

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 [\[cite\]](#).

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. ACSI recommends that Multnomah County centers community priorities as it pursues regional and federal funding in pursuit of its sustainability-related [goals, policies and plans](#).

ACSI members appreciate the strong protective leadership demonstrated by County leaders to manage major threats to the health and safety for inhabitants of our region. We applaud ongoing efforts to devise financial and legal pathways to prevent catastrophic toxic releases at the Critical Energy Infrastructure (CEI) Hub, as well as legal action against fossil fuel corporations profiting from climate disruption and organizations that assist in climate disinformation.

Our 2025 letter restates recommendations from past years, as well as new suggestions that have come to our attention as we talk with Staff working on emergency management, response to extreme weather, human health, watershed health, government affairs, [\[\(insert others\)...\]](#), and with public/nonprofit partners. ACSI members are also connected with a range of groups gathering information from members of frontline communities and harnessing funding opportunities associated with federal grant programs, the Portland Clean Energy Fund, and other funding opportunities to support a just energy transition.

## Energy, Air Quality, and Climate Recommendations

The recommendations listed in this section are important for Multnomah County to continue to advance its efforts to create a just, equitable, livable, resilient, and low-carbon community by centering the priorities of environmental justice communities.

We sought to ground our recommendations on our experience and on the County's work on climate justice. While not ready for publication yet, the forthcoming [2025 Climate Justice Plan](#) draws from the 2023 Community-driven climate justice framework [Rooted in Values. Guided by Vision](#), and will provide detailed cutsheets with recommendations for advancing sustainability efforts within the County, region, and state through public-private-civic partnerships.

## Energy:

Multnomah County should continue to advocate for investments that meet Oregon's decarbonization targets while increasing energy systems reliability and resilience, as well as community health and resilience, with a focus on vulnerable communities. ACSI members are concerned that utilities are acquiring clean energy resources at a pace that appears out of step with their decarbonization goals. We are also concerned with the ongoing utility requests for rate increases and the unsustainable burden these place on communities. The January 2024 winter storm and summer heat waves were a reminder of the importance of focusing not only on utility infrastructure, but also on programs and policies that ensure that people can access and afford energy during severe weather events.

Multnomah County should continue advocating to utilities and their regulators for actions that are consistent with the County's just energy transition goals toward affordable renewable energy.<sup>1</sup> Over a quarter of residents experience energy burden,<sup>2</sup> which is exacerbated by utility rate increases and increased climate-change-related demand, as what we have traditionally considered outlier weather events are starting to become commonplace.<sup>3</sup> Multnomah County should continue to prioritize procedural justice in regulatory proceedings through growing the capacity of environmental justice communities to participate, and by advocating for regulators and regulated entities to prioritize the voices of these communities.

1. Advocate for regulatory decisions and legislative solutions to curb rate increases and to protect residential and small commercial customers from costs and risks associated with meeting growing tech sector electricity demands. Energy utilities serving Multnomah County have had double digit increases in the last few years. For example, as of October 2024 Pacific Power had increased its electricity rates 35% since 2021,<sup>4</sup> PGE has 30% since 2022,<sup>5</sup> and NW natural 32.7% since 2022.<sup>6</sup> Electric utilities in the region are also projecting significant increases in demand in the coming years to serve high tech sector loads, including data centers. Solutions for exploration could include limits on how often utilities can seek rate increases, mandatory multiyear ratemaking, interruptible-load tariffs or the expansion of direct access for new large loads in addition to

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<sup>1</sup> Multnomah County, Resolution 2017-046 (Jun. 1, 2017), <https://multco-web7-psh-files-usw2.s3-us-west-2.amazonaws.com/s3fs-public/2017-046%20-%20Mult%20Co%20Signed%20100by50%20Resolution.pdf>.

<sup>2</sup> Oregon Department of Energy, Energy Profiles: Multnomah County (Oct. 29, 2024), <https://energyinfo.oregon.gov/energy-profiles-2024/multnomah>.

