



**PORTLAND  
CLEAN ENERGY  
COMMUNITY BENEFITS  
FUND**

**Portland Clean Energy Community Benefits Fund (PCEF)  
Climate Investment Plan  
Full Draft Public Comment  
May 16 – June 2, 2023**

**Public comment received via email to  
[cleanenergyfund@portlandoregon.gov](mailto:cleanenergyfund@portlandoregon.gov)**

## Table of emailed comment / letters

ID	Stakeholder Group	Organization	Contact Name
E01	Interested community member		Jack Petty
E02	Interested community member		Darlene Chirman
E03	Interested community member		Helen Brodahl
E04	Community org	Habitat for Humanity	Sarah Radcliffe
E05	Interested community member		Judy Ringenson
E06	Education	School District Members	Danny Cage
E07	Community org	Participatory Budgeting Oregon	Blanca Gaytan Farfan
E08	Government	Portland Bureau of Transportation	Sierra Stringfield
E09	Government	Portland Parks and Recreation	Laura Lehman
E10	Community org	Willamette Riverkeeper	Bob Sallinger
E11	Interested community member		Aida Kelsaw
E12	Community org	University Park Neighborhood Association	Thomas Karwaki
E13	Government	Commissioner Gonzalez	Nick Coffey
E14	Government	Portland Community College	Colette Tipper
E15	Government	Portland Water Bureau	Sarah Santner
E16	Business	Portland General Electric	Nik Blosser / Julie Franz
E17	Government	Commissioner Mapps	Comm. Mingus Mapps

## Reyes, June

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**From:** Baraso, Sam  
**Sent:** Saturday, May 27, 2023 11:32 AM  
**To:** Lister, Cady; Reyes, June  
**Subject:** FW: Participatory budgeting opportunities

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**From:** General Jack <y.garfan@gmail.com>  
**Sent:** Friday, May 26, 2023 7:06 AM  
**To:** Clean Energy Fund <CleanEnergyFund@portlandoregon.gov>  
**Cc:** Schoene, Jillian <Jillian.Schoene@portlandoregon.gov>; Commissioner Rubio <Comm.Rubio@portlandoregon.gov>; Baraso, Sam <Sam.Baraso@portlandoregon.gov>; Villatoro, Ranfis <Ranfis.Villatoro@portlandoregon.gov>; Horst, Megan <Megan.Horst@portlandoregon.gov>; Jim Labbe <jlabbe@pboregon.org>  
**Subject:** Participatory budgeting opportunities

I support the plan to spend money on efforts to fight climate change in areas like green infrastructure, energy efficiency and schools. I would really like to see participatory budgeting (PB) be part of the process. PB is a democratic process that allows ordinary people to have a voice at the table.

The people in this community have enormous knowledge and lived experience that can help inform how the money should be spent. Their voices should be heard and their words should be a crucial part of the conversation.

In particular, youth voices should be heard. We are the ones inheriting the situation, and we should have an ability to help set the path we will be taking.

I would like to see PB become a mechanism for allocating the \$50 million to “Climate Friendly Schools.”

1. Rapid Growth of School-based PB: PB in schools is rapidly developing around the US and the world. Case studies and ongoing initiatives in New York City, Phoenix, Seattle, Rhode Island, and beyond could inform implementation of school-based PB in Portland.
2. Racial Equity: Youth and school-based PB provides a targeted universalist strategy that centers Black, Brown, and Indigenous people who represent a higher percentage- and in East Portland a majority- of the population under 18 years of age.
3. Youth Voice, Youth Vote PB in East Portland: Youth Voice Youth Vote (YV<sup>2</sup>) PB has engaged hundreds of East Portland youth in designing and implementing Oregon’s first PB process. Through YV<sup>2</sup> PB, 13 to 25 year olds are developing projects and voting on how to allocate \$500,000 in COVID recovery projects in Senate Districts 24 and 25. Among other things, YV<sup>2</sup> PB has built a cohort of predominantly youth of color who are experts in PB design and implementation.
4. Ongoing school-based PB conversations: Students and Board Directors in both Portland Public School District and in David Douglas School District are already exploring school-based PB projects.

Thank you for your consideration.

Sincerely,  
Jack Petty  
PBO Advocacy Cohort/DDHS Student

DARLENE CHIRMAN  
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May 31, 2023

Bureau of Planning and Sustainability  
City of Portland  
[CleanEnergyFund@portlandoregon.gov](mailto:CleanEnergyFund@portlandoregon.gov)

**RE: Full draft Climate Investment Plan**

Portland Clean Energy Fund Committee and City staff:

I have reviewed the full draft Climate Investment Plan (CIP); I am very pleased to see this plan moving forward. I commented March 30, 2023 on the Preliminary draft of the CIP. I have some comments on the full draft which may strengthen the Plan and its implementation.

**Energy Efficiency and Renewable Energy.**

These program categories largely address buildings, which account for 41% of carbon emissions in Multnomah County. The programs to fund energy efficiency and renewable energy in new construction and rehabbing older buildings has already been very successful, and appears to be well utilized by local non-profits providing housing for homeless and low-income residents. I applaud PCEF for these accomplishments. This appears to be categorized as the regulated multi-family housing.

I recognize the barriers of energy efficiency improvements in the unregulated multifamily affordable housing. Most property owners do not pay the utilities, and thus incentives are harder to create. Allowing for health and safety upgrades to be funded should be an incentive, since some of these are likely requirements for landlords. The explanation of rent stabilization requirements is unclear—will NO rent increases be allowed for the 4-9-year period, depending on the extent and cost of upgrades? Or just less than what is allowed under current laws? If it is zero, I expect that participation will be quite low. Maintenance costs continue to rise.

Some other housing types are not mentioned, and I am wondering if they have been considered. For example, retirement homes that serve low-income residents, and adult care homes (such as those that accept Medicaid payment/rates). These facilities do pay the utilities so would seem more amenable to energy efficiency upgrades. The utility costs are likely quite high as these facilities are occupied by residents and staff round-the-clock, with meal preparation and laundry in-house; therefore the potential for significant savings in utility bills and CO2 reductions. The utility savings would help keep monthly fees affordable for residents. I also wonder about condominiums, where the individual units are owner-occupied, but outside maintenance is usually done by the homeowners' association. Thus, PCEF or a contracting agency would likely need to deal with both homeowners and the HOA.

Given the federal and state incentives available for energy efficiency and renewable energy systems, the request for grant proposals should state that the proposal should include information for property owners/managers of other funding sources for upgrades, that can be layered to increase the efficiency updates, further reduce CO2 emissions, and lower the cost for owners/residents.

## **Transportation Decarbonization.**

I commented in March that the five percent—corrected to 11%-- of the funds allocated to transportation decarbonization seemed inadequate, given that transportation accounts for 42% of carbon emissions in Multnomah County. I am pleased to see the addition of SP13, Targeted Electric Vehicle Financing Tools at \$35,000,000 to assist the priority population in adopting electric vehicles.

There are two programs that can help school districts transition to electric school buses. PCEF staff or City Council should decide if adding additional incentives should be a separate program or be part of the school district requests. School districts can apply to the Clean School Bus Program provides funding to schools for replacement of diesel buses with electric or hybrid buses. This is part of the Infrastructure Investment Act, and runs from 2022-2026. The PGE Electric School Bus Fund will pay the cost differential between standard and electric school buses plus charging facilities. Transportation contractors are eligible for this program. For the local program, there may be a greater need and opportunity to layer incentives with grants or subsidized loans that could be provided by PCEF, and possibly for installation of solar panels for on-site renewable energy generation. With assistance from the infrastructure bill and PFEC, perhaps the Portland School District can reach its 2040 goal of an all-electric school bus fleet sooner (See Climate-friendly public schools, below). There are current studies of V2G—vehicle to grid and V2B—vehicle to buildings, using electric buses for battery storage. This might be most applicable for PCEF/Portland when developing a school as severe weather facility. During a power outage, energy stored in bus batteries could power the gym or cafeteria for community residents.

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

I am pleased to learn of PBOT's Transportation Wallet Access for All (AFA) program. Adding funding for program expansion is a good use of PCEF funds. I don't know what the funding is for the current Transportation Wallet AFA program, but wish to ensure that PCEF funding is additive, expanding the priority residents who have access to this program.

Grant-funded programs that promote electric vehicles should provide information for residents on available incentives to purchase/lease new or used electric vehicles. The federal tax credits and upfront rebates are quite complicated, varying with income and type of vehicle. The incentives, up to \$7500 per vehicle are in place 2023-2032. There may also be state incentives and utility rebates for charging installation.

Many organizations own passenger vans for carrying clients/residents—such as low-income supportive housing and homeless shelters. In addition, non-profits provide services for the priority populations, such as the Oregon Food Bank and Urban Gleaners. PGE Drive Change Fund is supported by the sale of Oregon Clean Fuels Program credits. The highest priority for successful grants is to non-profit or government agencies that provide services to vulnerable populations. Matching funds from other sources make the grants more competitive, which is where PCEF funds could make a difference. As currently written, are these organizations eligible to apply for PCEF grants and/or subsidized loans that could leverage Drive Change Fund applications?

GoForth has received grant funding from the US Department of Energy to establish Electric Car Share programs partnering with affordable housing in 8-9 cities including Portland. Car share siting in Portland affordable housing sites with GoForth could supplement good public transit. Once the pilot sites are underway and evaluated, GoForth will be seeking funding for program expansion with other affordable housing partners. PCEF and the PGE Drive Change Fund are two likely sources

of funding to keep this program affordable. I would like to see the first Climate Investment Plan include potential funding for this type of program once the pilot evaluation is complete, not needing to wait until the second plan 5 years from now.

I attended the PCEF Climate Investment Plan Briefing and Open House at the Alberta House on May 24<sup>th</sup>. I was pleased to learn that PCEF has funded an electric van shuttle service for residents at Bybee Lakes Hope Center, which is not served by TriMet, and that GoForth has been contracted to assist in setting up the shuttle program, plus electric bikes. I also learned from staff that PCEF will expand green transportation programs in the future, but needs more time to explore options and gear up.

### **Community Severe Weather Response.**

Strategic Program 5 will fund building upgrades for community severe weather response. The draft Plan states the building sites will be owned and/or managed by eligible government entities and non-profit organizations. Thinking about what buildings might be available in and accessible to low-income neighborhoods in Portland, I urge you to include schools, such as gymnasiums, cafeterias or other assembly buildings. Public recreational facilities could be appropriate (Mt Scott Community Center is utilized as a severe weather facility). But I fear that such facilities are rare in low-income neighborhoods. Branch libraries could serve this function. Churches also serve as community centers, and may be willing participants in a program to provide severe-weather centers with appropriate energy upgrades.

Including solar systems with battery backup is a crucial element, to provide life-saving energy for residents who require medical equipment, for example, during power outages. This could serve the wider community for phone charging, etc. in power outages. I don't understand the statement:

None of the clean energy programs except for SP5: *Building upgrades for community severe weather response* allows PCEF funding to be invested in equipment or appliances that use fossil fuels (p20).

Does this mean that PCEF might fund a diesel generator if a solar system cannot be installed? Please be more specific.

