

Dear Commissioners,

I support the adoption of the Multnomah County Climate Justice Plan.

In a time of global climate crisis, it's more important than ever to include climate planning into all decision making for Multnomah County.

The Climate Justice Plan represents a unique, standard-setting process of including community voices as qualitative data that pairs with quantitative data for a more complete, public health-focused approach on climate impacts, resilience, and justice & equity.

I urge you to adopt the Climate Justice Plan for a more resilient and responsible Multnomah County.

Sincerely,

Amy W

Dear Multnomah County Board of Commissioners,

My name is Ann [T] and I am a retired physician and a volunteer with Oregon Physicians for Social Responsibility. I am testifying in support of the Multnomah County Climate Justice Plan (CJP). As a physician, I worked with migrant and seasonal farmworkers, one of the many groups that are disproportionately impacted by a much warmer and more polluted climate.

We must stop burning things, including fossil fuels and wood. As journalist David Wallace Wells said "what we burn, we breathe." Burning things results in putting more CO2 and methane in the air, warming the planet. Burning fuels pollutes the air with nitrogen oxides, particulate matter and carcinogens like benzene. Burning fuels results in increasing the number of wildfires that pollute our air, destroy homes, devastate the environment and harm the health of front-line fire fighters. Air pollution, worldwide, accounts for almost 20% of all deaths. We now have inexpensive renewable energy sources solar and wind-that are less costly than fossil fuels, readily available, and provide a pathway to a truly just transition. Because of its transition to wind and solar, Australia has started providing free electricity to all Australians 3 hours every day! We can do this.

Here is my story. For me, the heat dome of 2021 was a wakeup call. My wife had just had knee replacement surgery 2 days before the heat dome. She developed a possible complication that meant we had to go to the ED during the heat dome. The ED was full, but finally she was taken into a room to be evaluated. I was told I would have to wait outside. I was 74 years old and it was 116 degrees F. It was brutal. Fortunately, all her tests were normal and we were able to go home where we were lucky enough to have a heat pump and, therefore, air conditioning. For the remainder of the heat dome, I kept thinking about all of those who were still in the ED that night that would go home to unlivable temperatures, including those who did not have a place to live and have no protection from the heat.

Multnomah County must continue to be a leader in environmental justice and pass the Climate Justice Plan to protect all of our communities from the devastation of the climate catastrophe. The plan was created by the people most impacted by the climate crisis, those who still suffer the most from heat and air pollution, i.e. people living without an adequate tree canopy, without air conditioning, without affordable energy. We need to be building a community with resilience, recognizing that climate justice is racial justice, economic justice, and health justice.

Please vote to adopt the Climate Justice Plan today.

Thank you for the opportunity to testify.

Ann T, MD

Community Warehouse supports the adoption of the Multnomah County Climate Justice Plan and commends the inclusive community engagement process that shaped it.

We are particularly grateful for the recognition of local reuse agencies-including Community Warehouse-as essential participants in the green workforce and circular economy. This acknowledgment reflects a fundamental truth: addressing climate change and addressing inequity are the same work.

For 25 years, Community Warehouse has proven that reuse-focused models can simultaneously:

- Lower material waste by diverting thousands of tons from landfills annually
- Build community resilience by ensuring neighbors have access to quality household goods and the accessibility to donate those goods
- Advance equity by serving families and individuals most impacted by systemic inequities people experiencing homelessness, refugees, domestic violence survivors

The Climate Justice Plan's recognition of reuse agencies in the green workforce validates what our community already knows: the most sustainable economic model is also the most just one.

We urge the Board to adopt this plan and commit to implementation that includes:

- Funding and support for local reuse organizations to expand capacity
- Integration of reuse agencies into climate, housing, and economic development initiatives
- Intentional partnerships that leverage reuse as both an environmental and equity solution

Community Warehouse is ready to partner with Multnomah County in bringing this vision to life. We've seen what's possible when climate action centers the voices and needs of frontline communities.

Thank you for leading with both ambition and equity. We are honored to stand with you as this plan moves forward.