<sup>3</sup> In 2024, we have seen the highest levels of disconnection since reporting began in 2018 for both electric utilities that serve Multnomah County. Oregon Public Utility Commission Docket UM 2211, *Staff's Letter* at 1-2 (Nov. 22, 2024), <https://edocs.puc.state.or.us/efdocs/HAH/um2211hah333216114.pdf>.

<sup>4</sup>

<https://oregoncub.org/news/blog/amidst-pressure-pacific-power-lowers-rate-increase-request-for-2025/3015/>

<sup>5</sup> <https://oregoncub.org/news/blog/pges-request-to-raise-rates-in-2025-lives-on/2986/>

<sup>6</sup>

<https://oregoncub.org/news/blog/myth-busting-why-is-clean-energy-is-not-making-energy-more-expensive/2981/>

community-identified solutions that may emerge from the Climate Justice Planning process.

2. Advocate for, and pursue, investments that increase energy systems reliability and resilience, with a focus on energy poverty and jobs, consistent with the County's just energy transition goal.
  - a. Engage on grid reliability conversations in policy-making spaces.
  - b. Continue to advocate to protect and advance measures that decentralize the grid, such as community-based renewable energy infrastructure deployment, net energy metering, and energy storage.
  - c. Continue to engage in the State's [Solar for All](#) program planning process with an eye to ensuring that historically-excluded communities, like renters and households experiencing low-income, receive the benefits of solar such as lower electric bills and energy ownership.
  - d. Provide strong directives to pursue potential grants and funding for grant writing support. Prioritize grant opportunities with funding in the Office of Sustainability's budget for grant writing support and clear direction to departments to capitalize on available grants.
  - e. Advocate for more resilient transit services during severe weather events.
3. Pursue community health and resilience, with a focus on vulnerable communities.
  - a. Share comprehensive energy assistance program information through all County programs that interact with the general public (e.g. clinics, libraries, social work).
    - i. 211info to access utility assistance programs
    - ii. County weatherization and change-out programs
    - iii. Other community-based programs such as Care when it is cold, and Help when it is hot
    - iv. Mutual aid and loan resources for repairing pipes and other critical home repairs after severe storms; Individual development account programs<sup>7</sup>
  - b. Direct the Office of Sustainability to develop a mechanism to enhance coordination and resources for landlords with the goal of supporting landlords in maximizing environmental justice benefits to their tenants. For example, this mechanism could include updating and maintaining [County information resources for landlords](#), such as information about energy and weatherization retrofit resources, indoor air quality, etc.
  - c. The County should continue to support the development of resilience hubs and expand the system of shelters that people have access to across Multnomah County during power outages and excessive heat/smoke days. The need for shelter exceeded forecasts in 2024. The County should continue to work to address gaps, including capacity at buildings, vehicles that can transport people, finding staff to work at shelters, and volunteer training.
    - i. The County should continue to grow its capacity to connect the community to non-county resources that support community members during resilience and severe weather events.

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<sup>7</sup> [About the Oregon Individual Development Account Initiative](#)

- d. Increase efforts to proactively inform community members about strategies and resources to stay safe during severe weather events, and allocate greater resources to coordinate with, and support, programs that distribute goods like air conditioners and air filters, especially outside Portland.
  - e. Leverage resources by coordinating with Portland Clean Energy Fund staff on information and workforce development projects that align with the County's Climate Justice Plan and Environmental Justice Resolution goals, and that benefit residents in East County communities. This action is critical given how many frontline community members have been displaced to East County.
  - f. Work with other providers to better understand how many households have been served by air conditioning, ductless heat pumps, air filters and other household resilience measures to understand the additional need and how different entities, including the County, can coordinate to better serve EJ communities.
4. Request that utilities present to Multnomah County on progress on their decarbonization efforts. Oregon House Bill 2021 requires Portland General Electric and Pacific Power to achieve an 80% reduction in the GHG emissions associated with serving Oregon customers by 2030, 90% by 2035, and 100% by 2040. However, both utilities have recently scaled back their plans to pursue new renewable resources in the near-term, and neither utility has an acknowledged, long-term Clean Energy Plan. A presentation to the County could include information about why renewable procurement plans have changed and what the utilities are doing to improve their long-term planning activities to meet the State's requirements. Now that the Oregon Department of Environmental Quality has reestablished the Climate Protection Program, which requires a 90% reduction in greenhouse gas emissions from fossil fuel use by 2050, NW Natural could outline how it plans to meet the Program's emission-reduction requirements while maintaining affordable rates.