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

### **Green infrastructure.**

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

I have observed that some neighborhoods, especially low-income ones, lack sidewalks and parking strips where trees can be planted. In my March comment letter, I suggested that staff work with PBOT in such circumstances, to evaluate if bulb-outs could be constructed at intervals along such streets to accommodate tree planting. I subsequently learned of the Trees in the Curb Zone Pilot Project within the Bureau of Environmental Services. The pilot planting is planned in the fall of 2023 in the Brentwood Darlington neighborhood. I would like to see funding for expansion of this program in the CIP provisionally, pending the analysis of the pilot after planting and has been installed for a while—impact on neighboring residents, traffic flow, parking. It will be quite a while to see the shade impact, as trees grow slowly!

The draft CIP draft does not address what city bureau(s) will be responsible for the approved tree planting program for the coming 5 years—The Bureau of Environmental Services, Parks and

Recreation's Urban Forestry, PBOT, or a combination. I also urge that the PCEF staff work with non-profits such as Friends of Trees and Verde that already have established connections with the vulnerable neighborhoods lacking adequate tree canopies.

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

I have a suggestion that should be explored. This is one of the reasons I was looking in the draft CIP for the Portland City Bureau that will be largely responsible for the tree canopy expansion program (and did not find). Recent federal programs support urban forests, and the City could apply for funds for tree planting and establishment care as allowed by the programs. Grants awarded could fund a portion of the \$40,000,000 for tree planting, and the savings could be applied to long-term tree maintenance in low-income neighborhoods, without individual application. "Preserved" funds could be added to the Tree Canopy Maintenance Fund. Low-income residents in mixed-income neighborhoods could still qualify for funds by application. In future 5-year planning cycles, as tree planting may need to be less intensive, increasing funds could be applied to ongoing tree maintenance in low-income neighborhoods. At the end of the 5-year establishment period for new trees, I suggest yearly monitoring of the planted trees. This should apply to the trees planted under previous City-sponsored programs such as Friends of Trees, and can be contracted with community groups or companies.

### **Regenerative Agriculture.**

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

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

### **Climate-friendly public schools.**

The full draft plan mentions three categories of assets where PCEF could play a role in reducing emissions and improving the schools for local residents. With 60 "qualifying" schools among 6 school districts, based on location in the City, and more than 50% of students qualifying for free and reduced lunch, plus other factors, there are many opportunities! Schools play an important role in communities, with the grounds utilized by local residents outside of school hours for recreation. The school buildings may be used for community functions as well. I think the flexible proposal to be solicited from school districts within one year of the CIP approval, is an excellent approach, which allows the districts to layer CIP energy efficiency projects with bond-funded projects.

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

RE school transportation, the federal Clean School Bus Program provides funding to school for replacement of diesel buses with electric or hybrid busses, and runs from 2022-2026. Several Oregon school districts have been awarded funds for low emission buses, but I don't think any in the Portland region have been funded to date. There may be opportunities for PCEF funds to layer with the federal grant programs. For example, if a school is granted funds for electric buses, PCEF might fund the charging facilities and solar panels for renewable energy on site—on the roof or more



commonly a carport-like structure over a parking area. I don't think the federal programs cover privately-owned buses that school districts contract to transport students, but the PGE Electric School Bus Fund will. Since the local fund covers only the differential cost of electric buses from standard (diesel), there may be a larger role for PCEF in promoting this transition. I have found little information of the inventory of school buses in the 6 Portland school districts; Portland School District now 2 electric buses used for Special Ed students, and one more to be delivered this summer. But high incidence of asthma in low-income populations, associated with poor air quality, in addition to climate impacts from diesel buses, gives urgency to this transition.

School yards have a great potential for tree canopy for shade, and potentially for native gardens or vegetable gardens for student participation in growing fresh food for school lunches. The initial maintenance for planted trees will be an important component; in designing plantings, the potential for de-paving part of the school grounds should be considered. I have heard that schools are reluctant to take on the maintenance of trees on school grounds; discussion of possible long-term maintenance, or the school directing some utility savings for tree maintenance are worthwhile.

As mentioned previously, schools may be good partners in providing severe weather facilities.

### **Funding questions.**

It is unclear how values vary in different parts of the document for what seem like the same program category. For example, on page 5 the Energy efficiency and renewable component is listed as \$473.9 million. In Table 1 this value is \$397 million. I see on page 16 that some categories include several types of funding allocations, but that is a big difference and I can't see how it is calculated. Some clarity would be helpful.

The other funding area that seems to be left out of the draft CIP is funding for the PCEF staff and PCEF Committee support. Is this included in the \$750,000.000, and is it a capped percentage, or how is this managed? I believe this should be transparent, and included in the CIP.

Regarding contract and workforce equity, I appreciate the wage requirements to ensure "that workers on PCEF projects are paid at least 180% of minimum wage, or prevailing wages, where applicable." Does this provision apply to apprenticeships and pre-apprenticeship program participants as well? I don't know if that is appropriate and realistic.

### **Portland Clean Energy Fund Website.**

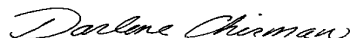
I encourage you to expand the PCEF website to include a section on available services to members of the public. A format could be developed and each grantee could fill out the information about services provided and eligibility requirements for participants. This would need to be updated with each grant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

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

### **Summary.**

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

Sincerely,



Darlene Chirman

**From:** [Helen Brodahl](#)  
**To:** [Clean Energy Fund](#)  
**Subject:** Thank you!  
**Date:** Thursday, May 18, 2023 10:59:46 PM

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Dear The Portland Clean Energy Fund,

I wanted to send this email as a thank you for all of the hard work this fund has put in to make Portland and our environment a better place. With a changing world we need to change our habits, and having funds like this put in place to help shift to clean renewable energy and create opportunities for people in clean energy positions is unbelievably important. Thank you for the time, effort, and money that this fund puts in to do so.

Thank you for working to install green infrastructure including tree canopies, bioswales, urban renewable agriculture, and community gardens. Thank you for the millions of dollars each year that are invested in communities on the frontlines of climate change. Thank you for increased solar power for homes, schools, and businesses, along with energy efficiency projects and reduced utility bills. And most of all, thank you for fighting towards a better future for ourselves and those who come after us.

Working towards a shift for clean energy is one of the most important things we can do for our environment, and doing so while involving the local community is even more important. Taking initiative and setting goals on such a large issue is extremely difficult and time consuming, something that many don't have the heart to follow through with. Thank you so much for being able to do so. Your actions give me hope for the future of our city!

Helen Brodahl



June 1, 2023

To: [cleanenergyfund@portlandoregon.gov](mailto:cleanenergyfund@portlandoregon.gov)

Re: Habitat for Humanity Portland Region Input on Climate Investment Plan

Dear Portland Clean Energy Fund,

Thank you for the opportunity to provide input on the Portland Clean Energy Community Benefits Fund (PCEF) Climate Investment Plan (CIP). We deeply appreciate the committee's thoughtful and thorough planning, and the level of community input and engagement.

As a nonprofit developer of affordable homes for sale, Habitat for Humanity Portland Region offers the suggestions below to facilitate PCEF participation by smaller programs as we face a period of impending budget constraints.

A recent study prepared by EcoNorthwest for Oregon Housing & Community Services found that between 2006 and 2021 construction costs increased 60% in our state.<sup>1</sup> Since then, we have experienced an onslaught of compounding expenses, with inflation, rising interest rates, supply chain shortages, pandemic-related delays, and labor scarcity. Interest rates, for construction financing and mortgages, are creating a particular pinch point for Habitat Portland's program. Over the past 12 months, our Habitat homebuyers have seen an interest rate increase of over 4%, which increases the subsidy our program needs to provide to keep the homes affordable for families at 35-80% AMI.

### **1. Eligibility for middle-housing homeownership programs**

Most of the homes built by Habitat for Humanity Portland Region are "middle housing" styles, such as townhomes, which are subsidized to be affordable for purchase by families who earn between 35-80% Area Median Income. Over 80% of our program's homebuyers are households of color, and 40% include a family member with a disability.

The CIP creates programs for "multifamily" and "single-family" homes, but those terms are not defined. Therefore, it's not clear where middle housing (or specifically, regulated affordable

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<sup>1</sup> Oregon System Development Charges Study: Why SDCs Matter and How They Affect Housing (December 2022), available at: [https://www.oregon.gov/ohcs/development/Documents/Oregon%20SDC%20Study\\_FinalReport\\_121422.pdf](https://www.oregon.gov/ohcs/development/Documents/Oregon%20SDC%20Study_FinalReport_121422.pdf)

middle housing for sale) fits. House Bill 2001, at the state level, and Portland's Residential Infill Project (RIP and RIP2) have recognized the importance of duplexes, fourplexes, six-plexes, cottage clusters, and townhomes as a key strategy to reach our housing production, density, and affordability goals. Middle housing supports PCEF's purposes:

- By tucking housing into underutilized urban lots, we maximize existing infrastructure, promote ecological forms of transportation, save time and money by living near work, services, and schools, and preserve the forests and farmland outside the urban growth boundary.
- Middle housing can create affordable homeownership opportunities for families who have been closed out of the private market, primarily BIPOC families, who own homes at roughly half the rate of white Portlanders.

Skyrocketing housing costs are integrally tied to wealth, health, and climate-impact disparities. Majority white homeowners have reaped a windfall in equity growth over the past few decades, while BIPOC households and younger families have scrambled to keep up with rising rents and have been almost entirely closed out of homeownership. Black Portlanders own homes at half the rate of white Portlanders, and this gap is worsening. BIPOC homeownership has suffered from redlining and urban renewal, and more recently, predatory lending, displacement and gentrification, and the inequitable economic fallout of the pandemic. Compounding those factors, rising interest rates and inflation means that [half as many Black Americans](#) can afford home ownership today as could in 2021.

Affordable middle housing is a critical climate and equity strategy. Clean energy in new, affordable, middle-housing homes for sale should be a priority for PCEF funds and should be clearly addressed in a PCEF strategic program.

## **2. Contractor and Workforce Equity Goals**

While Habitat Portland Region is strongly invested in cultivating a diverse pipeline of trades workers and supporting minority and women-owned businesses, the targets set in the CIP pose practical challenges.

### **Proposed requirements in the CIP:**

Contractor diversity goals are triggered under the CIP for all PCEF allocations of \$350,000 or more. MWESB businesses must account for 30% hard costs, 20% soft costs, and 25% professional services.

On most projects, 30% of hours worked, by trade, must be worked by apprentices. Further requirements state that 15% of apprentice hours must be worked by women and 30% of apprentice hours must be worked by people of color.

### **Challenges posed by the apprenticeship targets:**

Habitat for Humanity Portland Region has a longstanding commitment to supporting a diverse pipeline of trades workers. We enjoy a 20-year partnership with Portland YouthBuild, a construction training program for youth completing their high-school degree.

Despite our strong interest in supporting apprenticeship programs, the targets set in the CIP will be challenging. Large projects, with hundreds of hours of labor by various trades, are much better equipped to incorporate apprentices in all trades and to track apprentice hours and demographics. In contrast, a 4-plex may include a handful of hours by various trades: plumbing, electrical, drywall, flooring, insulation, HVAC, painting, finish carpentry, framing. Incorporating apprentice hours for each separate trade, and disaggregating hours worked according to the gender and race/ethnicity of the apprentice, quickly becomes a highly complicated puzzle. For example, if the HVAC crew spent 30 hours on the project, 10 would need to be worked by any apprentice, including 3 hours by an apprentice of color and 90 minutes by a woman apprentice, and so on across the trades.

Furthermore, we often contract with small companies that don't operate at the scale required to handle the logistics and cost of an apprenticeship program.

