emissions reductions levels, this is totally not to be trusted. That 16% reduction in the model needs to have assumptions carefully vetted, and the City needs

to work with Dr. Plevin and others to set good policies that account for the complexity of renewable fuels. It is good that they plan to implement the Pricing Options for Equitable Mobility ([POEM](#)) [recommendation](#): a 20-cent fee on parking meter transactions to send an initial price signal about the costs of driving. But we wonder about the timeline for various parts of that, which include:

- Expanding affordable housing [Transportation Wallet](#)
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**BIOFUELS:** Part of the City’s climate action work plan relies on “replacing petroleum diesel at the pump.” The council is requesting “update the renewable fuels standards.” While updating the renewable fuels standards great care must be taken to study this first, and be very cautious about relying on renewable fuels or bio-diesel. There are many different types of renewable fuels and biodiesel, which include major issues. Some of these can actually have a greater negative impact on climate. Biofuel is NOT a silver bullet.

Some of the issues:

1. Induced land use change – cutting down forest to plant fuel stocks, or replacing crops grown for food with crops grown for fuel
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The Industry section is incomplete and unacceptable. Behind the scenes the City Council killed off the Portland Clean Air Protection Program. Businesses and industry should not be able to get off the hook for the next 10 years with no expected reductions in emissions. That's ludicrous. The City needs to institute some sort of emissions fees policy asap.

**TREES:** We are disappointed in the vagueness of the sequestration and trees section of this document. Despite calls by the Shade Equity Coalition, there is no mention of street tree planting maintenance. The new Parks tree planting

program is committing to less than half of the number of plantings that Friends of Trees has done in the past. Most importantly, there is no commitment to inventory and preserve giant old trees and community shade equity and sequestration resources, even if they are on private property. Waiting two years to begin the tree code revision process is unacceptable unless a moratorium is placed on the cutting of old giants. Look at what Milan, Italy is doing: planting 3 million trees –strategically – by 2030. Can't we do better?

**CONCERNS ON BUILD SHIFT:** We are concerned that discussion was tending to point towards 2026 as the Build Shift implementation target for carbon emissions reductions, since science says there needs to be a significant downturn in emissions no later than 2025 and halved by 2030. Pushing back timelines will result in serious consequences. A ratcheting-down approach of annual decreases starting now is critical, as benefits from reductions will not be seen quickly. We agree with the concept of incentivizing early action. The City needs to have policies in place that will begin a downward decline as soon as possible through private/public partnerships, as well as encouraging the use of PCEF funds in this critical arena.

**BUILDINGS:** Since there is baseline data on commercial buildings, we would recommend plans to start there in 2023 with commercial buildings of 20K square feet (sf) and above, then phase in 10K sf commercial buildings and 20K sf large multifamily rentals two years later, eventually going to 5-unit buildings before 2030. As soon as possible, put into place Resource Centers for both owners and renters.\*



**TENANT/LANDLORD SOLUTIONS:** While we understand the systems life cycle benefits of a customized, internal-based approach to emissions decline, we are concerned both about the ongoing energy cost burden on tenants (ranging from 18-45% of necessary budget expenditures) as well as not adequately reducing emissions on the schedule required by climate science. Landlords should not be able to continue to defer maintenance or delay as long as possible the big ticket items. Short intervals of 2-3 years requiring 10-15% emissions declines in each interval are recommended.

However, we also recommend allowing flexibility in terms of how building owners are going to achieve these reductions, through a customized approach addressing lighting, building envelope upgrades, mechanical upgrades, operations upgrades, and the like, benefitting from cost savings that can be utilized for additional upgrades. Compliance fees will ensure that owners remain on task in meeting building performance standards. Likewise, inspections and compliance certification processes need to be developed. Any owner support should have tenant protection agreements both to prevent displacement or owners passing along higher costs.