Anna K

Executive Director, Community Warehouse

Dear Multnomah County Board of Commissioners,

My name is Annabelle [R], and I am the Advocacy Coordinator at Verde. I am submitting testimony in support of the Multnomah County Climate Justice Plan (CJP). The Climate Justice Plan for Multnomah County is a pillar for climate justice. In a time when extreme heat has led to deaths throughout the County every summer for five years, when winter ice storms leave communities stranded without heat and electricity, when marginalized communities face the brunt of toxic air pollution, the CJP envisions an optimistic future where resiliency is accessible and ensured for everyone, even our most vulnerable communities. Verde is extremely grateful to have engaged community members in the Cully neighborhood during the drafting process. Cully residents consistently grapple with poor air quality in comparison to other areas in Multnomah County. Several strategies laid out in the CJP target air quality at the intersection of other goals. For example, increasing the tree canopy improves air quality while also reducing extreme heat,

which is another issue close to Cully residents. Our local communities have shared their expertise and I encourage you to steer the County in a way that reflects community needs and values.

With almost 1500 engagement connections, the CJP sets a precedent for putting community benefits first. The Office of Sustainability staff were pivotal in flipping the script to co-create a climate justice plan that focuses on supporting our most vulnerable communities first. Collaborative governance is the only way we will see our way out of the climate crisis.

We believe in the thoughtful co-creation of this plan for the community and by the community, centering those most impacted by climate change. As the climate crisis worsens, so does our health, economy, and environment. This plan represents the community's most dire needs and clear path ways to address them. Multnomah county can't afford to sit idle while the lack of access to heat and cooling continues to put people at risk and erodes their quality of life. With a current lack of programs that prioritize climate justice, we need to get creative, so our communities can be more resilient. The Multnomah County CJP lays out concrete ways for both government and community to achieve climate justice for everyone. I strongly urge the board of commissioners to pass the CJP.

Thank you for the opportunity to submit written testimony.

Sincerely,

Annabelle R

I am so excited about the Climate Justice Plan. I strongly urge the board to pass it!

I am part of Extinction Rebellion PDX and I believe in climate justice. This plan is our best effort to achieve that.

WE are all — especially people in marginalized communities-already suffering due to climate change. The plan is a great way to build resiliency and lessen the impact of climate change.

It is also awesome that it was developed with input from people of color and people in the most impacted communities. Please approve this plan and put it to work ASAP.

Annie C

Dear Multnomah County Board of Commissioners,

My name is David [C], and I serve as Program Lead for the ZERO Coalition. On behalf of our coalition of nonprofits, businesses, local governments, community organizations, environmental justice partners, manufacturers, and energy service providers, I am writing in strong support of the adoption of the Multnomah County Climate Justice Plan.

The ZERO Coalition is committed to an equity-centered approach to building decarbonization across Oregon. We believe that addressing the climate crisis requires policies that reduce greenhouse gas emissions while improving affordability, resilience, health, and opportunity for all communities, especially those who have historically borne the greatest burden of pollution and climate impacts.

As the climate crisis worsens, Multnomah County residents are increasingly experiencing its effects firsthand. This year marks five years since the devastating Pacific Northwest heat dome, a tragic reminder that climate change is not a distant threat but a present reality affecting our neighbors, our economy, and our public health. Building resilient communities requires thoughtful planning and decisive action today.

The Multnomah County Climate Justice Plan provides a meaningful roadmap for achieving that vision. It recognizes that climate action and equity must go hand in hand and reflects years of collaboration with community members and organizations whose voices have too often been left out of decision-making. By centering frontline communities and advancing strategies that improve resilience, housing, health, and environmental outcomes, this plan demonstrates what effective and inclusive climate leadership can look like.

The ZERO Coalition works every day to bring together diverse partners to advance high-performance, healthy, and affordable buildings throughout Oregon. We know that lasting progress happens when governments, community organizations, industry, and residents work together toward shared goals. The Climate Justice Plan embodies that collaborative approach and provides a strong foundation for Multnomah County to continue leading on equitable climate action.

On behalf of the ZERO Coalition and our members, we respectfully urge the Board of Commissioners to vote in favor of adopting the Multnomah County Climate Justice Plan.

Thank you for your leadership and for the opportunity to provide testimony.

Sincerely,

David C

Oregon's Climate Resilience Superfund bill (Senate Bill 1541) passed out of committee but died in Ways and Means in the 2026 short session. A similar bill will be introduced in 2027. This bill, modeled on bills passed in New York and Vermont, requires the major fossil fuel producers to pay into a fund that cities, counties, and state agencies in Oregon can use to deal with the escalating costs of climate change and protect the health and well-being of our citizens. This is a taxpayer relief and jobs bill that will bring billions of dollars into Oregon so that Oregonians are not stuck with paying the whole amount. This bill will help implement the excellent Multnomah County Climate Justice Plan. What can Multnomah County do to support passage of a Superfund bill in the 2027 legislative session?