We strongly recommend that apprenticeship requirements apply only to larger developments, such as 50 or more units.

### **Challenges posed by the MWESB targets:**

At Habitat Portland Region, we are continually striving to expand our pool of MWESB partners (both COBID and non-COBID certified) and reassessing our strategies to increase MWESB participation. Depending on the project, we have achieved between 13-46% in hard costs paid to MWESB/COBID contractors.

Our procurement policy includes affirmative steps to assure that MWESB businesses are utilized wherever possible for supplies, equipment, construction, and services. Affirmative steps include dividing total requirements into smaller chapters and adjusting timelines to permit maximum participation. We rely on the COBID online directory and our own in-house directory, but we are also actively engaged in outreach through the Oregon Association of Minority Entrepreneurs, Latino Built, and Partners for Diversity, an affiliate of the Portland Business Alliance Charitable Institute. Women and people of color occupy leadership roles throughout our inhouse Construction Department including our Vice President of Construction, Director of Project Development, and Director of Construction.

Nevertheless, it is challenging for smaller projects such as ours to compete to attract MWESB businesses, which are in high demand. Many MWESB firms specialize in more lucrative, larger scale (commercial or large, publicly funded residential) projects. The process for obtaining COBID certification is laborious, and a deterrent to smaller companies that don't specialize in government funded projects. In total, it is particularly challenging to attract MWESB businesses

which are large enough to support an apprenticeship program, creating a practical tension between these two goals.

### **3. Request for no minimum number of units to trigger PCEF eligibility**

While not specifically stated in the CIP, we have heard mention of a minimum number of units required to qualify for the PCEF multifamily affordable housing program. For the reasons stated above, we strongly believe that small middle-housing projects should be eligible. The combination of RIP2 zoning code changes and PCEF funds could be a powerful tool to allow BIPOC households to purchase an affordable, energy efficient home. Smaller developments (e.g. 4-plexes) can tuck into higher-density, amenity-rich neighborhoods. Bringing energy efficiency to small infill projects is a climate-friendly and community-centered strategy squarely within PCEF's stated goals.

Thank you for your consideration and service,

A handwritten signature in black ink, appearing to read 'S. Radcliffe', is displayed on a light gray rectangular background.

Sarah Radcliffe  
Director of Government Relations  
Habitat for Humanity Portland Region

**From:** [Judy Ringenson](#)  
**To:** [Clean Energy Fund](#)  
**Subject:** Comments on Climate Investment Plan  
**Date:** Thursday, May 25, 2023 6:11:56 PM

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I wish to applaud you on the Climate Investment Plan: It covers so many vital areas in very important detail.

I am very happy about your efforts to increase the tree canopy and to provide electric vehicles and to mobilize citizens that are suffering the most due to climate change. Their residences need urgent improvement. Recruiting youth to regenerative agriculture projects is so important.

Unfortunately, the people who should be most involved in the many steps of the many goals have difficulty engaging in the efforts while needing to work long hours in poorly paying jobs. Could some of the funds offered be used to compensate them for lost hours of work?

I have been impressed by the energy and hopefulness of those who have so far been engaged. Far more need to be.

Thanking you for your great efforts and scope of planning,  
Judy Ringenson

Portland Clean Energy Fund  
Bureau of Planning & Sustainability  
1810 SW 5th Ave, Suite 710  
Portland, OR 97201

May 23, 2023

Dear PCEF Committee & Staff,

As elected Board Directors for School or Educational Districts in Portland we are submitting the following comments on the Draft PCEF Climate Investment Plan. We applaud PCEF in creating a strategic fund of \$50 million for “Climate Friendly Schools.” This is a worthy and timely investment to make our school hubs for present and future climate mitigation, adaptation and resilience. We particularly support PCEF’s intention to fund “youth-driven projects for this strategic focus” mentioned in the March 2023 draft.

Our primary feedback on the draft CIP is to urge PCEF to specifically identify participatory budgeting (PB) as a mechanism or pathway for funding projects. Tapping students through PB to identify and select climate mitigation and adaptation projects is particularly opportune given the rapid growth in school-based PB around the country. Portland could learn from and build on successes in New York City, Phoenix and elsewhere. In addition the knowledge and expertise East Portland youth are currently developing through the Youth Voice Youth Vote PB project means we already have youth of color positioned to lead in implementing PB in schools. Some student and District leaders are already investigating PB as a model for project-based learning that enlists students to improve their learning environments while building trust in and ownership of their schools. Lastly, PCEF could benefit from the process and products of school-based PB to inform future investments while demonstrating its commitment to transparency, accountability, and innovation in the use of public resources.



Thank you for your consideration of this request. We sincerely hope PCEF explicitly incorporates participatory budgeting into the final Climate Investment Plan.

Sincerely,

**Danny Cage**

Board Director *Elect*,  
Multnomah Educational  
Service District

**Michelle DePass**

Board Director,  
Portland Public School  
District

**Heather Franklin**

Board Director,  
David Douglas School  
District

**Gabriela Saldana-Lopez**

Vice Chair  
Board Director,  
David Douglas School  
District

**Katrina Doughty**

Vice Chair  
Board Director, Multnomah  
Educational Service District

**Stephanie Stephens**

Board Director,  
David Douglas School  
District

**Hoa Nguyen**

Board Director,  
David Douglas School  
District

**Aaron Barrows**

Board Director,  
David Douglas School District

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Board Director,  
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Board Director,  
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Board Director *Elect*,  
Multnomah Educational  
Service District



[www.pboregon.org](http://www.pboregon.org)

Portland Clean Energy Fund  
Bureau of Planning & Sustainability  
1810 SW 5th Ave, Suite 710, Portland, OR 97201

May 15, 2023

Dear PCEF Committee & Staff,

Participatory Budgeting Oregon submits the following comments on the Draft Portland Climate Investment Plan (CIP). We generally support the plan and the broad allocations to transportation, green infrastructure, regenerative agriculture, energy efficiency, climate-related workforce development and schools. Our primary comment relates to the process of allocating funds and the lack of any explicit mention of participatory budgeting (PB) as a mechanism. PB is a democratic process in which ordinary residents allocate- within parameters- a portion of a public budget by a binding vote. For the following reasons, we think PB should be explicitly mentioned as a fourth “funding pathway” on page 7 and 8:

1. Transparency & Accountability: PCEF has been challenged by critics to allocate available funding with sufficient public accountability and transparency. What better way to demonstrate transparency and accountability than to delegate power, within parameters, directly to the communities served? PB is a highly flexible, proven mechanism for increasing transparency, accountability, and public trust over the use of public funds. It will directly operationalize PCEF’s Guiding Principles: Accountable and Community-Powered.
2. Tapping Lived-Experience: Portlanders in general, and frontline communities in particular, have enormous untapped collective knowledge and lived-experience that can and should inform and direct the public investments made on their behalf. PB has spread rapidly around the world and across the US because it is a proven model to operationalize this principle.
3. Data to Guide Broader Investments: PB has been employed around the world to identify strategies to mitigate and adapt to climate change. PB can serve as a thermometer to identify real time needs of communities or as a “barometer” to detect and anticipate the location, timing and severity of the effects of climate change.<sup>1</sup> The funding decisions made by diverse, underrepresented communities through PB can inform broader PCEF investment decisions.

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<sup>1</sup> Cabannes, Yves. 2021, “[Contributions of participatory budgeting to climate change adaptation and mitigation: current local practices across the world and lessons from the field.](#)” *Environment and Urbanization* 33(2).

4. Community & Civic Leadership Building: PB is a proven mechanism for fostering positive relationships and coalitions between residents and with public officials around public works. These impacts build civic leadership and increase civic participation in other channels, including voting in elections. PB can deepen and broaden participation in all PCEF programs.

We believe the CIP should also explicitly identify PB as a mechanism for allocating the \$50 million to “Climate Friendly Schools” strategic program that PCEF anticipates will include “youth-driven projects.” What will this mean? Will this put youth directly in the driver seat of shaping and selecting projects? For the following reasons, we believe this strategic focus of the CIP is a particularly rich opportunity to begin allocating PCEF funds through PB:

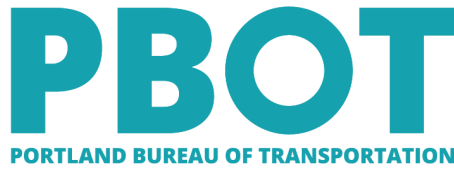
1. Rapid Growth of School-based PB: PB in schools is rapidly developing around the US and the world. Case studies and ongoing initiatives in New York City, Phoenix, Seattle, Rhode Island, and beyond could inform implementation of school-based PB in Portland.
2. Racial Equity: Youth and school-based PB provides a targeted universalist strategy that centers Black, Brown, and Indigenous people who represent a higher percentage- and in East Portland a majority- of the population under 18 years of age.
3. Youth Voice, Youth Vote PB in East Portland: Youth Voice Youth Vote (YV<sup>2</sup>) PB has engaged hundreds of East Portland youth in designing and implementing Oregon’s first PB process. Through YV<sup>2</sup> PB, 13 to 25 year olds are developing projects and voting on how to allocate \$500,000 in COVID recovery projects in Senate Districts 24 and 25. Among other things, YV<sup>2</sup> PB has built a cohort of predominantly youth of color who are experts in PB design and implementation.
4. Ongoing school-based PB conversations: Students and Board Directors in both Portland Public School District and in David Douglas School District are already exploring school-based PB projects.

Thank you for your consideration. We are available to answer questions and provide more information to help PCEF include participatory budgeting in the Final Climate Investment Plan.

Sincerely,



Blanca Gaytan Farfan  
Policy & Communications Director



1120 SW Fifth Ave, Suite 1331, Portland OR 97204

Phone: 503-823-4000 [Portland.gov/Transportation](http://Portland.gov/Transportation)

**Mingus Mapps** Commissioner **Tara Wasiak** Interim Director

TO: Bureau of Planning and Sustainability leadership  
Portland Clean Energy Community Benefits Fund (PCEF) Committee

FROM: Tara Wasiak, Interim Director

DATE: June 2, 2023

RE: PCEF Climate Investment Plan Comments

Thank you for the opportunity to comment on the PCEF Climate Investment Plan full draft. Commissioner Mapps requested that Portland Bureau of Transportation (PBOT) offer additional comments about the PCEF Climate Investment Plan as it relates to decarbonization of the transportation sector.

As you know, the transportation sector contributes over 40% of the City of Portland's carbon emissions. The City cannot accomplish our carbon reduction and equity goals without dramatic greenhouse gas reductions from the transportation sector and PCEF represents a transformational opportunity. The PCEF Climate Investment Plan draft outlines smart, equitable transportation investments informed by community feedback. PBOT supports the proposed strategic investments in the Transportation Wallet, e-bike rebates and electric vehicle incentives. However, community partners consistently tell PBOT that people need a safe and well-maintained transportation system. People will not ride their new e-bikes without a safe system upon which to ride; transit passes or BIKETOWN passes in the transportation wallets will be much harder to use if people don't have safe crossings to walk to busses or BIKETOWN stations. This foundational transportation system is currently in peril in Portland, largely because transportation funding relies on an outdated and broken model that is dependent on people using fossil fuels and parking to fund the system.