## Air Quality:

Pollution resulting from the indoor and outdoor combustion of fossil fuels, as well as refrigerant and other chemical releases, has uneven and lasting health impacts on members of our community. This is particularly true for low-income residents and people of color who are disproportionately likely to live adjacent to transportation corridors and industrial areas. The Department of Environmental Quality has increased the number of monitoring systems, but this increased monitoring does not capture local conditions, especially during inversions. Additionally, the United States lacks indoor air quality standards, and pollutants concentrate where Americans spend most of their time.<sup>8</sup>

1. We recommend that the County take the following actions on outdoor air quality:
  - a. Support and partner with Change is in the Air Program (CAP) and Oregon DEQ's Community Air Action Planning (CAAP) and other efforts to collect

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<sup>8</sup> [A Review of the Evidence: Public Health and Gas Stoves](#), 2022

- community-based data on indoor air quality, and to create a community-owned dashboard on local air quality.
- b. Continue implementing the Wood Burning Restriction Rules, and expand distribution mechanisms for the notices so that they appear within commonly-used information sources like weather apps and other resources that the community accesses to seek information on current conditions.
2. We also recommend that the County continue efforts to ensure healthy indoor air quality by taking the following actions:
- a. Explore existing model language from other jurisdictions to inform the development of clean air standards for household appliances in the County's role as the local public health authority, in alignment with air quality recommendations from the [2024 Letter](#).
  - b. Publish guidance for health care workers about the connection between asthma and indoor combustion,<sup>9</sup> as well as resources to finance appliance upgrades.
  - c. Advocate for local building codes requiring improved ventilation systems and air filtration standards in rental properties and public buildings, prioritizing vulnerable populations.
  - d. Develop a report on the Board's consideration and any progress on these items by December 2026.
3. In its preparedness plans, we recommend that the County's Office of Emergency Management should include the ability to respond to toxic release events, i.e. from train derailment or the CEI Hub.

## Climate

1. Multnomah County should continue to prioritize action on increasing access to high-efficiency heat pumps for air and water heating because they deliver both climate and air quality benefits, especially as a replacement for gas or wood burning heating elements.
  - a. Leverage Energy Trust, Earth Advantage, PCEF and federal Inflation Reduction Act funding streams by fully funding permanent positions for Woodburning Exchange programs **[current status?]**.
  - b. Allocate flexible, one-time-only funds to help ensure that all participants in change out programs can be served.
  - c. Address funding gaps to allow greater access to heat pumps through leveraging grants and general budget allocation. The County should explore microlending opportunities for residential contractors and households similar to the [Seeds for the Sol program](#) that serves other Oregon Communities.
2. Explore how Multnomah County can encourage cleaner heating equipment in new construction, especially in the context of the state focus on housing development.

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<sup>9</sup> See the American Medical Association's Resolution 439  
<https://www.ama-assn.org/system/files/a22-refcmte-d-report-annotated.pdf>

3. Consider advocating for an Environmental Rights Amendment ballot referral in the legislature.
4. Support local climate resilience by making sure that County initiatives, including many identified in this letter, support BIPOC entrepreneurs developing climate-focused businesses, such as clean tech startups or sustainability consulting services, home energy retrofits, creating local jobs and solutions.

## Food and Water Recommendations

### Localized, Equitable Sourcing of Food

Multnomah County has an important opportunity to reduce emissions, create jobs and strengthen our local economy in how it purchases large quantities of food for shelters, jails, and catered meetings. This can have an especially positive impact when food is purchased from Black Indigenous and other People Of Color (BIPOC) farmers and producers, from communities that have historically been marginalized or exploited.

In alignment with the REACH Healthy Food Procurement program, the Committee supports the recommendation to dedicate a minimum percentage of food service contracts to BIPOC growers and producers with annual percent increase.

