

2023 ACSI Members

Mara Gross, Chair

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Lukas Angus, 7 Waters
Canoe Family, and member of
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Dr. Derron Coles, The
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Adah Crandall, Sunrise
Movement PDX

Jona Davis, Portland NAACP
Environmental Justice
Committee

Dr. Koffi Dessou, Togo
Community of Organization of
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Samantha Hernandez,
Oregon Physicians for Social
Responsibility

Tori Heroux, Oregon Dept. of
Environmental Quality

Rick Hodges, PGE

Tammy Lee, Portland State
University

Sasha Pollack

Emma Sagor

March 6, 2023

Dear Chair Vega Pederson and Commissioners,

The Advisory Committee for Sustainability and Innovation (ACSI) advises the Board of County Commissioners and the Office of Sustainability on policies and initiatives that enhance equity, environmental justice, environmental stewardship, and inclusive prosperity. We are informed by [our charter](#), which we updated in 2021 to acknowledge our treaty obligations to tribal nations and better align with the County's [Environmental Justice Resolution](#).

We are pleased to submit this annual letter to share recommendations for fostering an equitable, healthy, low-carbon community where every person has what they need to thrive.

CONTEXT

Our region and the world continue to experience the climate crisis in real time. This past summer, we experienced the [hottest August, September, and October on record](#), with very little rainfall for several months. The now-recurring extreme heat and smoke underscore the need to push boundaries to accelerate the transition to clean energy to mitigate the crisis. We have the responsibility to protect people and ecosystems in a climate-changed world.

Climate and sustainability issues are deeply connected to the County's health and social services. Climate change causes or exacerbates issues of homelessness, emergency management, health, air toxics, water quality, and even sexual violence and other crimes. The negative impacts are most concentrated in low-income communities, communities of color, and other historically marginalized groups, and solutions should be targeted to address these inequalities.



PUBLIC HEALTH LEADERSHIP

The County's role as the local public health authority is an essential tool that should be used to protect the health of its residents. We appreciate the County's leadership in publishing a [report](#) that acknowledges the health impacts of gas appliances in the home, especially in the face of potential legal threat from gas utilities. Low income and renting households are the most vulnerable to poor indoor air quality from gas cooktops and other sources of pollution.

The County can build on this report to empower individuals and communities to act and further shape policy. We encourage the Commissioners to consider how to expand current woodstove changeout programs to include gas equipment. Utilities may be able to use federal funding from the Inflation Reduction Act to pivot to cleaner sources of energy. The County should initiate conversations with utilities and determine how to leverage such funding opportunities to reduce natural gas dependence and improve indoor air quality.

The County should also explore regulation. Eugene, Oregon recently became the first Oregon jurisdiction to ban gas hookups in newly constructed housing, joining over 100 jurisdictions around the country including many cities in Washington and California. Meanwhile, DC has not only already banned gas in new buildings starting in 2026 but is working on legislation to [fund retrofits of low-income homes](#) with electric equipment instead of gas.

FEDERAL FUNDING OPPORTUNITY

The federal Inflation Reduction Act (IRA) of 2022 is our country's largest climate and environmental justice investment in history. IRA includes billions in [funding for local governments](#), making it a huge opportunity for Multnomah County to invest in priorities including air quality, clean energy transition, housing, reducing risks caused by climate change, vehicle charging, and workforce development. It also provides opportunities for individuals, businesses and non governmental organizations which the County may have a role in facilitating by providing technical assistance to those entities in order to better leverage opportunities for tax credits and other funding.

We recommend that the County allocate resources to take advantage of these federal funding opportunities by increasing staffing and support for grant research and writing capacity. This investment should pay off many times over, in public health and resilience as well as financially.

CLIMATE AND CLEAN ENERGY RECOMMENDATIONS

We look forward to continuing our work with staff from the Office of Sustainability to provide feedback on the Climate Justice Plan (CJP) process, climate resilience, and policy work related to a just energy



transition. Long term investment in climate resilience through a climate-reparations lens will remain essential to the County's success as a leader in sustainability. This year's suggestions from the Climate and Energy Subcommittee are centered around Black, Indigenous, and other people of color (BIPOC) communities, health and climate data, and redistribution of resources through innovation and collaboration.

Connect health and climate to every policy decision

Climate change is here and is already impacting everyone living in Multnomah County, but the impacts are disproportionate on several already vulnerable communities. As we face this new reality, we must consider the impacts of climate change on every policy the County implements, both from an adaptation perspective and a mitigation perspective - we must protect the health and well being of our community members and infrastructure, but also consider the greenhouse gas pollution consequences of every policy, and strive to minimize these.