As has been discussed recently at City Council, PBOT is about to begin the fifth year of transportation service reductions and is facing catastrophic cuts in FY 24-25. This will impact core services as well as functions that will improve the system to make it safer, more equitable and more climate friendly. Allowing PBOT to cut critical services threatens the City's ability to develop and maintain the safe transportation system that is required by community. It also threatens to undermine the proposed PCEF investments and goals. Based on these current financial challenges, we are requesting that BPS consider PCEF investments to restore and maintain PBOT services that are becoming financially unsustainable. An investment of approximately \$35 million would be less than 5% of the five-year PCEF budget, yet it could make a meaningful investment towards stabilizing the critical services offered by the transportation bureau. This could help to ensure E-bike users, transportation wallet recipients and EVs have a functional transportation system to use and that PBOT



It is the policy of the City of Portland that no person shall be excluded from participation in, denied the benefits of, or be subjected to discrimination in any city program, service, or activity on the grounds of race, color, national origin, disability, or other protected class status. Adhering to Civil Rights Title VI and ADA Title II civil rights laws, the City of Portland ensures meaningful access to City programs, services, and activities by reasonably providing: translation and interpretation, modifications, accommodations, alternative formats, and auxiliary aids and services. To request these services, contact the Portland Bureau of Transportation at 311 (503-823-4000), for Relay Service & TTY: 711.

stays on track to benefit frontline communities and support the city's carbon reduction goals. Specific PBOT funding areas could include:

- \$1.5 million per year to prepare for and leverage millions more in federal grants to make streets safer, more equitable and more sustainable. Historical levels of federal funding is available through the Bipartisan Infrastructure Law and the Inflation Reduction Act and PBOT has a track record of success with these funds. However, with PBOT's current funding situation we may no longer be able to apply for these grants, resulting in fewer benefits to frontline communities and less GHG reductions.
- \$2.5 million per year for building small capital projects and maintaining safety, transit and active transportation infrastructure. These cost-efficient investments increase safety for people walking, biking, and rolling, providing climate benefits as more and more people use non-auto modes. These small investment funds also allow us to make smart investments as part of larger maintenance projects. These projects are identified through planning processes with community input or from direct community requests, including engagement with frontline communities.
- \$1 million per year for active transportation education and programming. PBOT programs such as Safe Routes to School, Sunday Parkways and other multimodal programs help people make non-auto trips and learn to navigate the transportation system in a safe and confident way and PBOT already applies an equity lens (e.g., Title 1 Schools, East Portland focus) to its programming to maximize benefit for under-resourced communities.
- \$2 to \$4 million per year for Streetcar operations and streetcar replacements. The streetcar system provides safe, equitable, zero-emission transit service to a broad cross-section of Portlanders. Supporting transit was elevated as a priority during PCEF's Decarbonization Roundtable meetings. Streetcar riders identify disproportionately as non-white and 35% of riders report earning \$30,000 or less annually; 39% of Portland's affordable housing are within one-quarter mile of a Streetcar line.
- \$500,000 for transit signal operations and equipment upgrades to support and improve bus speed and reliability to help increase transit ridership. Increasing transit ridership and using smart signal technology are both regionally identified carbon reduction tools.

PBOT is facing an unprecedented funding crisis at a time when we are also facing dramatic declines in people riding bikes and taking transit and Portland is also experiencing historic levels of injury and death on our roads. It is imperative that we reverse these trends and doing so will not be possible without the stabilization of key transportation safety and climate investments. We appreciate your consideration and look forward to further conversations.

Sincerely,



Tara Wasiak, Interim Director  
Portland Bureau of Transportation



MEMORANDUM

DATE: June 2, 2023

TO: Portland Clean Energy Fund staff

FROM: Laura Lehman, Senior Environmental Planner

SUBJECT: Full Draft Climate Investment Plan Feedback



Thank you for the opportunity to comment on the full draft of the Portland Clean Energy Community Benefits Fund (PCEF) Climate Investment Plan. Portland Parks and Recreation (PP&R) has reviewed the document and submits the following comments for your consideration. Please reach out to Laura Lehman ([laura.lehman@portlandoregon.gov](mailto:laura.lehman@portlandoregon.gov), 971-930-0104) if there are follow-up questions or additional explanation would be helpful.

1. Strategic Program 5: Strategic Program 5, Building Upgrades for Community Severe Weather Response, should be funded for more than the proposed \$30M. PP&R community centers are used as resiliency centers in every type of extreme weather event (smoke/heat/cold) to shelter houseless people and people in need of relief from those events. Community centers including Mt. Scott Community Center, Southwest Community Center, the Multnomah Arts Center, East Portland Community Center, Charles Jordan Community Center, and Peninsula Park Community Center are all in need of HVAC and other upgrades such backup power and seismic improvements to ensure they can be safely used by the community under all conditions when a weather event might occur.

The Mt. Scott Community Center renovation is currently in progress, and provides an opportunity for to incorporate severe weather improvements into the project scope that are not currently funded. Additional funding for this project would result in improvements that are truly additive. PP&R is in

**Administration**

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**PORTLANDPARKS.ORG**  
Commissioner Dan Ryan  
Director Adena Long



process of scoping those potential additions and will provide additional information to PCEF staff when that scoping has been completed.

2. Strategic Program 12: Like Strategic Program 12, Street Tree Expansion, which provides funding support for street tree expansion specific to the 82nd Avenue corridor, PCEF funding should also support the large tree median effort of the Portland Bureau of Transportation (PBOT) and PP&R which will help create a low carbon, equitable 122nd Avenue. This project will also provide street tree canopy in an area of low canopy coverage in East Portland and create a visible and lasting positive impact on that community.
3. Transportation decarbonization: The transportation decarbonization funding category should include support for installation of electric vehicle charging stations at parks (especially regional destination parks such as Washington Park) in order to provide access to charging infrastructure in places where Portlanders gather. PP&R is working to provide charging stations at PP&R maintenance facilities at this time and hopes to build capacity to provide public charging opportunities before the end of the CIP timeframe.
4. Regenerative agriculture: For the regenerative agriculture funding category, public agencies should be eligible to apply for community responsive grants as well as the funding available under Strategic Program 9. PP&R sees potential to create a project to build community gardens with community partners if public agencies were eligible for this funding source. This would be consistent with the climate and equity framework established by PCEF because PP&R has

expertise in building community garden spaces and can use that expertise to serve frontline communities.

5. Tree canopy maintenance reserve: Consider aligning requirements for eligibility with requirements for financial assistance from the Portland Water Bureau's (PWB) financial assistance program (<https://www.portland.gov/water/water-financial-assistance/financial-assistance>). This city program uses 60% AMI. PP&R currently works with this program to provide financial assistance for permitting fees for residents who qualify. Consistency will allow PP&R to continue to work with PWB to qualify residents, reducing administrative costs and promoting consistent messaging around low income financial assistance. Note that the Bureau of Environmental Services also uses the program to determine financial assistance.
6. Tree canopy maintenance reserve: Consider including language that allows the program to adjust eligibility requirements as needed if there are not enough eligible property owners utilizing the fund.
7. Tree canopy maintenance reserve: Consider removing the cost share option which requires that homeowners with incomes of 81-120% AMI pay 50% of pruning costs. Cost share is too difficult to administer and this will result in increased program costs with little additional benefit to property owners. PP&R anticipates this program will utilize contracts with tree care companies that include PCEF requirements for minimum wages. This may result in a higher per tree cost than what is available in the general market, so a cost share would not result in savings for an individual property owner. It is also challenging to administer.
8. Tree canopy maintenance reserve: Consider including language that would allow the program to cover some costs for wood repurposing. Encouraging wood waste reuse from tree removals would allow additional carbon capture.
9. General comment: Public agencies should be eligible to apply for community responsive grants under the green infrastructure funding area. The community gardens program within PP&R is engaged in ongoing work with the Native American Community that is not always about agriculture, but that could be supported by this funding source.
10. General comment: It would be helpful for the Climate Investment Plan to include an explanation of the decision process as to why some categories are public-agency ineligible/eligible/lead. What criteria were used in making those



determinations? This information would likely be of interest to both public agencies and community organizations. The document currently does a great job outlining the steps in the CIP Development Approach, but not rationale for this decision specifically.



**Date: May 30, 2020**

**From: Bob Sallinger, Conservation Director, Willamette Riverkeeper**

**To: City of Portland Clean Energy Fund**

**Re: City of Portland Draft Clean Energy Fund Investment Plan (May 2023 Draft)**

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

We appreciate the work that has gone into this plan and the significant improvements that have been made since the April 2023 Draft. However, we continue to have significant concerns with it as currently drafted. We would offer the following recommendations to improve the plan:

1. **The Green Infrastructure Section remains largely unimproved in this draft, It should be much stronger and integrate a broad range of green infrastructure strategies:** Green infrastructure has historically been under emphasized in City of Portland's climate strategies. This is unfortunate because green infrastructure presents critically important strategies for sequestering carbon, advancing climate justice, creating more climate resilient landscapes, and achieving multiple other community benefits. We believe that the 10%-15% of PCEF allocated to green infrastructure and regenerative agriculture combined was far too small, but even within the confines of these limitations, we believe that the Investment Plan could be much more robust. We would make the following suggestions
  - a. \$5 million out of an anticipated \$750,000,000 (0.06%) is far too small of a funding allocation catchall for all green infrastructure strategies outside of tree canopy and regenerative agriculture. We would recommend significant funding resources

be designated for green roofs, green streets and most notable habitat acquisition and restoration.

- b. **We specifically recommend that the City include habitat mitigation banks as eligible for funding.** Habitat mitigation banks would allow the city to acquire and restore natural sites that could sequester carbon, provide landscape resilience (for example floodplains, wetlands and other high hazard areas) and allow the city to recapture and reinvest spent funds through the selling of mitigation credits.
  - c. The tree related strategies could be significantly improved. First, while trees are a critical element of green infrastructure, they appear to be overemphasized in this plan relative to other green infrastructure strategies. We recommend more evenly distributing green infrastructure funding over a broader array of strategies. Second, we believe the tree maintenance fund could be more effectively allocated. As currently proposed a limited subset of residents could access funding to retain subsidized tree maintenance and pruning services. This appears to us to be a potentially very expensive way to achieve limited public benefits. We believe climate, natural resource and equity goals would be more effectively and efficiently achieved by investing in a comprehensive urban tree maintenance program that strategically prioritizes underserved areas of the city. While subsidizing tree maintenance on a property-by-property basis may give a veneer of equity, a comprehensive tree maintenance program would more effectively and efficiently improve the health of the canopy on a block-by-block neighborhood basis and thus the overall ecological, climate and environmental justice benefits. Third, the tree planting goals need significantly more detail in terms of what kinds of trees will be planted, how projects will be prioritized from a carbon sequestration, environmental justice and climate resilience perspective. Finally, we would also note that we are surprised that \$40,000,000 only gets the city 15,000-25,000 trees. Even at the high end of the tree planting spectrum, this amounts to \$1,600/ tree. We understand the tree aspect of the plan is not currently open for comment but we would nonetheless, urge the City to continue to work on this plan element.
2. **The Plan needs to do a better job still feels like a hodgepodge of activities that may or may not move the needle on the City's climate goals:** We appreciate the crosswalk that the current draft does with the City's Climate Emergency Work Plan (see Table 1). We think it would also benefit from a crosswalk with the City's Climate Action Plan. Regardless, the crosswalk feels more like a cursory, retroactive referencing of the Climate Emergency Plan as opposed to real strategic use of the Climate Plans to inform priorities. There continues to be no real sense that the PCEF Plan actively used the City's extensive prior work on climate and related topics to inform priorities and strategies. It continues to feel largely like a de novo approach to climate. In doing so, we continue to feel that the plan misses significant opportunities to synchronize efforts and maximize impacts. We continue to recommend a much more robust integration of PCEF with the City's climate plans and programs and much more robust analysis of the degree

to which the PCEF plan will help meet specific targets in these plans. Ultimately, we continue to have significant reservations that the PCEF Plan as a whole could result in a series of isolated, fragmented actions that fail to achieve meaningful climate action worthy of a \$750 million investment.