David P

I am Dr. Theodora [T], an environmental health scientist with a career in public health. I am a member of the Healthy Climate Action Team of Oregon Physicians for Social Responsibility and the Climate and Health Committee of the American Public Health Association.

I urge you to pass the 2026 Climate Justice Plan without delay. Climate disruption will not wait, and this plan has had extensive community input and it is an excellent framework for the County's work to address the climate emergency in a way that includes all of us. We have seen daily evidence of the harms, with heat domes and air quality alerts, reduced snowpack, increased wildfires, and increased costs. This Plan is a well thought out beginning, and we must begin without further delay. We all, as members of this community,

must begin now, as delay in responding to the climate crisis will only make it more difficult and costly to the life and health of this community. We will, with your leadership, find ways to get it done. But we must begin, now! Please vote yes on the 2026 Multnomah County Climate Justice Plan.

Thank you for your consideration of these concerns.

Dr. Theodora T

Dear Multnomah County Board of Commissioners,

I am a District 2 resident and a public-school substitute teacher. I strongly urge you to pass our county's Climate Justice Plan now. This week's smoke-filled air and dangerous temperatures remind us how directly we are impacted by the severe climate crisis. Yet at the county level, we have an opportunity to take meaningful action that will mitigate the impacts on our health, our environment, and our local economy into the future. I strongly believe that our children and every single county resident deserve to have clean, healthy air and water, and the resources needed to be resilient in the face of worsening climate conditions and increasingly frequent and severe natural disasters.

We cannot reduce the dangers and costs of climate change until we significantly cut fossil fuel use. How we structure our transportation systems and develop, maintain, and upgrade housing will determine whether greenhouse gas emissions will decline. I am fortunate to live in an all-electric building with rooftop solar panels, thanks to an innovative Portland Clean Energy Fund program. I look to our governments to expand such efforts that have been so positive for my own health and my ability to live within my means. I am unfortunate enough to be close to numerous industrial sources of pollution, and to see my options for getting around Portland car-free narrowing as TriMet cuts threaten a viable public transit system. I also worry as I watch water bill costs rise. Without affordable clean energy and water, and efficient public transit, I will be less able to put any disposable income into our local economy. Without meaningful action on curbing pollutants from wood and gas burning, from internal combustion engines and off-gassing car tires, and from industrial emissions, health care costs will rise for me and other older and vulnerable residents, as our public health systems are increasingly strained.

My support for this forward-looking Climate Justice Plan comes from more than concerns for my own health and finances, or even my hopes for my young students. I value the Plan for its emphasis on climate-related equity. The lives of all of us in the region are so interconnected, and our communities will thrive only when our elected and appointed officials act on the need to assess the impacts of all actions on our most vulnerable, least-resourced residents. Thus, I will be relieved, hopeful, and proud to see our County lead in the environmental justice we must prioritize to survive so many worsening threats. Do not waver in your support for the well-thought-out, smart, and essential strategies laid out in this plan. Vote it into reality today!

Thank you.

Sincerely,

Ellen H

Dear Multnomah County Board of Commissioners,

My name is Emily [S] and I am a parent and teacher. I live in the Jade District in SE Portland, and I am writing to testify in support of the Multnomah County Climate Justice Plan (CJP).

We feel the impacts of the climate crisis in our neighborhood in the form of extreme heat, wildfire smoke, and an added daily stress when we think about what kind of world our children are growing up in.

Having tangible actions we can take as individuals, as neighborhoods, and at the city and county level, takes the edge off that anxiety and turns despair into active hope. Concrete steps like planting and maintaining trees in public spaces, funding clean energy projects, and making public and active transit more practical options for everyone, are critical for building resilience.

I strongly urge the board of commissioners to pass the CJP.

Thank you for the opportunity to testify.

Emily S

Dear Multnomah County Board of Commissioners,

My name is Eva and I am a climate advocate and a Portland resident of 5 years. I am testifying in support of the Multnomah County Climate Justice Plan (CJP). As the climate crisis worsens, so does our health, economy, and

environment. We have seen the effects of heat waves on our community. We have seen how lack of shade trees impacts our East Portland neighbors. This is just one part of this huge crisis, and we have to be responsible for helping our earth and each other. I strongly support doing all we can to build resilience and contributing positively to this urgent global issue. The Multnomah County CJP lays out concrete ways for both government and community to achieve climate justice for everyone. I strongly urge the board of commissioners to pass the CJP.

Thank you for the opportunity to testify.