We support the County's efforts to demand that access to utility service is recognized as a human right as we know that utility shutoff can be a matter of life or death, particularly in a climate changed world of extreme temperatures. We applaud the Office of Sustainability's leadership in shaping legislation and regulations around disconnection and arrearages and believe this work should remain a priority.

Historically, the most marginalized communities have had the least say when it comes to how the County should be responding to climate and energy planning. We know many of these same community members are under-resourced when it comes to responding to severe weather events such as extreme heat and cold. **Information about what communities are most impacted by extreme weather events should be collected and used in conversation with other stakeholders** to develop more formal and long-lasting plans for climate resilience.

Support BIPOC-led sustainability movements, data collection and workforce development

We highly recommend that the County continue to support work that centers BIPOC community members and organizations. We know that policies based on data are critical for effectively solving problems, yet there is work to be done to create an equitable and just process when collecting data related to climate change and its impact on health and the environment. Members of Climate & Energy are specifically interested in the environmental monitoring of indoor and outdoor air quality in BIPOC households and neighborhoods, and easing the administrative burden on the organizations collecting the information in order to monitor, track, and report on air quality.

Generally speaking, indoor air quality is understudied and underregulated. **We recommend Commissioners contact Oregon Health Authority to determine how and if they are working on this issue**, including what local jurisdictions can do to improve community education and health



outcomes from indoor air pollutants. **The County should also consider holding community educational events** about the health impacts of natural gas, other benefits of switching to induction cooking, and incentive programs, given the general lack of awareness around these issues.

We believe that BIPOC-led workforce development is one of the most impactful and innovative ways to broaden access to sustainable and resilient solutions in the County and encourage the Office of Sustainability to prioritize this and related work. For example, BIPOC-led initiatives and organizations are prepared to work with the County to collect health and climate data and hold conversations with the community about next steps in response to these findings. The County's support for BIPOC and diverse green workforce development across the board will ensure that experts working on these solutions bring their lived experience and new solutions to the table. This development also expands the workforce available to more rapidly implement climate solutions such as deep energy retrofits, heat pump installation and EV charging.

Innovate and collaborate

We encourage the County to continue to seek local, innovative, and equitable solutions for decarbonization within the residential, commercial and industrial sectors and to collect community input on renewable energy siting that benefits rather than harms our environmental justice communities. ACSI remains focused on how funding for climate and energy solutions can be shaped to better serve the environmental justice population of Multnomah County. As mentioned above, we recommend investments in building capacity to respond to climate change. Beyond direct emissions, the County must seek solutions to provide dependable access to clean and affordable energy that realize benefits like less burdened and more resilient communities. Ensuring a just energy transition will take strategic and transparent engagement with stakeholders within the various sectors, not limited to industrial and commerce; residential communities must be engaged in these processes to build trust and embrace change. We encourage the Office of Sustainability to continue to advocate for inclusive decision-making processes that ensure that environmental justice communities in Multnomah County benefit from the decarbonization of our energy systems.

Since the Office of Sustainability continues working on meeting our clean and renewable energy goals, the "community green tariff" emerged as a tool that the County can use to attain that goal. We recommend that the Office of Sustainability works to ensure that community green tariff is more than a tool for decarbonization, and that instead is grounded on procedural equity, and realizes benefits to Multnomah County's environmental justice communities with a climate-reparations lens.

FOOD AND WATER RECOMMENDATIONS

The Food and Water subcommittee are offering suggestions based on new ideas, as well as revisiting and elaborating on suggestions from last year's letter, with an emphasis on total food system and watershed health.



FOOD: Some of the biggest topics that have come to the front of the food discussions are:

- Elaborating on last year’s recommendation “to protect as well as create farm land, and create access especially to marginalized communities,” we recommend trying to **negotiate use of land adjacent to Multnomah County's CROPS Farm**. The land is owned by McMenamins, approximately 3 acres, mostly invasive blackberries that crowd out other species, and would be a great extension to the CROPS growing space. The County should work with McMenamins to see if a lease could be negotiated for that land.
- Furthering the idea of food security: Everyone should have access to good healthy food, and we want to see more emphasis on fresh and local food in programs such as WIC and SNAP. There needs to be more outreach and culturally specific, equitable services from people in those Communities, possibly bringing in local farmers and food producers from those Communities as well. **The County should build on farm CSA programs offered through the REACH Program and extend to more culturally specific clients and growers.**