ACSI recommends that the Health Department prepare and issue a report on where the county currently stands on sourcing 10%+ of food from BIPOC growers and continue working on ACSI's 2023 recommendation to revise county procurement policies to make it easier for small, local food producers - especially BIPOC producers - to become vendors.

### Access to a Swimmable Willamette

In late summer Multnomah County residents need a place to cool off. Thanks to public investments in regulation, monitoring and cleanup, the Willamette River is now safe to swim in. This is a major accomplishment that inspires hope. But, because of a legacy of resource extraction and increasing temperatures due to the climate crisis, the Ross Island Lagoon has become an incubator to toxic algal blooms that can reach the main stem of the river, and threaten the health of people, pets, and wildlife. Thanks to investments by the Multnomah County Board of Commissioners, a solution to flush the lagoon by reestablishing a channel on Ross Island is being designed. This problem won't be solved overnight, however, and will require ongoing leadership from the public sector. The Multnomah County Office of Sustainability and Office of Government Relations with the leadership of the Tribal Affairs manager, have started an annual convening to bring together parties from government, including Tribal governments, and non-profits, to focus on solutions and share information.

ACSI recommends Multnomah County support legislation in the upcoming legislative session that will dedicate more resources to restoring the flushing channel to Ross Island, while also continuing to convene parties and prioritize Triable Government involvement.

## Reducing Tire Chemical Pollution

6PPD is a chemical that prevents automotive tires from degrading (i.e. breaking down) and helps them last longer. When 6PPD is exposed to air, it reacts with ozone to create 6PPD-quinone (also known as 6PPDQ). 6PPDQ is lethal to coho salmon and can contaminate water systems. Tribal governments and the Washington Department of Ecology are paying close attention to 6PPDQ, working with tire manufacturers to find a replacement chemical, and developing guidance for stormwater treatment best management practices. This chemical is lethal to fish and can contaminate water systems when stormwater runs off roads into streams and storm drains. It causes harm at levels even lower than what was deemed acceptable for DDT.

A regional working group led by local entities, including counties, cities, watershed council, is coordinating collaborative efforts among other regional partners, including Soil & Water Conservation Districts, universities, and state and federal agencies to gain a deeper understanding of the impact of 6PPDQ in Oregon rivers and the solutions to reduce 6PPDQ impacts to local salmon and native fishes. Increased support and leadership from DEQ would help further this work. Currently DEQ has very limited resources to engage in this emerging issue. Presently, there is no solution – all tires contain this chemical.

ACSI recommends the County raise awareness among partners, and promote ways to reduce driving and tire wear through public health campaigns and continue to advocate the legislature.

## Nature is a living entity with rights

In ACSI's last letter to the Board, we recommended that the county explore granting legal recognition to nature as a living entity with rights. These rights reflect the growing recognition that our current economic and legal systems treat natural systems as resources to use and exploit. As a result, they are unable to successfully protect and reverse harm to nature.

Over three dozen communities in the US have passed laws protecting the rights of nature, including Everett, Washington recently providing legal rights to the Snohomish River. Multiple Tribal Nations have also passed laws and policies; and five countries on three continents have passed national laws. These rights have protected ecosystems and species, including Indigenous first foods, safety from toxic waste, and the right of rivers to flow.

ACSI recommends that the Chair direct the County Attorney's Office to conduct an analysis on the rights of nature, as recommended in the May 2024 ACSI letter. ACSI further requests that a member of the County Commission work with the Office of Sustainability to learn about this issue and explore a strategy to advance the rights of nature.

## **Transportation**

The ACSI transportation subcommittee met [insert] times in 2024. Similar to our recommendations of 2023, the County should use its stakeholder influence to provide input on transportation regional megaprojects to ensure they align with the County and ACSI's values. We believe these projects should be in pursuit of building a transportation system of tomorrow, including bold investments in public transit, understanding these initiatives are long-term assets that will serve future generations.

To encourage public transit usage, the County should continue to work with Tri-Met and local partners to reduce barriers to multimodal transit use and provide public education about these resources. This may include collaboration with community-based organizations who are working to increase the safety and walkability of neighborhoods, working with high schools to educate students and teachers about how to use transit, and exploring opportunities for providing Hop Cards to increase the uptake of transit.