Eva T

I'm the Executive Director for Portland Fruit Tree Project, a nonprofit that cares for and harvests from fruit producing trees, vines, and shrubs in the Portland Metro area. We are thrilled to see Food included in the Climate Action Plan and are excited to see ways that the city will reach out to existing CBO's doing work in the food system. In addition to our robust food waste reduction and redistribution work, we are active and proud members of the Coalition to Advance Food Equity (CAFE) with several other impactful organizations who are all looking forward to a more robust food systems plan at the local level. Thank you for see the importance of food for the climate and for the people of our city.

Heather K

Dear Chair Vega Pederson and Commissioners Moyer, Singleton, Brim-Edwards, and Jones- Dixon,

I am writing to urge you to adopt and prioritize implementing the Climate Justice Plan. While not perfect, it will be a big step forward for resilience and public health.

We acutely felt the effects of the climate crisis the past couple of days as temperatures soared to around 100 degrees and in our third floor apartment in a brick building it felt much hotter than that. To survive and have a chance to thrive we need water available to hydrate and refresh ourselves; We need healthy food (which takes water and a stable range of temperatures and unpaved soil to grow); We need safe affordable housing with efficient heat pumps that can both heat and cool it. We need local clean electricity to power our efficient homes. We need to work together.

The Multnomah County Climate Justice Plan has strategies to support all of these needs and more. Also, it was put together with the most extensive community collaboration I've ever heard of in a plan like this. That is a good precedent.

Please vote to adopt the plan and then prioritize implementing it.

Thank you for the opportunity to comment.

Helena B, resident of Multnomah County D1

Dear Chair Vega Pederson, and Commissioners Moyer, Singleton, Brim-Edwards, and Jones-Dixon,

The Climate Reality Project Portland Chapter is a local, volunteer-led chapter of The Climate Reality Project, an international nonprofit whose mission is to catalyze global transition to clean energy, zero carbon transportation, climate justice and public health, green communities, and a fair, representative democracy. The Multnomah C implemented, it also will serve as a beautiful, cutting-edge example for other counties to follow.

Therefore, we urge you to formally adopt the Multnomah County Climate Justice Plan presented to you by the county's Office of Sustainability, that resulted from deep ar community and stakeholder meetings and other opportunities for Multnomah County residents to learn about the plan and weigh in. Though there are elements of the fin strongly support the plan's 12 goals and the process by which they were reached.

At this point, I'm sure we all agree that we need both adaptation and resilience- mitigation of the harms caused by climate change that is already here- and emissions re livelihoods, and the Climate Justice Plan in front of you addresses the whole scope as it pertains to Multnomah County. From the water that sustains our life by hydrating and the ways we get around and contribute to our community, the Climate Justice Plan contains important strategies to make Multnomah County healthier, more equitab Multnomah County a better place to live.

Thank you for the opportunity to comment.

Helena B, Interim Chair, Climate Reality Project Portland Chapter

Chair and Commissioners,

Thank you for the opportunity to testify today.

My name is Howard [B], and I serve as the Executive Officer and Secretary-Treasurer of OPEIU Local 11. Before I became a union leader, I spent thirty-four years working for NW Natural, beginning in 1989 and retiring as a Construction Foreman. I spent my career helping build, maintain, and operate the infrastructure that safely delivers natural gas to homes, businesses, hospitals, schools, and communities throughout Oregon.

Today, I represent workers whose livelihoods are connected to that same energy economy. Our members include employees at NW Natural, administrative professionals working for building and construction trade unions, employees of jointly administered health and welfare and retirement trust funds, credit union employees, and public sector workers. I don't come before you as someone opposed to climate action. I come before you as someone who believes we can reduce emissions while also protecting the people who have spent their lives serving Oregon.

Earlier this year I had the privilege of participating in the i-SUSTAIN study tour in Denmark and the Netherlands. I expected to see cutting-edge clean energy technologies. I did. But what left the greatest impression on me was something different.

I saw governments, utilities, labor organizations, engineers, researchers, and private industry sitting at the same table. They were not asking which workers should be sacrificed to achieve climate goals. They were asking how all workers could help build the next generation of energy infrastructure.

That is workforce justice.

5 MIN

Across Northern Europe, they are reducing emissions through a diverse portfolio that includes renewable electricity, renewable natural gas, hydrogen, biogas, district energy, waste heat recovery, efficiency improvements, and modernization of existing infrastructure. They are investing in new technologies while finding ways to use existing assets more efficiently. Most importantly, labor is treated as a partner in the transition.