WATER: Some topics around the issue of water are:

- **Dedicate \$50,000 to support the scoping and re-establishing of the Sandy River Watershed Council.** The Sandy River has been without a watershed council and needs County support to reestablish a council. Efforts are underway to determine how to build a new council with more focus on communities of color. In addition to cash, staff support from the Office of Sustainability could help a very important cause in protecting a vital resource for those who live, work, and recreate in and around the river basin, as well as the plants and wildlife for generations to come.
- **Dedicate use of “one time only funding” to address large projects specific to stormwater treatment and culvert repair/replacement.** This would be an addition to last year’s water recommendations, adding further and ongoing threats of Mercury, 6PPD-Quinone, Pesticides, Fertilizers and Toxic Algae Blooms associated with untreated runoff and outdated infrastructure. One time funding could be allocated to design in year one, with implementation in the following years. Using one time funding allows the county to make prudent capital investments that will pay dividends for the river, wildlife and community.

TRANSPORTATION RECOMMENDATIONS

Our transportation system today is broken. Transportation is the biggest contributor to greenhouse gas emissions in our County, and traffic injuries are the third leading cause of death. Significant disparities exist within these statistics, too—the rate of [traffic injury is nearly double for Black people in Multnomah County](#), and we know [frontline communities are impacted first and worst by the climate crisis](#). Addressing these climate and safety impacts is paramount, and in doing so, solutions should



put people first before cars. Now is the time to take the bold steps needed to reimagine our transportation future.

Prioritize funding for safety improvements and multimodal projects

We ask the Commission to push local, state, and regional partners to oppose expanding roadway capacity for private vehicles, including on the Interstate Bridge Replacement Project and I-5 Rose Quarter Expansion Project. Other communities (e.g. [Denver, CO](#) and [Los Angeles, CA](#)) are proving that with strong local leadership and effective coalition building, harmful freeway expansions can be stopped. The political momentum for continued road expansion in a time of climate chaos is continually diminishing, and the County should join community members who know we must prioritize projects that help people travel by bike, buses, and trains.

It is important that the Commission continue to ask questions and think critically about ODOT and WashDOT's proposals for the Interstate Bridge Replacement Project. While IBRP in its current form is often framed as an inevitable reality, we urge the County to give serious consideration to alternatives to ensure that the project is a right-sized, cost effective bridge in line with our climate and equity goals.

We also urge the Commission to advocate for greater local control on how transportation dollars are spent and that these opportunities prioritize safety improvements on our streets and expanding multimodal transportation options. For example, the County can advocate for multimodal and safety projects in the ongoing Regional Transportation Plan update. And while we see promise in transportation pricing and funding tools being discussed at the state level (e.g. congestion pricing and road usage charges), **the funding from these sources should be used to support active and public transportation infrastructure and not further road expansion.**

Build accountability through data visibility and educate County residents about transportation safety and sustainability

There is real power in publishing data, both through building community awareness of critical issues and accountability among actors with a responsibility to address these trends. The County has been a leader in sharing eye-opening data and analysis about transportation, safety, and health outcomes, exemplified by the [REACH Traffic Safety Report](#) on disparities in safety for Black residents in the County. **ACSI asks the County to continue to regularly publish data on transportation disparities and design interventions to increase safety.** We also ask that the County track progress over time, and that this data be made publicly accessible so that it can be shared widely with regional partners who contribute to transportation outcomes.



ACSI also asks the County to protect public health by requiring major transportation projects to complete a Health Impact Assessment as a precursor to County support. This tool will reinforce the criticality of putting people and the environment above cars when improving transportation infrastructure.

Be a local leader and educator on sustainable transportation and innovation

Finally, we recognize that our transportation system is still built largely around motor vehicles, and pressures of gentrification and displacement mean that access to a car is critical for many of our most vulnerable County residents. As technology quickly evolves, the County should use its power to promote the transition to electric vehicles, educating residents about rebates and charging access.

We ask the County to use its platforms to educate residents about transportation options, safety, and climate impacts (for example, by sharing transportation resources through the SUN Community Schools and promoting [transit education](#)). The County should also advocate for stronger low carbon fuel standards and the shifting to renewable diesel for freight vehicles. An analysis of potential environmental and public health impacts should be conducted before widespread adoption of any new fuel, including renewable fuels. While leadership in the transition to electric mobility matters, there is also no path in which vehicle electrification is a stand-alone solution to transportation emissions; we must still reduce car dependency in the first place to meet our goals.