3. **The Plan continues to need stronger accountability measures to ensure that all investments meaningfully advance carbon sequestration and emission reduction goals.** We appreciate the increased specificity in the current draft especially regarding the anticipated MT of carbon expected to be sequestered by each of the approaches outlined in the plan. We also appreciate inclusion of the new section regarding accountability. Finally, we appreciate the commitment to annual reporting.

However, as currently written we continue to have concerns that mechanisms outlined in the plan are adequate to ensure that projects have a significant nexus with advancing the city's climate agenda, evaluate the efficacy and impact of those projects over time and adaptively manage the program as it advances. We would appreciate inclusion in the plan of more specificity regarding how projects will be evaluated in both the selection and implementation phases. Specifically, we would recommend a commitment to utilizing reviewers with scientific and technical expertise in climate strategies on review, selection and evaluation phases. By this we mean, including people who are truly able to analyze the efficacy and viability of a project.

We also remain concerned in particular about the Fair and Flexible Capital Strategy in particular. While we are pleased to see this strategy reduced from \$105 million to \$65 million, we remained concerned that moving funds through third party financial institutions will significantly reduce that accountability, transparency and efficacy of the program. While we recognize and appreciate the need to overcome institutional barriers to engage historically marginalized communities, this represents a transfer of a significant percentage of PCEF funds over a five-year period to institutions with minimal or no expertise or prioritization related to selecting projects to meaningfully addressing climate change. We are not convinced that this is a necessary or appropriate strategy for advancing public funds. We would also note that this strategy is the most amorphous by far among the strategies outlined in the plan in terms of what it is actually supposed to substantively accomplish.

It is essential that the public, which overwhelmingly supported PCEF at the ballot, has confidence that individual projects actually do substantively advance the climate agenda.

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

We appreciate your consideration of these comments.

Respectfully,

Bob Sallinger  
Urban Conservation Director  
Willamette Riverkeeper  
(503) 380-9728  
[bob@willametteriverkeeper.org](mailto:bob@willametteriverkeeper.org)

## Clean Energy Fund

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**From:** aida k  
**Sent:** Saturday, June 3, 2023 3:00 AM  
**To:** Clean Energy Fund  
**Subject:** Climate Energy Action Plans, Critical BIPOC/Under-served Community Resources and Services

FYI,

I started the following comments on June 2. I hope they will be included with the survey. The following is a list of Climate Energy Action, Social/Environmental Justice, Economic Prosperity initiatives and critical Energy resource/services (not all inclusive), needed for the BIPOC under-served, and BIPOC Working Class communities.

### **The Original BIPOC Climate Action Plan:**

Social justice is the first goal to right the wrongs of the BIPOC community needs with the Climate Action/Energy Plan. The BIPOC communities must lead their own efforts, since the initial plan provided much community input, research, lived experiences and leadership. The Plan was approved by voters creating the largest funding of Energy resources ever created by the BIPOC communities. Now with the government re-organization, the local government has shifted the Plan under their control, and direction of the PCEF.

The plan must be locally controlled with the goals and priorities of the community, as history proves: there has been exacerbation of the local government and the BIPOC communities; barriers of unfair policies, regulations, limitation of funding resources and staff with non-profits serving BIPOC communities, and ongoing displacement and gentrification of under-served, BIPOC communities.

### **The Government Climate Action Plan/Strategic Goals:**

Initially the PCEF committee had limited funding, staff, poor assistance and oversight from our local government, making it difficult for the to operate. The current Climate Action Plan is rushed thru the PCEF committee to operate, a new incoming City Commissioner provides other input, new Consultants were hired, the original Climate Action Plan was changed and a new Strategic Climate Action Plan and Goals are now created, as the local government now directs the Climate Action Plan. A rushed Plan will limit and miss the opportunity of the priority resources and services decided by BIPOC communities. Limited engagement and missed priority decisions led by local government creates further exacerbation of the BIPOC community feeling ignored.

As BIPOC communities are still impacted and recovering from the after effects of the Pandemic, and other ongoing crisis impacts including: environmental disasters of fires, wind, earthquake, heat and cold climates; currently the economic inflation, short staff and supplies, coupled with continued job, food, rent and housing losses; new crisis including inflation, Hate crimes, increased gang violence, more lethal

drugs, increased behavioral health and medical issues; the increased violence; destruction of businesses, blocked legislation, lack of resources and a possible recession. Little Engagement with non-profits, with high staff turn over, limited resources and target specific communities, misses the opportunity for better sustainable BIPOC communities. The PCEF committee/BIPOC community can request if assistance is needed from local government, just as they decided to put the plan on the ballot for a vote. History has shown, BIPOC communities continue to suffer, lack resources and services due to systemic systems and unfair policies. The Black Lives and Lived Experiences DO MATTER. The BIPOC communities pulled thru the Pandemic for under-served communities, delivering resources, better results and services, while local governments exacerbation of the community, missed critical services and resources for BIPOC and under-served communities who died and are still dying as government leaders waste critical time, to tie up critical funding and fight over how and where to use resources thru Consultants or hand picked committees making decisions for Priority communities. For the BIPOC communities, knowing and serving the needs of their communities, when given adequate support, funding, fair policies and regulations that don't discriminate, will achieve better results. Unfortunately limited funds and resources are provided to Priority communities thru local governments with systemic policy and regulation barriers and lack of transparency, when critical, timely services and resources are needed for BIPOC communities while who suffer or die.

No one culture should speak for all, they each have different needs and services, although similar impacted issues with social determinants of health and economic impacts. The Plan must NOT incorporate the same continued barriers to resources already seen thru data collected of who local government services and resources are benefiting. Fast track government strategies and spending on Consultants only dismiss community efforts to provide results for their community as seen thru the Pandemic. Funds not going directly to the BIPOC communities, and going through other hands, will only water down the resources and create more barriers to communities receiving those resources. Rushing and limiting adequate communication and engagement of BIPOC communities; while working with small businesses with restricted contracts with local governments, limited resources, has limited the much needed input of other Working Class BIPOC communities, with lived experiences from receiving resources.

**Critical Needs/Goals for BIPOC Community - Climate Energy Justice, Social/Environmental Justice and Economic Prosperity Justice:**

Climate Justice, Social/Environmental Determinants of Health, Disaster Preparedness and Economic Prosperity are essential Resource and Services needed for a sustainable BIPOC community including:

**Affordable Climate Energy Justice:**

Develop a Green job career and training center for BIPOC under-served community. Provide BIPOC and under-served communities authority for choice of efficient resources, consultants, effective decisions, strategies, action plans, goals, targets, timelines and adequate staff; allow BIPOC to create fair and effective policies, regulations, best practices, programs,

incentives, rebates, energy product choices, effective strategies, actions, goals, targets and timelines of Climate Energy Justice for BIPOC and under-served communities. Provide the BIPOC community the opportunity of Energy choices, energy efficiencies, products of choice including appliances, windows, lighting, solar energy, green spaces, square footage, input in development of the affordable units design, heating and cooling units, housing security, farmers market or healthy cultural food choices, cultural services, green services for youth, seniors and disabled, units free of crime, harassment or discrimination, clean air, safe elevator operations and energy outages with affordable energy efficient generators for senior and disabled, green mobile health units and affordable green technology and devices and education, exercise, art, clean water, and other Energy choices of their choosing; fair and equitable energy policies, practices lived experiences and effective communication with Energy partners, engagement, delivery of adequate services and resources, adequate energy efficient choices in green green energy career fields of choice from energy partners to meet the needs of the BIPOC and under-served communities, increased input of the BIPOC community with affordable utility rate increases, adequate partner goals, targets and results to meet community needs of the community vs partners deciding what the community will receive.

**Fair Affordable Housing/Environmental Justice:**

Conducive to BIPOC Median Income levels, adjusted with inflation, recession, disasters and crisis. Increasing working relationships with new culturally competent partners, with lived experiences, programs and practices, to meet the needs of the BIPOC communities; provide better oversight of non-profit contracts, goals, targets and results achieved for the BIPOC communities, including communication and engagement, community surveys, programs practices and data, to prove targets met and services adequately delivered to meet community choices of services and resources vs partners making community decisions and choices of their products and services;

Increase adequate rental vouchers, subsidies, and incentives with partners with lived experiences of communities served; provide adequate resources and support to developing fair housing units and homes of communities choice, in unpolluted areas or near freeways, free of hate crimes and violence or gangs; choices of the following services: adequate jobs, wages and transportation of choice, safe environments, green spaces, adequate doors, windows, paint, and development of safe units adequately inspected and free of defects, clean air filtration, adequate healthy cultural food and living area square footage, computer rooms and education, adequate parking spaces; adequate fair and equitable practices and resident rights and services; religious fair minority developer fees and support, resources, incentives and costs associated with inflation, recession, disasters, etc. to build affordable housing, adequate, safe, equitable practices and wages of staff working in units and adequate equitable maintenance services, increased involvement of community choice and engagement of resources conducive to the needs and of the choices of the BIPOC community units, services, and resources needed vs where and



what the partners or local government doesn't provide except displacement and gentrification.

**Economic Prosperity Justice:**

Increase fair and equitable wage partner jobs, trades, apprenticeships and small business education, resources, training opportunities will assist the BIPOC communities from shifting jobs, due to economic inflation, short staff, shifting jobs due to low wages, poor unsafe working conditions, employee rights and benefits.

Increase culturally competent partners funding of grants or other affordable loans, providing alternative resources and choices of funding for BIPOC and under-served communities; Reduce and Stop unfair over taxation, product and service pricing of local government and partner services for BIPOC and under-served communities; increase housing development choices for increased purchases of homes and green jobs, open TIF districts to be larger and more inclusive of communities, offer adequate staffing for affordable green, innovative housing development and offering better grants and resources for housing rehabilitation of multi-family home owners struggling to keep from losing their homes thru foreclosures, increase limited PCEF resources to repair a larger increase of homes that could help meet the demands of shared homes, offer better resources for BIPOC families who have lost their homes to local government; provide better support with increasing relationships with new or existing community partner programs and thru equitable, fair lending of affording services. Increase new programs with the Joint office of Homelessness, removing barriers for increase BIPOC involvement, staff positions, engagement, lived experiences and paid opportunities to serve on committees or be hired with adequate wages to work with developing green infrastructure for homeless and working in higher management positions.

Increase Energy green jobs that provides support services, education assistance, career ladders child care, pensions adequate medical and employee protections, careers that are marketable and sustainable in Portland or other near areas where adequate wages and transportation are appropriate and competitive as other employees in other Districts with higher wagers; provide innovative green career partners, culturally competent or willing to be trained, have best practices and resources including but not limited to: Energy Renewables, Environmental services, Construction, Environmental Social Justice, Energy communications, Energy Finance, Government Affairs and Data Analysis, Energy Products, Energy Scheduling, Medical, Energy Marketing, Sports, Manufacturing, Public Policy, Tourism and Transportation. Increase working relationships with new culturally competent partners or willing to be trained in recruiting, hiring, training, or educational funding opportunities.