When I returned to Oregon, I began reading our Climate Justice Plan through that lens. I found many important goals that I support. But I also found something missing.

I could not find a clear plan for the thousands of Oregon workers whose careers are built around the natural gas industry, and I did not see robust support (or understanding) for the innovations our industry is creating-I saw dismissiveness, lack of support, and in some cases fearmongering.

Climate justice should include the workers who helped build Oregon's energy system, and that includes skilled workers in the natural gas industry.

I respectfully ask the County to strengthen this Plan by making workforce justice a central part of climate justice.

I believe Oregon can lead on climate policy. And true leadership means reducing emissions while protecting the people who keep our communities running. It means building the future without abandoning the workers who built the present.

Climate justice and workforce justice are not competing values. They are strongest when they move forward together.

Thank you for your time, your service, and your consideration.

Howard B, Executive Officer / Secretary-Treasurer OPEIU Local 11

Please consider this as testimony to support the adoption of the MULTOMAH COUNTY CLIMATE JUSTICE PLAN.

Climate change or more correctly climate crisis is real.

Action is needed to help mitigate the very worse of - decades of inaction - the effects that our planet is already seeing.

At our regional and local level, we need to collectively do more.

So, pass the Multomah County Climate Justice Plan, please.

James M

The Oregon Trucking Association supports Multnomah County's goal of creating a healthy, resilient and prosperous future for all residents and recognizes the importance of climate-related challenges and your commitment to long-term environmental stewardship. However, we have serious concerns with the Climate Justice Plan in its current form. These concerns center on the lack of sufficient stakeholder engagement, critical economic and implementation analysis and inaccurate information. The plan establishes a framework that will influence County decisions affecting transportation, housing, energy, infrastructure, public health, economic development, workforce policy and governance. A document such as this should not move forward without rigorous technical review, transparent stakeholder engagement and a clear understanding of its economic, legal and operational impacts.

Throughout the development process a broad range of business interests participated in the meetings, listening sessions and public comment process in good faith. They raised substantive concerns concerning its implementation, infrastructure capacity, economic impacts, governance, legal authority, performance measures and accountability. Yet the revised draft reflects little evidence that these concerns influenced the final product.

The County has a stated goal of transparency and shared governance. Meaningful engagement requires more than accepting public comments. It requires demonstrating how feedback shaped policy decisions and an explanation of why significant recommendations were rejected. Unfortunately, that level of transparency did not occur during this process. It is concerning that this plan significantly affects affordability, economic competitiveness, investment, workforce development, energy systems, and public service delivery across the County. The plan does NOT include a comprehensive analysis of costs, legal authority, operational challenges, policy tradeoffs, or interactions with existing local, regional and state policies which is even more concerning. Additionally, the draft proposes an accelerated timeline with little opportunity for review of feedback.

The County has the opportunity to develop a stronger and more durable Climate Justice Plan but that will require additional engagement with stakeholders. For these reasons, we respectfully request that the Board postpone the adoption of this plan and direct staff to complete the necessary economic and legal analysis in order to provide a framework for a more meaningful stakeholder process.

Thank you for your consideration of our comments. We remain committed to working with the County to develop climate policies that will ensure a healthy and prosperous future for all.

Jana J

Dear Multnomah County Board of Commissioners,

My name is Jennifer [S] and I am the Education Director at the Columbia Slough Watershed Council.

I am testifying in support of the Multnomah County Climate Justice Plan (CJP).

I was born and raised in Portland and until recently was a resident of the Piedmont neighborhood for over 13 years. This summer, I have moved to Rose City Park. The Climate Crisis has made the city I grew up in feel unrecognizable in many ways - when I was a child, it was special if the summer highs got into the 80s, and WILD if it got into 90s. This city wasn't built for wave after wave of high heat. In the wet months, high winds and atmospheric rivers threaten our stormwater & wastewater systems, bring down trees weakened by extreme temperatures, and damage homes and community buildings. Flood risk, erosion, and habitat loss are all increasing each year as the Climate Crisis grows in intensity.

As the Education Director at CSWC, it is my job to partner with classroom teachers in Title I schools from Reynolds, Parkrose, and Portland Public Schools and work with their students on understanding their watershed and the communities that live in close proximity to industrial zoning, heat islands, and majority paved surfaces. Through my position, I see children who will benefit most from a Climate Justice Plan.

