



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 from public partners

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ID	Stakeholder Type	Organization	Contact Name
19	Education	Portland Public Schools	Guadalupe Guerrero
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Public Partners Feedback Guide – May 23, 2023

PCEF Climate Investment Plan Full Draft

Background

At the direction of Portland City Council, the Portland Clean Energy Community Benefits Fund (PCEF), in collaboration with the [PCEF Committee](#), is developing a 5-year Climate Investment Plan (CIP) to guide the investment of \$750 million in PCEF funds to achieve significant carbon reductions in ways that benefit those most impacted by the climate crisis.

1. Review the CIP draft

Review the full CIP draft to learn about the draft funding allocations and strategies. [This link will open a new window to the draft plan.](#)

2. Use the following questions to guide your feedback to PCEF staff:

- 1) What might be missing that should be added to the full draft that aligns with PCEF's equity + climate framework? (see below) Please describe:
 - a. How does your recommendation(s) impact benefits to frontline communities and measurable ghg reductions/sequestration?
 - b. How has your recommendation(s) been community-informed?
 - c. How would your recommendation(s) impact or improve accountability to PCEF priority populations?
- 2) Any other comments to share including what is working well in the full CIP draft and how to strengthen community and climate benefits.

3. Read the equity + climate framework:

Any strategic program concept considered for approval must align with PCEF's priorities. The four prompts below outline key elements of PCEF's equity + climate lens that a strategic program concept must affirmatively answer to be considered for inclusion in the CIP. Exceptions include capacity building and workforce development which do not have direct GHG reductions.

- **Benefits to frontline communities** – will the program create clear, significant, and measurable benefit to frontline communities?
- **Implementation feasibility** – can the program be realistically implemented at scale with existing City staff, partners, or contractors over five years?
- **Climate impact: greenhouse gas reductions** – will the program result in meaningful and measurable greenhouse gas reductions/sequestration?
- **Accountability** – do accountability mechanisms exist to ensure that communities of color, low-income populations, people with disabilities, and other vulnerable communities benefit from the

4. Submit your feedback via [online survey](#) or email: cleanenergyfund@portlandoregon.gov by **Friday, June 2.**

* PCEF priority populations are people with low income and people of color; priority populations for workforce and contractor development projects also include people with disabilities, women, and other people experiencing gender or sex-based discrimination in the workplace.



PORTLAND PUBLIC SCHOOLS
OFFICE OF THE SUPERINTENDENT

501 North Dixon Street / Portland, OR 97227

Telephone: (503) 916-3200

Mailing Address: P. O. Box 3107 / 97208-3107

June 2, 2023

Mr. Sam Baraso
Program Manager, Portland Clean Energy Fund
1810 SW 5th Avenue, Suite 710
Portland, OR 97201

Dear Mr. Baraso,

As Superintendent of Portland's largest PK-12 education system, I am thrilled that the Portland Clean Energy Fund recognizes the central role of students and schools in fighting climate change. If I had just one comment on the Climate Investment Plan, it would be that both areas of investment – schools and students – are critical.

Investments in schools offer a distinct opportunity to both reduce the region's emissions and to make the threats of climate change visible in every Portland neighborhood. Through the generous support of Portlanders, our Bond-funded projects have made specific buildings more efficient – but only a fraction of our over-ninety properties. The proposed \$16,930,833 investment in our buildings, and the \$50 million you will invest across the city's schools, will accelerate our ability to reduce our carbon footprint. After all, schools anchor every Portland neighborhood. Physical changes to those buildings will be seen by all Portlanders, and will afford another opportunity to educate Portland's children and youth about climate change.

But I am most grateful for your direct investments in our students. Portland Public Schools students, including many from frontline communities, have long advocated for climate justice. They have varying levels of direct experience with climate change, but some students understand intimately how inequality exacerbates the severity of environmental injustices. They see clearly how the climate crisis compounds individual and systemic injustices, and they have rightly demanded that adults in their lives respond with clear action and real urgency. And you are responding with the overall Climate Investment Plan – but also by investing directly in their ideas, dreams, and solutions.

In our own [Climate Crisis Response Policy](#), and in our other climate-related work, we've always tried to center students. We've supported student climate activism through our Climate Justice Youth Advisory and our civic engagement toolkit. We're also developing curricular materials that empower youth to analyze data and create solutions to sustainability and climate justice issues in their community. But your \$3-million investment in student-led projects is bold, courageous, and

appropriate. It recognizes what we know: that our students are capable and deserve to play an active role in building a better, more climate resilient future.

I see great potential for our district to collaborate on other aspects of the Climate Investment Plan but, from my perspective within the city, I am most grateful for your critical investments in students and in schools. Thank you for seeing us and our students as partners in your work. Our shared commitments – to racial equity and social justice, to centering students, and to urgently addressing the climate crisis – will carry us forward together.

Sincerely,



Guadalupe Guerrero
Portland Public Schools

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

Andrew Scott

Vice Chair
Board Director,
Portland Public School
District

David Linn

Board Director,
Centennial School
District

Sonja McKenzie

Board of Directors,
Parkrose School District

Elizabeth Durant

Chair
Board of Directors,
Parkrose School District

Brenda Rivas

Vice Chair
Board of Directors,
Parkrose School District

Julia Brim-Edwards

Board Director,
Portland Public School
District

Byronie McMahon

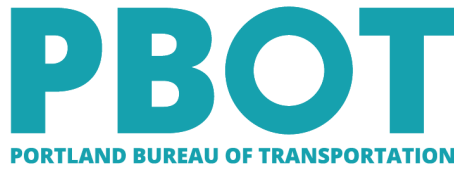
Board Student Rep.,
Portland Public School
District

Rose Solowski

Chair
Board Director,
Centennial School
District

Kate Sherman

Board Director *Elect*,
Multnomah Educational
Service District



1120 SW Fifth Ave, Suite 1331, Portland OR 97204

Phone: 503-823-4000 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



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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, 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

1120 SW Fifth Avenue, Suite 858
Portland, Oregon 97204
503-823-PLAY (7529) | Fax 503-823-6007

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.

Clean Energy Fund

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
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

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

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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 CO₂-equivalent (CO₂e) emissions per gallon of water, or 0.236 kg CO₂e 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.

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.^[1] 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 CO₂-equivalent (CO₂e) emissions per gallon of water, or 0.236 kg CO₂e 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.

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.

^[i] Water Research Foundation, “Residential End Uses of Water Version 2”



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



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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



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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



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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: 82nd 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



Commissioner Mingus Mapps
City of Portland