Increase career development partner opportunities, higher level jobs (not in the service industry), including Management, Supervisory, Program managers and other high wage positions. Meet the targets and goals of recruiting and hiring BIPOC and under-served with high wage careers, increase resources with non-profits able to hire with higher wages to

retain staff, increased benefits and resources with partners to provide better benefits to the BIPOC and under-served, such as child care, employee security and safety, unions, better pensions, education, quality health care, affordable housing assistance etc. Meet the needs of the BIPOC communities career interests and wages, to meet the needs of the BIPOC and under-served communities sustainability.

Thank You

## Clean Energy Fund

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**From:** Thomas Karwaki  
**Sent:** Friday, June 2, 2023 3:43 PM  
**To:** Clean Energy Fund  
**Subject:** UPNA Comments on Climate Investment Plan

The board of the University Park Neighborhood Association supports the CIP particularly the housing and transportation elements:

SP 1,2,3,and 4 (housing)

SP 6 - Electric bike

Tree canopy maintenance reserve.

The UPNA requests that candidate projects from throughout the City should be encouraged to apply for funding, and that the funding be tracked in a manner that it can be readily reported by either neighborhood district coalitions or the new City Council districts

Thomas Karwaki  
Chair  
253.318.2075 cell/text

## Clean Energy Fund

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**From:** Coffey, Nick  
**Sent:** Friday, June 2, 2023 3:48 PM  
**To:** Clean Energy Fund  
**Subject:** Commissioner Gonzalez's Requests for PCEF Funds

1. Increase in financial support of underfunded city infrastructure susceptible to climate/seismic threats.
2. Climate/seismic improvements specific for Portland Fire training center.
3. Focus on equity in retrofitting emergency-response city properties to ensure women's restrooms.



OFFICE OF COMMISSIONER  
RENE GONZALEZ

**Nick Coffey** (he/him)  
**Policy & Administrative Specialist**  
Office of Portland City Commissioner Rene Gonzalez  
1221 SW Fourth Avenue, Suite 230  
Portland, Oregon 97204  
503-278-2942 (cell)  
[nicholas.coffey@portlandoregon.gov](mailto:nicholas.coffey@portlandoregon.gov)  
[www.portland.gov/gonzalez](http://www.portland.gov/gonzalez)

June 2, 2023

Re: Comments on Preliminary Draft Climate Investment Plan

Dear PCEF Committee members:

Thank you for the opportunity to provide feedback on the Portland Clean Energy Fund's Climate Investment Plan Preliminary Draft.

We appreciate the goals of the Climate Investment Plan to achieve major greenhouse gas reductions in ways that advance racial and social justice. These goals are in alignment with Portland Community College's Climate Action Plan and we are excited about the opportunity for the City of Portland to make broad investments to ensure the sustainability of our region. However, we feel that clarity is needed on the role of public higher education both in regards to the CIP's workforce development goals and within PCEF more broadly. We would like to see specific criteria around what workforce development entails within the CIP.

We suggest that in order to ensure PCEF is able to fully invest in community-led clean energy projects that benefit all Portlanders, funding should be included for education and training as part of your investment package in all appropriate funding streams (strategic, community responsive and green infrastructure). We would also suggest that you consider broadening your conception of workforce development beyond entry-level jobs to include career development or job retraining for people interested in changing careers or finding avenues to adopt sustainability practices into their existing work. We also ask for support for retooling existing workforce training programs to green programs, for example investing in equipment for training on green vehicles, training modules for instructors working with new refrigerants, or exploring pathways to biotech.

Lastly, we have questions around how PCC programs outside of the City of Portland can engage with the work of PCEF. As the state's largest institution of higher education, PCC serves over 50,000 students from the Portland metro region and students participate in programs across our entire college district. More clarity on the role of institutions that have facilities both in and outside of the City of Portland would help with planning around PCEF engagement.

The Climate Investment Plan could provide an amazing opportunity for robust partnerships with workforce development partners in higher education to support students from traditionally marginalized communities to enter careers in sustainability. We appreciate the ability to provide feedback on the CIP and look forward to continued engagement with PCEF.

Sincerely,

Sage Learn  
Chief of Staff and Executive Director for College Relations  
Portland Community College

## Clean Energy Fund

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**From:** Santner, Sarah  
**Sent:** Friday, June 2, 2023 4:25 PM  
**To:** Clean Energy Fund  
**Cc:** Baraso, Sam  
**Subject:** CIP comments from Portland Water

Hello PCEF staff,

Thank you for the opportunity to review and comment on the Climate Investment Plan. Below are three comments from the Portland Water Bureau. We offer a few general thoughts, and a few specific program ideas. We were not clear if this review moment was the right place to offer program specific details on implementation or dollar amounts. If you see possibility with any of the program concepts submitted, please let us know how to proceed.

Thank you for all of your work to carry this important change forward!

**Sarah Murphy Santner** (she/her/hers)

Resource Protection and Planning Director

Portland Water Bureau

Cell phone: (503) 865-6413

Email: [sarah.santner@portlandoregon.gov](mailto:sarah.santner@portlandoregon.gov)

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*The City of Portland ensures meaningful access to city programs, services, and activities to comply with Civil Rights Title VI and ADA Title II laws, and reasonably provides: translation, interpretation, modifications, accommodations, alternative formats, auxiliary aids and services. Please reply to this email or call 503-865-6413 or the Oregon Relay Service: 7-1-1 with requests or visit [Portland Water Bureau's Disability and Language Access page](#) for more information.*

### 1) Water/Energy Nexus

Comment: PWB recommends that PCEF include water efficiency as a goal to the overall energy efficiency framework. Each gallon of water used in homes and businesses in Portland requires energy to produce, heat, and treat. The energy requirements of drinking water production and wastewater treatment can often be overlooked when calculating energy efficiency benefits. We see opportunities for recognizing the energy efficiency gains throughout the existing code categories – climate jobs, energy efficiency, and regenerative agriculture specifically. This could mean as an effort to account for the energy savings associated with the water efficiency of the existing programs scoped. For example, if changing out a showerhead in a multifamily property, rather than simply accounting for the energy savings associated with the heating of the water, also account for the energy saved by using and disposing of less water. This could also mean as a specific call-out for water efficiency programs which are not currently being done. For example, with rising air temperatures, cooling infrastructure will become even more important. There are significant opportunities for cooling-related water efficiency improvements, (i.e. water cooled equipment and cooling towers) not being addressed within PWB's existing programs.

#### Background:

- “Three percent of the nation's energy is used to pump and treat water, so conserving water conserves energy that reduces greenhouse gas pollution”. – [United States Environmental Protection Agency](#)
- “If just 1 percent of American homes replaced an older toilet with a new water efficient toilet, the country would save more than 38 million kilowatt-hours of electricity— enough electricity to supply more than 43,000

households for a month.” - [Natural Resources Defense Council, \*Water Efficiency Saves Energy: Reducing Global Warming Pollution Through Water Use Strategies\*](#)

- “Sustainable water management is central to building the resilience of societies and ecosystems and to reducing carbon emissions. Everyone has a role to play – actions at the individual and household levels are vital.” – [United Nations, \*Water and Climate Change\*](#)
- The relationship between water and energy goes both ways. By saving energy, we are also saving water. “Large quantities of water are embedded in the energy we use, since water is used in the production of energy, primarily for cooling purposes.” - [Alliance for Water Efficiency, \*Water and Energy\*](#)

#### a) How does your recommendation(s) impact benefits to frontline communities and measurable ghg reductions/sequestration?

Based on a five-year average, the carbon intensity of Portland’s drinking water system is 0.000316 kg of CO<sub>2</sub>-equivalent (CO<sub>2</sub>e) emissions per gallon of water, or 0.236 kg CO<sub>2</sub>e per CCF (hundred cubic feet). Saving water directly lowers carbon emissions. Similar calculations exist for the water treatment side of the equation, but PWB was not able to collect that information as we were working on this comment. Further discussion with BES would provide a full estimate of the ghg associated with each gallon of water.

Frontline communities, specifically Portlanders living with low incomes pay a disproportionate percentage of their household income towards sewer, stormwater, and water services. Water and sewer costs are rising due to aging infrastructure, investments in future system reliability (i.e., earthquake preparedness actions, water treatment improvements, and climate change adaptive actions), and increasing regulatory mandates. Higher utility costs will affect renters, homeowners, property owners, and businesses and will have a disproportionate impact on Portlanders living with low incomes, a priority population. In Portland, reducing water use directly lowers the water and sewer volume charges and can make bills easier to manage.

#### b. How has your recommendation(s) been community-informed?

Portland has offered water efficiency programs and services since 1995. We regularly engage with community at events, through the Portland Utility Board, through partnerships with community organizations and through direct customer service. We know that the community values programs that support their ability to manage costs while saving water.

#### c. How would your recommendation(s) impact or improve accountability to PCEF priority populations?

This recommendation to add water efficiency as a goal is measurable and impactful. Accounting for the energy benefits embedded in water and wastewater, is really just fully capturing the community benefit of work already scoped. If PCEF wanted to further engage on developing additional water efficiency specific programs, each project or program could be targeted to specific priority populations and would have a set of clear performance measures.

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## 2) Water Leak Information & Repair

Comment: Portland Water Bureau recommends that PCEF include water leak information, assessment, and repair as a strategic program.

Background: Water leaks account for 13% of water consumed in an average home.<sup>[1]</sup> Leaks can have a substantial financial impact on customers both in terms of increase charges on sewer, stormwater, water bills and the cost to repair leaks. Service line breaks often require an investment of thousands of dollars for repair or replacement – a significant barrier for community members living with low incomes.

The Portland Water Bureau engages in water leak management with community households, businesses, and within the city’s distribution systems. Opportunities exist to create additional energy and water savings through investment in leak information, assessment, and repair. Below are a few examples of opportunities:



- Suggested PCEF investment in Portland Water Bureau's existing Water Leak Repair program to expand capacity to serve an additional 200 households. The program serves an average of 100 customers based on current resources, and the need for these services has outpaced current resources for several years. The 2023 waitlist has over 100 customers before the funding year has started.
- Suggested PCEF investment in a utility customer portal to notify customers rapidly about water leaks on their property. This portal does not currently exist, and PWB is scoping the function of how this new tool could best serve the community.
- Suggested PCEF investment in water loss control management within the city's water distribution system.

### How does your recommendation(s) impact benefits to frontline communities and measurable ghg reductions/sequestration?

Leaks account for 13% of all water use nationwide and are a significant financial burden for community members without the resources easily cover the cost of repairs. Repairs can easily be thousands of dollars and many customers enrolled in our bill discount program (living with low income) do not have access to the capitol to pay for repairs upfront. In extreme situations, customers are unable to access water due to the severity of their leaks. In cases like this, leaks can impact the health and safety of a household and have detrimental impacts on the property and ability of a family to stay in their home. Leaks can also have a substantial financial impact on customers in terms of increase charges on sewer, stormwater, water bills. Portland Water Bureau Water Leak Repair program customers have had underground leaks of over 4,000 gallons per day.