**METHANE:** The City should work with Multnomah County to develop health standards to prevent “natural gas” (methane) appliances in new construction (as is being done in NY, CA and Eugene) and begin phasing out natural gas from existing homes. Science makes clear that ventilation and even filtration are not sufficient solutions to the health and climate issues posed by methane, particulate matter, and nitrous oxide. Other

communities are working to provide small heating and cooling geothermal districts using existing natural gas infrastructure as a possible transition. The City should work with the County on this for indoor air quality as well as emission reductions. Any cooling standards developed must ensure that cooling sources are energy-efficient and not adding substantially to climate impacts. We support heat pumps, safe renewables, passive designs, and conservation methods to ensure that the long-range costs and climate and health consequences for tenants are not adding harm.

**COMMUNITY ENERGY SOLUTIONS:** The City should immediately begin work on Community Controlled Local Capture and Storage Energy programs, and be ready to increase the percentage they commit to in this, especially if the utilities are not on track. All decarbonization efforts must involve workforce development aspects so that the green transition creates living wage family jobs and clear career paths for advancement, especially for marginalized communities.

**ENERGY:** The City makes a huge point out of the necessity of decreasing energy supply from fossil fuels towards clean renewable sources. The focus is on Portland General Electric which may be around 2/3rds of Portland's households — this is based on comparing service areas, although Pacific Power area of N/NE Portland is denser than areas of the West Hills for example. Pacific Power's parent company PacificCorps presents misleading information on their renewable claims for Portland area, given that PacificCorps' plan for western states is to continue to burn coal for years, then transition primarily

to natural gas and nuclear.

PGE plans to continue their Colstrip, MT coal mine units 3 and 4 until 2034. PGE's 2019 Integrated Resource Plan (IRP) states its emissions will still amount to about 4+ million metric tons (MMT) of CO2 in 2030, 2.5 MMT of CO2 in 2040, and almost 2 MMT of CO2 in 2050. More detailed study of utility IRPs will be needed to see how they expect to get to the promised transition. A huge gap falls between what is promised here and whether or not utilities will meet the state's Climate Protection Plan goals (which are not strong enough according to the more recent IPCC reports), especially since the utilities are actively fighting these in court. The City should immediately begin work on Community Controlled Energy programs, and be ready to increase the percentage they commit to.

**WHAT OTHER PLACES ARE DOING:** The City should look at what other cities and states are actually implementing as they consider their own action plan! Communities in California have created their own energy districts and utilize the profits for the common good—climate and social justice. Kauai, Hawai'i has brought consumer energy costs down by focusing on community solar and reselling residential and offpeak surplus to other utilities or businesses. Portland can and must do better!

Thank you,

Irene T. H.

**From:** [Nancy Hiser](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** The City and Policies on Climate Emissions  
**Date:** Wednesday, August 24, 2022 7:33:09 AM

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Declaring a Climate Emergency two years ago, the ***City still doesn't have a single policy that will substantially reduce climate emissions in line with climate science.***

A measly .06% investment in climate related programs is grossly inadequate.

In the transportation sector the workplan suggests close to a 50% reduction of emissions by 2030 but the specific actions under T-1 and T-4 are vague. The Renewable Fuel Standards come with their own huge set of climate issues and risks.

Relying on the corporate nonsense that Zenith and other corporations quote on the emissions reductions levels is a joke. It is laughable to trust Zenith on any statements given their history.

The City needs to work with Dr. Plevin and others to set good policies that account for the complexity of renewable fuels.

What are the timelines for the following?

- Expanding affordable housing [Transportation Wallet](#)
- [BIKETOWN for All](#)
- Multimodal [infrastructure projects](#)
- Research and policy development to inform additional pricing, equitable mobility, demand management, and affordability programs

**TREES:** The new Parks tree planting program is committing to less than half of the number of plantings that Friends of Trees has done in the past. Most importantly, there is no commitment to inventory and preserve giant old trees and community shade equity and sequestration resources, even if they are on private property.

**CONCERNS ON BUILD SHIFT:** Science says there needs to be a significant downturn in emissions no later than 2025 and halved by 2030. Targeting 2026 is not acceptable.

**BUILDINGS:** There is baseline data on commercial buildings, so why not start there in 2023 with commercial buildings of 20K square feet (sf) or more, then phase in 10K sf commercial buildings and 20K sf large multifamily rentals two years later, eventually going to 5-unit buildings before 2030. As soon as possible, put into place Resource Centers for both owners and renters.\*

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delay as long as possible the big ticket items.