AIR TOXICS RECOMMENDATIONS

We thank the Commissioners for their leadership in advocating for improved air quality on a local and statewide level. We urge the new Chair to continue to prioritize clean air for everyone, all the time. This work is especially crucial because policy at state and federal levels continue to fail to address the severity of air pollution experienced by Multnomah County residents. We ask that you continue that legacy in several areas that have a significant impact on County residents: wood smoke, diesel pollution and indoor air quality.

Expand woodstove change-outs

We applaud the Commissioners for funding a woodstove changeout program, which prioritizes low income residents. Wood smoke is a potent source of air toxics and small particulate matter, and has a disproportionate impact on Black and Latinx populations and medically vulnerable residents. According to EPA's National Air Toxics Assessment, residential woodburning alone accounts for 11% of the total cancer risk from air toxics in Multnomah County. **The County should continue expanding programs to make heat pumps available to all who need them.**



In Multnomah County, approximately 0.5% of residents are reliant on wood for heat. These vulnerable residents are already extra-burdened by health, educational and economic impacts from social and environmental inequities. Savings in health and climate impact far outweigh the costs of financing replacement of this dirtiest heat source with clean, efficient heat pumps. Heat pumps will also provide frontline communities with cooling during our increasing hot weather events as well protection from dangerous air pollution during wildfires. Most critically, **changeout program staff positions should be made permanent**. Expansion of woodstove changeout programs will be especially critical in 2025 and beyond, as the current funding for changeouts expires at the end of 2024.

Expand residential wood burning education

We ask that you consider taking other measures from the policy recommendations put forth by the 2021 Woodsmoke Work Group. The majority of residential wood burning in Multnomah County is by choice and largely driven by social norms around ambiance and socializing. Based on DEQ survey data, wood cord deliveries in the County are disproportionately delivered to affluent neighborhoods; these residents are likely not aware of the climate and health impacts they incur on themselves and the most vulnerable of their neighbors. Leading with an Environmental Justice lens and health forward approach, **further educational outreach programming and public advertising is key**.

Regulate commercial cooking emissions

Commissioners should consider taking action to reduce emissions from commercial cooking, with a special focus on new restaurants that intend to install wood-fired ovens. Generally, these restaurants are located in densely populated neighborhoods near schools and businesses presenting a grave threat to public health. Presently there are no pollution control requirements or limits placed on commercial cooking operations.

The County can curb these health impacts using its regulatory authority over local restaurants. Initial discussions with regulators indicate that the County might be well-served to expand regulations beyond wood-fired cooking to all commercial cooking operations. We recommend that the County put together a technical advisory working group to better understand culturally specific restaurant needs and to learn from other jurisdictions to help determine the best path forward.

Diesel Pollution

Diesel pollution remains one of the most challenging and insidious environmental justice issues within the County. Areas of the County with the highest concentrations of diesel exhaust have estimated cancer risks more than 500 times higher than the state's benchmarks. This problem is especially entrenched in low-income and BIPOC neighborhoods, where [zoning requirements have not caught](#)



[up to local jurisdictions' environmental justice and health equity goals](#). **The County should keep putting pressure on regulators to reduce pollution on our roads, on construction sites and in railyards and distribution centers.**

CENTERING CLIMATE JUSTICE

In all spaces where the County leads or influences sustainability decisions, ACSI advocates for centering the values called for by frontline communities of **climate justice, health equity, joyful human experience, and urgent action toward transformative change.**

We understand that fulfilling these recommendations requires extensive effort from the County and its partners. Taking bold action to prioritize our communities may be controversial, or scary, or both. However, this type of brave leadership is the only way we can stop the climate crisis and achieve justice for our communities. The stakes are too high to compromise, go halfway, or save important steps for “next year.” The time for you to act is now; our communities are counting on you to do so.

Lastly, we acknowledge that though ACSI strives to be an inclusive and diverse advisory body, we are far from representing the entirety of the county, especially those who may be most impacted by environmental injustice and systematic disenfranchisement. We urge the County to continue to increase engagement with community groups, especially BIPOC, low income, and youth individuals.

We thank the Commission for taking the time to carefully consider our recommendations, and look forward to working with you in the months to come.

Sincerely,

Members of the ACSI Committee