Based on a five-year average, the carbon intensity of Portland's drinking water system is 0.000316 kg of CO<sub>2</sub>-equivalent (CO<sub>2</sub>e) emissions per gallon of water, or 0.236 kg CO<sub>2</sub>e per CCF (hundred cubic feet). Residential customer water leaks lead to higher water bills and higher water system energy use and carbon emissions. Therefore, residential leak repair has the potential to increase water use efficiency and reduce carbon emissions. Similar calculations exist for the water treatment side of the equation, but PWB was not able to collect that information as we were working on this comment. Further discussion with BES would provide a full estimate of the ghg associated with each gallon of water.

### b. How has your recommendation(s) been community-informed?

Our recommendation to support increased effort on water leak information, assessment and repair has been informed by engagement with community in the following ways:

- All existing **Water Leak Repair Program partners**, the African Alliance for Homeownership, Community Energy Project, and Multnomah County have expressed growing need for leak repair services (both sewer and water leak repair) and funding.
- **Community organizations** who work with customers with home repair needs (i.e. several of [these organizations](#)) have also advocated for additional resources, citing long wait-times with their own programs and limited ability to focus on water-related repairs (often they are limited by grant funding scope, funding amounts or geographic area).
- Portland Water Bureau attends **community events and presents workshops** throughout the year. The focus of these workshops is how to save water and money and the audience of focus have been immigrant communities and homeowners or perspective homeowners living with low income. We present these workshops in multiple languages and the impact of leaks on bill affordability is a consistent concern.
- The Water Efficiency team engages customers through technical assistance, our conservation hotline, online water consumption portal program (customers enrolled in the bill discount program only) and more. Concerns about leaks are a primary driver for community contact with the program.
- A common concern we hear from **renters with leaks** who are not responsible for the water/sewer/stormwater bill is that their landlords will not fix leaks. There is little incentive for landlords to take care of leak situations when they are not directly responsible for the bill.

c. How would your recommendation(s) impact or improve accountability to PCEF priority populations?

This recommendation could reduce the financial impacts from leaks on priority populations. Water leak programs could be targeted to specific priority populations and would have a measurable water and energy savings. Historical disinvestment has led to deferred maintenance on older homes is an ongoing concern especially for Black homeowners (highlighted through our partnership with African American Alliance for Homeownership). Supporting leak repair and proactive water efficiency investments may have a positive impact on sustaining Black homeownership.

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### 3) Renewable and emissions-free energy at city-owned facilities

Comment: PWB recommends that PCEF consider adding a strategic program for renewable and emissions-free energy, and exploration of new renewables technology at city-owned facilities.

a. How does your recommendation(s) impact benefits to frontline communities and measurable ghg reductions/sequestration?

Increasing renewable energy generation at city-owned facilities would support the city's 100% Renewable by 2050 goal and reduce the amount fossil-fuel based electricity emissions the city consumes from the grid. City bureaus have potential to increase on-site generation of micro-hydro, solar arrays at city facilities (including Parks community centers and water facilities), and other emissions-free sources of energy, but funding is often the greatest barrier and projects are usually only possible with additional incentives (e.g. from the Energy Trust of Oregon and other sources). New renewables technologies are emerging in the as part of the clean energy transition, and PCEF funding would enable the city to pilot and test these new technologies and scale up on-site renewable generation.

PCEF funding would accelerate implementation of renewable opportunities at city facilities that can be brought online quicker than the PGE and Pacific Power grids can transition to 100% renewable by 2040. Assessment of measurable ghg reductions/sequestration would need to be assessed for each project, this comment/recommendation is simply to create the opportunity for those projects to be brought to PCEF.

Frontline communities are disproportionately impacted by the impacts of climate change, and a faster transition to a net-zero carbon footprint from the City of Portland would contribute to the much-needed and urgent GHG emissions reductions locally and globally.

b. How has your recommendation(s) been community-informed?

The City and Multnomah County's 100% Renewable by 2050 resolution was developed in partnership with stakeholders representing community organizations, environmental groups, utility companies, and environmental justice nonprofits. This resolution was focused on the acknowledgement that rapid decarbonization of the economy is required to sustain a livable climate. There is clear support from the community for renewable energy.

c. How would your recommendation(s) impact or improve accountability to PCEF priority populations?

Increasing renewable generation, emissions-free energy production, and emerging technologies would support improved accountability to priority populations, many of whom are asking for faster action on renewables, climate benefits and leadership from the city. The cost-efficiency of renewable resources will also continue to increase as we make the transition to the clean energy future, which provides long-term community benefits.

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<sup>[i]</sup> Water Research Foundation, “Residential End Uses of Water Version 2”



**Portland General Electric**  
121 SW Salmon Street • Portland, Ore. 97204

June 2, 2023

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

**SUBJ: Comments on Full Draft Climate Investment Plan**

Dear Sam,

Portland General Electric Company (PGE) appreciates the opportunity to comment on the Portland Clean Energy Fund (PCEF)'s full draft Climate Investment Plan (CIP). The transition to a clean energy future will be challenging, and we are committed to working with our customers, communities, and important partners like PCEF to create an affordable, reliable, and accessible energy system for all. We see an opportunity for coordination between PCEF and PGE on this critical work of achieving ambitious reductions in greenhouse gas emissions and advancing our shared climate objectives, including ensuring Portland's frontline communities and neighborhoods participate in and benefit from the transition.

PGE acknowledges that while adopted by popular vote, the foundation for PCEF was created by a diverse community coalition, and we fully support PCEF continuing to be community-informed and community-led. In that spirit, we provide our comments below. Working in coordination, we can maximize benefits to Portlanders. We encourage PCEF to continue to be bold in its thinking and implementation, and we respectfully offer the following comments on your full draft CIP.

Energy Efficiency and Renewable Energy

PGE fully supports PCEF's emphasis on investments in energy efficiency and renewable energy. The focus areas for the community responsive grants and five strategy programs are sound and will represent major progress in reducing building emissions, improving air quality, boosting household and business utility savings, and creating more resilient communities.

Energy efficiency is a key component of PGE's decarbonization strategy, as a mechanism to reduce load while helping customers save on their energy bills and improve their comfort, and PGE has a mandate to plan for and acquire all cost-effective energy efficiency. At present, multiple bodies receive and disburse funding for energy efficiency investments in Oregon. PCEF, however, has a tremendous opportunity to coordinate with and complement existing funding and, in many cases, go meaningfully beyond.



**Portland General Electric**  
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Sam Baraso, Program Manager  
Portland Clean Energy Fund  
June 2, 2023  
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For energy efficiency investments in multifamily housing, PCEF has identified key market barriers that may help unlock energy savings in this underserved market segment to the benefit of our community's most vulnerable and most in need of utility savings. For investments in single-family homes, PGE appreciates the emphasis on deep-energy retrofits for homeowners below 80% AMI.

For renewable energy investments, PGE suggests PCEF prioritize funding for renewable energy projects that include battery storage. Customer-sited solar and other renewable projects play a vital role in meeting our decarbonization goals. Batteries enable grid flexibility, which helps maintain grid reliability, and they make solar and all renewable energy resources more valuable to Oregonians when used to meet carbon intensive and expensive peak periods of electrical usage.

To help optimize our electric grid, PGE would strongly encourage PCEF to set appropriate standards for inverters, enabling interested customers to participate in PGE's virtual power plant demand response programs, which lower customer prices overall. We would welcome the opportunity to provide additional technical information to you on this item.

#### Transportation Decarbonization

There are significant opportunities for PCEF and PGE to coordinate programs supporting transportation decarbonization. For example, PGE is developing a platform that supports the purchase and installation by residential customers of grid-enabled products, such as electric vehicle (EV) chargers. PGE is currently working with a local credit union to support customers with loan financing for level 2 chargers. There may be an opportunity to collaborate on loan/matching savings tools for EV purchases.

PGE's Drive Change Fund (DCF) helps fund transportation electrification projects ranging from transit buses and passenger vehicles to electric bikes and community service vehicles. Since its inception in 2019, DCF has awarded millions of dollars to projects, including new electric vehicles and chargers. PCEF and DCF co-funded Metropolitan Family Services' Ways to Work, which provides financial education and resources to help increase access to electric vehicles for underserved communities. PGE would like to collaborate with PCEF on more projects like this.

We would also like to explore how PGE's Electric School Bus Fund and Fleet Partner Program can align with PCEF grant programs to drive further reductions in upfront costs for making the



**Portland General Electric**  
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Sam Baraso, Program Manager  
Portland Clean Energy Fund  
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switch to electric. PGE can provide support for school districts that are exploring electric buses for the first time, but a price premium for electric buses remains.

Finally, we would like to participate on PCEF's transportation workgroup to share information on our transportation electrification programs and help inform investments in transportation decarbonization.

#### Green Infrastructure

We support efforts to expand the city's tree canopy for carbon sequestration and health benefits, especially in underserved areas. We also note that well-placed shade trees can provide natural energy efficiency benefits to homes and other buildings. We applaud your aim for a low-carbon, equitable 82<sup>nd</sup> Avenue corridor and can serve as a resource on the selection and placement of new trees. The right trees in the right places will improve safety, reduce maintenance, and reduce tree-related power outages.

#### Regenerative Agriculture

As PCEF works to expand urban farming opportunities, PGE can help connect PCEF to electric landscaping tool manufacturers. Transitioning towards electric landscaping tools has health benefits, including fewer carbon emissions and reduced noise pollution.

#### Workforce Development

We support the significant funding allocation for workforce development efforts. It is critical that the clean energy transition provide equitable and inclusive career pathways that increase access to opportunities for underserved populations. The inclusion of metrics for workforce dollars helps provide clarity and targets. We recommend that there be flexibility in funding allocations, especially if applicants are proposing significant wraparound services as the cost per worker may be significantly higher. In our experience, wraparound services are critical to reducing barriers for priority populations. Having more flexibility in funding allocations would encourage these additional supports.

We appreciate that PCEF's funding structure allows for innovation and piloting of workforce strategies. We support the evaluation metrics identified and recommend additional data collection such as job placement after programming. This longer-term view will help determine what methods are working and which ones need further iteration.



**Portland General Electric**  
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Sam Baraso, Program Manager  
Portland Clean Energy Fund  
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In working with PGE trades-related contractors, we see the need for a focus on those employees who serve as the first point of contact for customers whose native language is not English. This would support more diversity of customers who are accessing services. Within PGE's service territory, the primary preferred languages of our customers are Cantonese, English, Mandarin, Russian, Spanish, and Vietnamese.

#### Climate-friendly Public Schools

PGE, through our Project Zero initiative, supports youth voice and climate education. PGE has supported development of climate justice electives in six Portland Public School high schools. We would be interested in discussing further collaboration on promoting youth climate education.

In closing, PGE is determined to reduce our greenhouse gas emissions by 80% by 2030, and 100% by 2040, while at the same time growing and further electrifying our economy. Achieving these goals is dependent on our ability to site electrical infrastructure throughout our service territory, including within the city of Portland. This includes siting substations, distribution, and transmission lines, both overhead and underground. Building infrastructure can be disruptive, but it is essential to achieving our collective decarbonization goals. Virtually all of the electricity used by residents, businesses, and governments within the city of Portland is generated outside the city limits, so it must be brought in on transmission and distribution lines. We ask that PCEF and the city keep this necessity top of mind in supporting climate and clean energy work.

We look forward to working together to achieve a clean energy future, especially for those on the front lines of climate change. Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Nik Blosser", with a stylized flourish at the end.