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**COMMUNITY ENERGY SOLUTIONS:** The City should immediately begin work on Community Controlled Local Capture and Storage Energy programs, and be ready to increase the percentage they commit to in this, especially if the utilities are not on track. All decarbonization efforts must involve workforce development aspects so that the green transition creates living wage family jobs and clear career paths for advancement, especially for marginalized communities.

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Thank you.

Sincerely,

Nancy Hiser  
Linnton NA



**From:** [Indi Namkoong](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** 350PDX Written Testimony: Agenda Item 708, Climate Emergency Workplan  
**Date:** Wednesday, August 24, 2022 3:09:33 AM  
**Attachments:** [350PDXCEWPublicComment.pdf](#)

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Hello,

I've attached a PDF of written testimony on Council's 8/24/22 Agenda Item 708, the Climate Emergency Workplan resolution, on behalf of 350PDX. Please feel free to contact me with any questions.

All the best,



**Indi Namkoong** (*she/they*)  
Coalition Manager, [350PDX](#)

**P:** (971) 350-8095 (call or text!)

**E:** [indi@350pdx.org](mailto:indi@350pdx.org)

I'm in the office **Monday - Thursday**



**August 23, 2022**

**To: Mayor Wheeler, Commissioner Carmen Rubio, Commissioner Jo Ann Hardesty, Commissioner Mingus Mapps, and Commissioner Dan Ryan:**

Dear Mayor and Commissioners,

On behalf of 350PDX, I'd like to thank you for the opportunity to provide public comment on the Climate Emergency Workplan.

The Climate Emergency Workplan speaks to the urgency of the climate crisis that Portland is facing and the need for the City to take immediate, bold action. If implemented in full with thorough public process and transparency, we believe the Workplan will be a critical tool to Portland's climate mitigation and resilience efforts in the years to come. However, the trajectory of other City climate initiatives in recent years leaves us concerned that this outcome is far from guaranteed. It is imperative that you, the City Commissioners, make sustained action and follow-through on the Climate Emergency a central priority for this Council and your Bureaus. This means:

1. **Supporting BPS and other bureau staff** in the heavy lifting that will be required to drastically reduce Portland's carbon emissions and build community resilience in the face of the climate crisis.
2. **Approving each program and funding request** when they come across your desk from now to 2025. Approving this resolution isn't enough; you must follow through with the support and resources necessary to successfully implement the action.
3. **Ensuring PCEF is used as intended.** PCEF has been mentioned as a funding source for implementing some climate action projects, but these funds are not guaranteed by the allocation process currently outlined in City Code Chapter 7.07. The city must be prepared to provide funding for these priority projects in the event that PCEF grant money is unavailable.
4. **Ensuring that there is thoughtful, regular, accessible, funded, community engagement that promotes collaboration and truly centers communities on the frontlines of the climate crisis.** While the 2015 CAP included a section called Community Engagement, Outreach, and Education, the Workplan has no such section. This is alarming because community engagement and leadership is critical to the success of the City's climate work. In particular we want to call out:
  - a. the demands and concerns that have repeatedly been raised by Portland youth at events like May's climate strike . The City needs to authentically engage youth





as true partners valued for their wealth of knowledge and expertise on climate solutions as much as for their lived experience.

- b. the fact that there was no robust, collaborative community engagement for the creation of this new climate action plan, and
- c. the need to sustain overall CED commitments to Resolution 3:
  - i. *The City of Portland will advance climate justice and climate action initiatives that are led by the community, especially frontline communities and youth from frontline communities, and accelerate investments in projects that benefit these communities in ways that are restorative, reparative, and build present and future well-being and wealth.*

While the City has engaged youth, BIPOC, and low-income stakeholders on key CED deliverables on their terms, we are concerned that climate action initiatives that originate from and are led by frontline communities in Portland often do not receive the same attention or investment. We urge the City to meaningfully implement Resolution 3 across its climate and sustainability work rather than limiting itself to community participation opportunities outlined explicitly in the CED.

**5. Moving beyond actions that are low-hanging fruit and non-controversial.**

- a. Continuing business as usual and stalling on energy policy has resulted in a 3% increase in carbon emissions since 1990. This is antithetical to one of the most basic goals of the city's climate work. The policies we need to make deep, transformational change will be difficult because they challenge the status quo and disrupt the harmful systems that continually prioritize profit and entrenched power structures over the health and well-being of people and the environment. This would include, for example,
  - i. Not giving industry a pass for the next decade to continue polluting the air, land, and soil and keeping communities at risk of catastrophic accidents.
  - ii. Cutting ties with business groups that actively work to maintain the status quo and to undermine system change
  - iii. Supporting a community-led vision of housing justice that is integral to climate justice

**6. Ensuring transparency and accountability of the City's Climate Emergency work through formal progress reports and vigorous oversight.**

- a. It is concerning that the Workplan seems to be serving as the required progress reports on the 2020 Climate Emergency and the 2017 100% Renewable Energy Resolutions; these resolutions called for annual and biannual progress reports, respectively. A progress report shows what was laid out, what has happened, and what hasn't happened and is an opportunity for stakeholders - including community, utilities, and bureaus to discuss barriers and make changes so that



goals can be achieved. Without these formal progress reports, it is unclear, e.g., how utilities will be held accountable and how bureaus and commissioners will be held accountable for goals laid out in these resolutions two to five years ago.

- b. We learned during the July 20 City Council hearing that a new sustainability commission would be launched for accountability on the Workplan. But no details have been made widely available about the purpose, scope, process, authority and timeline for this commission. If this commission is to be the result of the impending split of the Planning and Sustainability Commission (PSC) announced recently by Commissioner Rubio, this information must be shared with the public, along with clarity on the new commission's role in the legislative process and the powers it would have over the Workplan's implementation. Reports on the PSC split have pointed to a lack of clarity on the commission's authority and responsibilities as a key factor in its internal conflicts over the last decade. We cannot afford to repeat these mistakes with the oversight of such a critical City function. A new sustainability commission should be clearly empowered to advocate for the implementation of the Workplan and other City climate resolutions and hold City Council accountable to their advancement.

7. **Supporting the amendments to the City's charter that will be on the ballot this November.** In particular, moving away from the commissioner-in-charge of bureaus format will help bring stability to bureau work and improve cross-bureau collaboration which is critical for implementing climate emergency work.

By voting for the resolution adopting the Climate Emergency Work Plan, you are signaling to Portland communities that you will support the work laid out in the plan. There is no latitude for inaction; the risks are too great. We will be watching you and holding you to account.

Sincerely,

*Indigo Namkoong*  
*Coalition Manager, 350PDX*

**From:** [Floyd Vergara](#)  
**To:** [Jacob Andria](#)  
**Cc:** [Council Clerk – Testimony](#)  
**Subject:** Clean Fuels Comments on Portland Climate Emergency Workplan (previous item #656)  
**Date:** Wednesday, August 24, 2022 9:17:15 AM  
**Attachments:** [Clean Fuels Comments on OR RFS Hearing Aug 24 2022 \(FINAL with Attachment\).pdf](#)

---

Please find attached for the City Council's consideration comments from Clean Fuels Alliance America on the proposed changes to the RFS regulation pursuant to the Portland Climate Emergency Workplan.

**Floyd Vergara, Esq., P.E.**

Clean Fuels Alliance America  
Director of State Governmental Affairs  
916-760-8870  
1415 L Street, Suite 460  
Sacramento, CA 95814  
[www.cleanfuels.org](http://www.cleanfuels.org)

**Better. Cleaner. Now!**



via Electronic Filing  
August 24, 2022

Andria Jacob  
Climate Policy and Program Manager, Bureau of Planning and Sustainability  
City of Portland  
1810 SW 5th Ave, Suite 710  
Portland, OR 97201

Re: Clean Fuels Comments on Climate Emergency Workplan (previous agenda item #656)

Dear Ms. Jacob,

Thank you for the opportunity to provide comments on the proposed amendments to the City's Motor Vehicle Fuels regulation pursuant to the Portland Climate Emergency Workplan. Clean Fuels Alliance America (Clean Fuels)<sup>1</sup> is the U.S. trade association representing the domestic biodiesel, renewable diesel, and sustainable aviation fuel industries.