Nik Blosser  
Vice President, Public Affairs



**Commissioner Mingus Mapps**  
City of Portland

Date: June 2, 2023

FROM: Commissioner Mingus Mapps  
TO: Commissioner Carmen Rubio  
CC: Sam Baraso, PCEF Manager  
Donnie Oliveira, Director, Bureau of Planning & Sustainability  
Jillian Schoene, Commissioner Rubio Chief of Staff

RE: Portland Clean Energy Fund Climate Investment Plan Draft

Commissioner Rubio,

On March 21, May 11, and May 23, 2023 members from my office as well as other Council offices attended briefings on the Portland Clean Energy Fund (PCEF) Climate Investment Plan drafts. Council offices, along with bureaus and the general public, were invited to submit written feedback on the plan draft.

In the fall of 2022, I supported the updated amendments made in Ordinance 191046 to the PCEF structure. My support focused on two major issues: responding to and implementing the [audit recommendations](#) made in March 2022 by the City of Portland Auditor's Office, and updating funding eligibility to include government entities to be eligible for grants and contracts.

I am pleased the PCEF team took the Auditor's report and began implementing some of their recommendations shortly after it came out. The May 2023 Full Draft CIP ("Full Draft") also addressed some of my concerns on the preliminary draft by cross-walking the funding strategies to the City's Climate Emergency Workplan and providing clarity on the performance metrics and anticipated carbon reductions. I am highlighting some remaining areas that I believe need to be addressed in the Full Draft.

Given the moral imperative and urgency of reducing local emissions from the transportation sector, I have also asked the Portland Bureau of Transportation to submit a separate letter of feedback with their suggestions on how PCEF can best address these challenges over the next five years.

My feedback for the Full Draft CIP is in these areas:

- Performance Metrics and Climate Impact Assessment
- Expanded Coordination with City Efforts
- Public Works Service Area Opportunities

**Performance Metrics and Climate Impact Assessment**





**Commissioner Mingus Mapps**  
City of Portland

The original legislation included a requirement to measure, track and report to the public on the effectiveness of the grants in implementing the City's Climate Action Plan, and the Auditor's report spoke to the lack of performance goals. Commissioner Rubio in her [September 2022 memo](#) in referencing the updates coming to Council, proposed that the updated language would, "Draw clearer and more relevant connections between PCEF and the City's carbon reduction goals and would address audit recommendations." I agree with that recommendation and note that the Full Draft added "goal measures" with each funding category that includes carbon reduction estimates where appropriate and additional community goals.

There are two components that I hope PCEF will include in the CIP Final Draft. First, the proposed goal measures are estimates and forecasts derived from other entities and jurisdiction. I would like to see a methodology for measuring the actual carbon reduced, both to evaluate project/program proposals as part of the RPF process, and for ongoing adaptive management and accountability from funded projects and programs. Second, I would like to see how this estimated reduction compares to the City's goal to reduce carbon by 50% below 1990 levels by 2030. Will PCEF account for 15%, 25%, 80% of the gains the city needs to hit that target? Having performance metrics based on programmatic outcomes ensures the City is on track to meet its climate goals and ensures transparency to the general public that these dollars are being spent in accordance with the very purpose of their creation.

**Expanded Coordination with City Efforts**

I am pleased to see the strong coordination in the strategic partnerships with PBOT, Parks, and PHB for specific programs. However, it is not clear based on the Climate Emergency Workplan if those programs are the highest best climate investment. To achieve PCEF's stated goals around transparency and accountability, it is incumbent on PCEF to provide more clarity on how those specific programs were chosen. Understanding the emphasis on these strategic partnerships will help Council ensure that these and other high value programs are resourced appropriately to meet the City's 2030 carbon goals. It is unclear if those bureaus are prepared to take on the responsibilities – for example, \$20 million is proposed for an e-bike program to be run by the City. Before funding decisions are made that will require new programs to be stood up by City bureaus, it is important to assess capacity and allocation of work with impacted bureaus before finalizing any grant distribution. Further coordination and deeper discussions seem necessary for this work to achieve alignment and success.

Additionally, I would like to see broader coordination across climate programs across the city. The proposal to create transportation and tree workgroups is a great step, but those bureaus may need financial support from PCEF to participate in those workgroups. Additionally, there are other PCEF funding areas that have strong alignment with City programs that are not called out, nor is it clear that there was coordination. For example, for regenerative agriculture, the city has land acquisition programs in Parks and BES as well as a federally funded Brownfields remediation



**Commissioner Mingus Mapps**  
City of Portland

program in BES that could be brought to support and enhance those efforts - but it is unlikely that PCEF staff and Community are aware of those programs. To help create the space for this coordination to happen, I recommend that before the CIP is finalized, BPS host a joint meeting between the PCEF Committee and the City's Climate Preparedness inter-bureau team. This inter-bureau team is now chaired by BPS' Chief Sustainability Officer and includes climate experts from multiple bureaus.

Under the category "Multiple funding categories/other carbon emissions reduction projects", I encourage PCEF to include funds to support programs that the City is in the position to incubate and partner to build community capacity, and which do not otherwise fit in other categories. The CIP could include a catchall category and "opportunity" funding specifically for public sector partners that isn't bound by these current funding categories or the five-year cycle to allow the fund to support key opportunities and emerging ideas that show critical promise in emissions reduction and climate equity. It could also serve as the source for bureau match required for federal or state grants. The City is in a unique position to apply for federal and state grants that require a local match, but the bureaus are frequently unable to come up with matching funds in the current budget climate. We encourage PCEF to add a funding source that could be used by bureaus to provide match to unlock federal and state funds that will both compliment PCEF and make PCEF funds go farther.

A specific example in this realm are the many federal grants available for climate-related transportation initiatives from the historic infrastructure investments made available by the Biden administration. In 2023, PBOT has been successful in securing grants in this space, including \$2 million to pilot zero-emissions delivery zone and \$3.3 million to expand electric vehicle charging infrastructure in the right of way. However, because the bureau's operational funding is based on declining, fossil-fuel based revenue sources, PBOT's ability to access these grants is expected to drop in the coming years. If things remain on the current trajectory, the bureau will be unable to provide match funding for these federal grants, nor will it be able to pay for planning staff to put in applications. Thus, an opportunity to leverage the historic federal investment in climate action is lost even though a funding source may have been available through PCEF. We encourage the committee to consider this issue as they fine-tune the program structure to achieve maximum benefits for both climate action and climate justice for Portlanders.

There are other concerns I have about the design of this program. First, a five-year funding cycle on these specific funding categories is a long time given the urgency of climate change and the necessity of innovation to address climate challenges. The CIP should be revisited annually to assess effectiveness and revised, if necessary, in a similar manner to all other City operational, capital, and grant funding expenditures.

Secondly, I have concerns about the level of specificity in several of the strategic program areas. Instead of high-level programmatic allocation categories that invite creative solutions, this document dives deep into specific program categories that seem to pre-determine specific funding



**Commissioner Mingus Mapps**  
City of Portland

outcomes or grant recipients. Keeping a higher level at this stage will enable greater transparency about how RFP submissions perform on pre-established criteria for those programs. It will also enable a wider variety of project proposals to apply and for those ideas to be evaluated in a way that demonstrates accountability for these public funds.

**Public Works Service Area Opportunities**

As the Commissioner-in-Charge of the Public Works Service Area, I oversee programs of vast scope and scale to address climate change, mitigation, and resilience. These City bureaus along with others have subject matter experts who have been working on climate change for years through the often-difficult confines of their siloed portfolios. This work is a significant opportunity to bring these experts and community together. I have asked PBOT and BES to submit letters of feedback specific to their portfolio areas, and I address some concerns I have as well.

*Imbalance of expenditures between equal sources of emissions*

The Full Draft notes that Buildings account for 41% of total emissions in Multnomah County and Transportation sources account for 42% of total emissions. Yet the transportation decarbonization category is receiving only a quarter of the funding that renewable energy and energy efficiency (i.e. buildings) is receiving. I understand that the transportation category is a new category for PCEF but the CIP also declares “clean transportation system [is] an essential part of the strategy to meet the City’s climate goals.” While I understand the benefits of conducting planning and community engagement on the front end of this process, CIP should be prepared to dedicate more funding or reprogram funding in Years 3-5 to more directly mitigate transportation-based carbon on par with mitigation investment in Buildings. There are also clear, shovel-ready transportation projects that can be invested in today.

One example is the Frog Ferry, a community-driven proposal with more than 2,000 stakeholders and supporters that has been working for six years to launch passenger water taxi service in the Portland area. This project aligns strongly with the climate impacts and household economic benefits valued by the Fund. The initial three-year pilot would provide public transit service for North Portland, an environmental justice community that has long been underserved by bus transit. A modest contribution from the PCEF fund for the pilot could unlock a portion of the historic level of federal resources available for marine transit under the Biden administration. The ferry service would also have economic benefits and would create well-paying jobs supporting on the water service and repair. Willamette Technical Fabricators, a woman and minority-owned fabrication business focused on river infrastructure and transportation, is a potential partner to support the service through fabrication of the clean diesel and hybrid-electric boats at the heart of the project, construction of the docks, and ongoing maintenance, repair, and overhaul of the fleet. Investing in passenger water taxi service for Portland would also create broader benefits for the Portland community by fostering river stewardship, getting people back downtown, and building community resilience.

*Regarding Strategic Program 6: Comprehensive e-bike access and support*

To complement the proposed e-bike rebate proposal described in this program, I’d like to encourage PCEF to consider a strategic investment that would provide safe, well-maintained active



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transportation infrastructure in PCEF priority populations in order to reduce greenhouse gas emissions from the transportation system and benefit historically underserved communities. For example, investing in safe, well-maintained crosswalks, bike lanes, and neighborhood greenways in these areas will be critical to the overall success of PCEF's proposed comprehensive e-bike access and support strategic investment. The City of Denver's successful e-bike rebate program helped get thousands of people out of cars and into the bike lane, but it also demonstrated the need for continued maintenance and investment in active transportation infrastructure. I hope the City of Portland can learn from other cities' lessons and proactively allocate funding to address foreseeable challenges.

*Regarding Strategic Program 11: 82<sup>nd</sup> Avenue climate infrastructure and community resilience grant program*

Fulfilling community expectations for the 82nd Avenue corridor – particularly attending to the urban heat island effect and sidewalk deficiencies by widening sidewalks and adding street trees– will require resources beyond what is currently programmed for 82nd Avenue. Furthermore, local funding would allow PBOT to more quickly and efficiently deliver these projects compared to federal and state funding. PCEF's proposed allocation to PBOT for the 82nd Avenue corridor is the best short-term funding opportunity to invest in tree canopy and sidewalks.

*Regarding Strategic Program 13 – Access to fair and flexible capital*

One of the incubators that I am leading on behalf of the City is mitigation banking which has a strong climate resiliency and carbon sequestration potential that addresses environmental justice. I was disappointed that the possibility was not included even though PCEF received public comments supporting it. I believe that it could fit specifically in the access to capital funding category or in a proposed incubator/opportunity category. The City is prepared to move forward with a project in partnership with OMSI, the Columbia Inter-Tribal Fish Commission, and the Native American Advisory Committee that directly addresses all of the Equity + Climate Framework requirements. This mitigation bank could be a climate resilience/climate equity showcase and could be structured to reimburse PCEF for funds granted creating more of an endowment like approach.

Thank you for the opportunity to provide feedback. With an investment this critical for Portland's future, I hope all stakeholders can work collaboratively to ensure PCEF resources create the most impact for climate equity.

Sincerely,

Commissioner Mapps



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