Clean Fuels strongly supports, with one important caveat, the City's objective of phasing out fossil distillate fuel and replacing it with biodiesel and renewable diesel (and blends thereof). These sustainable and renewable fuels achieve on average 74% reduction in greenhouse gas (GHG) emissions according to lifecycle assessments by Argonne National Laboratory and others. In addition to significant GHG reductions, our fuels significantly reduce diesel particulate matter (diesel PM) in older legacy vehicles, which can provide immediate public health benefits, especially in environmental justice communities, as demonstrated in the recent Trinity Study.<sup>2</sup>

In Portland alone, the Trinity Study shows a switch to 100% biodiesel in older legacy vehicles would decrease diesel PM exposure substantially, avoiding 13 premature deaths each year, reducing asthma attacks by over 7,000 each year, and decreasing over 1,400 reported sick days annually, all totaling over \$110 million in avoided health costs each year (Fig. 1).<sup>3</sup>

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<sup>1</sup> Clean Fuels (formerly National Biodiesel Board) is the U.S. trade association representing the biodiesel, renewable diesel, and sustainable aviation fuel (SAF) industries. Our members include farmers, renderers, fuel producers, marketers, and technology developers. Biodiesel, renewable diesel, and SAF are made from the same waste and co-product fats, oils, and grease feedstocks, such as used cooking oil, animal tallow, distillers corn oil, and surplus co-products from soybean and canola production.

<sup>2</sup> See [https://www.biodiesel.org/docs/default-source/trinity-study/trinity-nbb-transportation-health-risks-review-v1-03.pdf?sfvrsn=ec0f774a\\_2](https://www.biodiesel.org/docs/default-source/trinity-study/trinity-nbb-transportation-health-risks-review-v1-03.pdf?sfvrsn=ec0f774a_2), accessed Aug. 23, 2022.

<sup>3</sup> Trinity Study, op cit., at 6-61 through 6-72.

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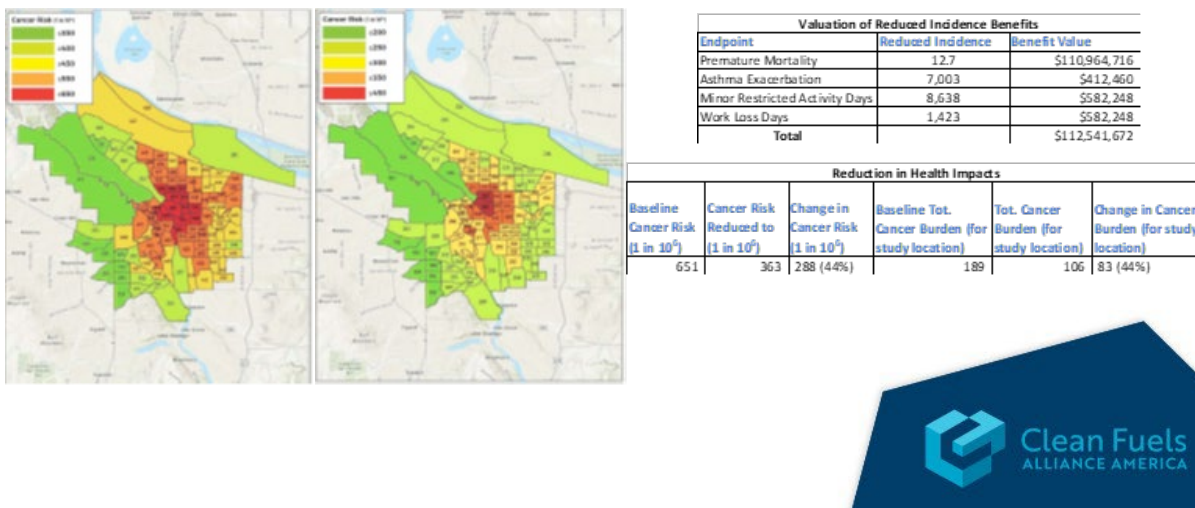
Massachusetts Office  
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Wilmington, MA 01887

978.267.3020

Fig. 1. Projected Cancer Risk Reduction and Other Health Benefits by Switching to Biodiesel

## B100 BENEFITS: PORTLAND, OR – TRANSPORT

Cancer Risk Pre/Post-Switch to B100 (Up to 83 fewer cases)



Source: [Trinity Study](#), 2021.

These benefits are especially important for disadvantaged and environmental justice communities, many of which are located at or near sites that still use high levels of petroleum diesel. At these sites, the legacy vehicles can benefit from the reduced diesel PM emissions which biomass-based diesel provides. And these sustainable diesel replacements would benefit even the more modern, 2007 and newer engines by reducing their GHG emissions and particle loading of the diesel particulate filters, thereby improving their longevity and maintenance.

Further, it's important to note the key role biodiesel and renewable diesel have in displacing petroleum diesel, keeping the anthropogenic carbon emissions associated with fossil fuels like petroleum diesel from further exacerbating the climate crisis. In California and Oregon, these sustainable diesel replacements are projected to displace over 1.3 billion gallons<sup>4</sup> of petroleum diesel in 2021 alone.

### Overly Restrictive Carbon Intensity Requirement

The one concern we have with the proposed changes is the requirement that the only biofuels allowed under this regulation would be those that have a carbon intensity (CI) of 40 g CO<sub>2</sub>e/MJ or less. This appears intended to encourage the use of biofuels that are among the lowest carbon intensity biofuels (e.g., waste-based biofuels). While that objective is laudable, it does not reflect the current low carbon fuels markets on the West Coast. Simply put, the strong

<sup>4</sup> [LCFS Dashboard](#), [2021 CFP Clean Fuels Forecasts](#), and [2022 CFP Clean Fuels Forecasts](#), accessed Aug. 23, 2022.

market signal from the California Low Carbon Fuel Standard (LCFS) regulation pulls, and will continue to pull, virtually every single gallon of the very lowest carbon biofuels produced in the U.S. Those volumes that do not make it to California are, in turn, sent to Oregon at large and, after the start of its Clean Fuel Standard (CFS) in 2023, to Washington state. Thus, the lowest carbon biofuels will be drawn to other markets because they put an explicit price on carbon reductions, which Portland's RFS does not.

Thus, to ensure the Portland market is adequately served, we recommend the proposed amendments be revised to include no minimum carbon intensity criterion. Since the regulation already prohibits the use of fuels derived from problematic palm feedstocks, there is little need to add an additional restriction on qualifying carbon intensity.

To the extent the City of Portland determines a minimum GHG reduction is desirable, we suggest specifying that biodiesel or renewable diesel meets the ordinance if the fuel meets the federal Renewable Fuel Standard (RFS) requirements for issuance of a D4 (biomass-based diesel, i.e., biodiesel and renewable diesel) or D5 (advanced biofuel) RIN<sup>5</sup> credit. Both D4 and D5 RINs, by definition, require a minimum 50% GHG reduction. This will ensure that the Portland market has access to all environmentally beneficial biodiesel and renewable diesel while still furthering Portland's efforts to address climate change effectively. Moreover, this will help ensure that Portland continues to have access to biodiesel and renewable diesel (and their blends) that have optimal storage and performance characteristics throughout the year.

### **Conclusion**

Clean Fuels and its members applaud the City of Portland's bold vision and leadership in its effort to phase out fossil fuels. To ensure the phase out is implemented smoothly, we recommend revising the proposed changes to not include a carbon intensity limit or, if one is deemed necessary, to allow biodiesel and renewable diesel fuels that meet the federal RFS requirements for D4 or D5 RINs. We look forward to working with Portland staff in implementing this groundbreaking policy.

Sincerely,



Floyd Vergara, Esq., P.E.  
Director of State Governmental Affairs  
Clean Fuels Alliance America

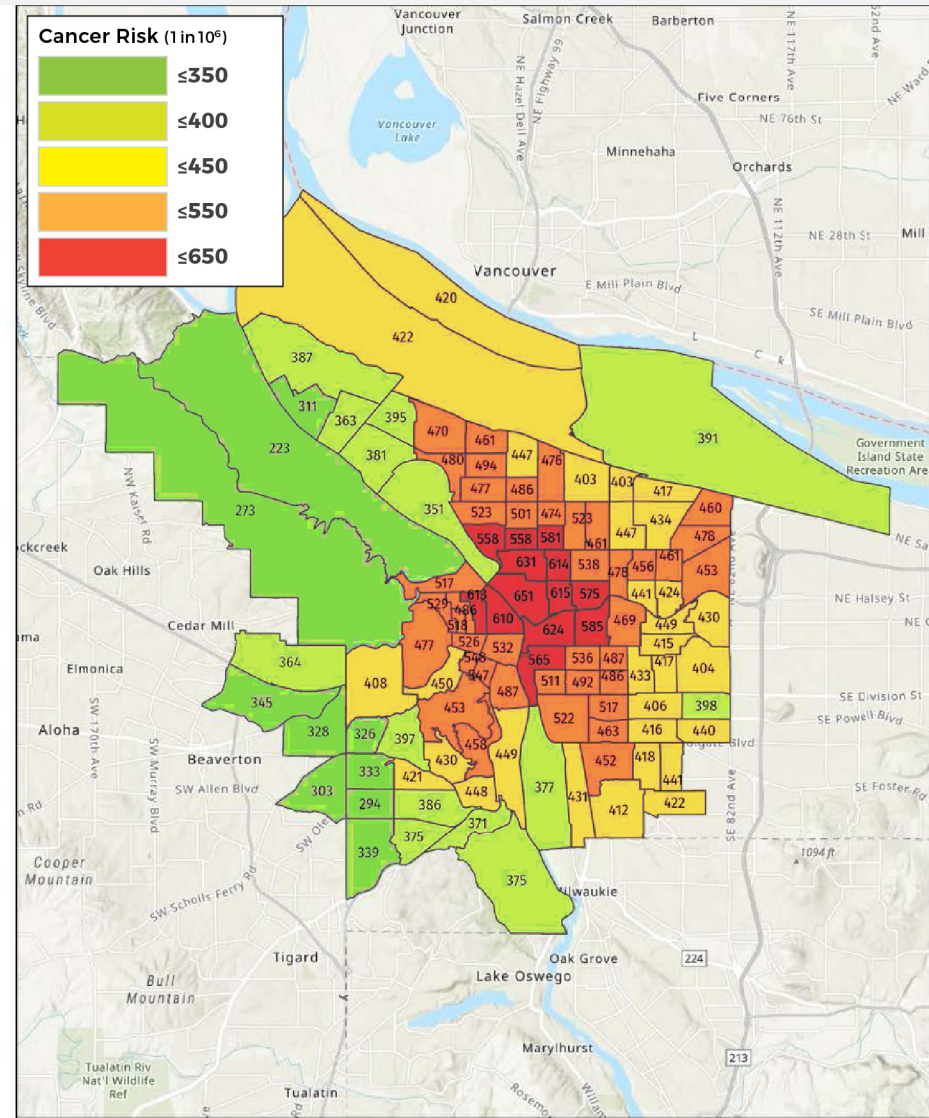
Attachment

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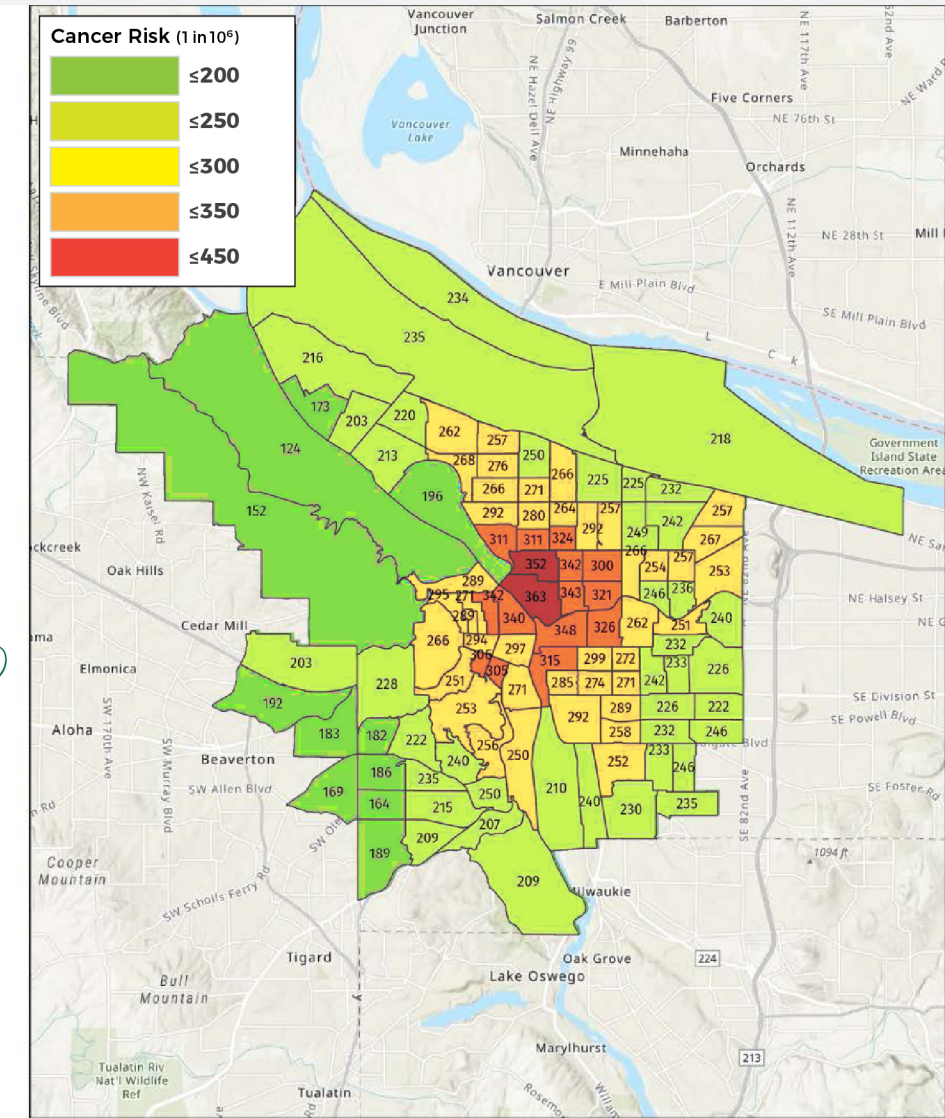
<sup>5</sup> Renewable Identification Number, see <https://www.epa.gov/renewable-fuel-standard-program/overview-renewable-fuel-standard>, accessed Aug. 23, 2022.

# HOW BIODIESEL CAN IMPROVE PORTLAND'S PUBLIC HEALTH

## Cancer Risk from Diesel Transportation Particulate Matter (Portland, OR)



## Reduced Risk from B100 Biodiesel (Portland, OR)



By replacing petroleum diesel with lower-carbon biodiesel, Portland can eliminate harmful transportation emissions, reducing communities' medical costs and healthcare burdens.



**44%**

Lower cancer burden = 83 fewer cases

**\$111 MILLION** per year

13 avoided premature deaths  
(longer lives)



**\$412,000** per year

7,000 fewer asthma attacks  
(lesser symptoms)

**\$582,000** per year

8,000 fewer restricted-activity days  
(more exercise)



**\$582,000** per year

1,400 fewer lost work days  
(greater productivity)



According to Biodiesel Health Benefits Study

Materials sponsored by soybean farmers and their checkoff.

[nbb.org](http://nbb.org)

[biodiesel.org](http://biodiesel.org)

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

**City Council Meeting - Wednesday July 20, 2022 2:00 p.m.**

<b>Agenda No.</b>	<b>First Name</b>	<b>Last Name</b>
656-01	John	Wasiutynski
656-02	Oriana	Magnera
656-03	Mary	Peveto
656-04	Nikita	Daryanani
656-05	James	Paulson
656-06	lynn	handlin
656-07	Sorin	Garber
656-08	Jan	Zuckerman
656-09	Liam	Castles
656-10	Juliet	Stumpf
656-11	Cathy	Tuttle
656-12	Brooke	Kavanagh