As the climate crisis worsens, so does our health, economy, and environment. We need to do all we can to build resilience. The Multnomah County CJP lays out concrete ways for both government and community to achieve climate justice for everyone. I strongly urge the board of commissioners to pass the CJP.

Thank you for the opportunity to testify.

Sincerely,

Jennifer S

Councilors: My family and I have lived in NW Portland for 70 years: and been passionate about our love and care for the earth that cares and nurtures us all.

We worked, marched, written letters, I taught my children the responsibility we have, having been granted the breath of life from the earth around us, the resiplicate responsibility of caring for this home.

We two legged creatures alone, among the rich diversity of life, have been granted the ability to choose whether to ensure our survival as a species, and I would ask each and every one of you: given that choice, what do you chose?

Jere G

Dear Multnomah County Board of Commissioners,

My name is Jessica [V]. I am a native Oregonian, the Managing Director of 350PDX, an active member of my Neighborhood Emergency Team, and a member of the Boise Neighborhood Association Board of Directors. I am writing to urge you, in the strongest terms, to adopt the Multnomah County Climate Justice Plan today.

I come to this from every angle I know: as someone whose roots in this state go back generations, as a leader in Portland's climate movement, as a neighbor who has trained to help my community survive disasters, and as someone helping steward the Boise neighborhood. From each of those vantage points, the conclusion is the same. We are far behind where we need to be, and the cost of that delay is measured in lives.

This month marks the fifth anniversary of the Pacific Northwest heat dome, which killed more than 500 people across our region a catastrophe scientists have tied directly to climate change. As a Neighborhood Emergency Team member, I know that when the next heat wave, wildfire smoke event, or ice storm comes, resilience is built long before the emergency arrives in our homes, our infrastructure, and the strength of our community networks. The Climate Justice Plan lays out concrete ways for both government and community to build exactly that resilience.

What makes this plan worth adopting is how it was built: from the ground up, in partnership with more than a dozen local climate and environmental justice organizations and the community members most affected by the climate crisis and decades of pollution. It moves at the speed of trust, not the speed of industry lobbyists. It recognizes that true resilience starts with justice - that climate justice is also racial justice, economic justice, and health justice. Hundreds of residents and more than fifteen organizations, 350PDX among them, have already voiced their support.

The community has done the work. The plan is ready. What remains is for this Board to act. Adopting the Climate Justice Plan is the right thing to do, and it is long overdue. I urge you to vote to adopt it today.

Thank you for the opportunity to testify.

Jessica V, Managing Director, 350PDX Neighborhood Emergency Team member

Dear Commissioners,

I support the adoption of the Multnomah County Climate Justice Plan.

At a time when the world appears to be on fire Multnomah County needs to step up and provide more resources to reduce the affects of global warming.

The Climate Justice Plan represents a unique, standard-setting process of including community voices as qualitative data that pairs with quantitative data for a more complete, public health-focused approach on climate impacts, resilience, and justice & equity.

I urge you to adopt the Climate Justice Plan for a more resilient and responsible Multnomah County.

Sincerely,

John H

As a parent watching my 10-yr-old child grow up in an increasingly unpredictable climate, I urge you to adopt the Climate Justice Plan today. Nine of her 10 summers have included times when it's been either too hot or too smoky to go outside and play. I never experienced this growing up, and it's really sad to explain to a young child why it's happening with such

frequency and intensity these days, to say nothing of her future. I'd love to be able to say, "But our region is doing everything it can." With this plan we get closer - it includes concrete actions at both the government and community level to build resiliency, reduce the worst impacts, and achieve climate justice for everyone. Please vote yes.

Kyla R Y

Dear Multnomah County Board of Commissioners,

My name is Laura Feldman and I am a community activist living on the North Portland Peninsula. I am testifying in support of the Multnomah County Climate Justice Plan (CJP) only because this plan comes from the county, a valuable partner engaged in livability issues benefiting all Portlanders including unhoused residents. I feel to date, Portland government leadership has been, for the most part, sorely lacking. As the climate crisis worsens, we need more than ambitious plans, we need action, as if we were in a crisis! which we are.

I live in Portsmouth neighborhood, just up the hill and slightly west of the Portland Parks and Recreation's Portland International Racetrack which continues to plague communities on the peninsula and has for years. When I sat down with the CJP I immediately went to Goals and Strategies: Air Quality and did not find what I needed to address being blasted by the track eight months out of the year with noise and lead pollution, event during times (last week) when there is wildfire smoke making it difficult to breathe. Residents here have worked on PIR pollution for years without any help from the city, county or state. However in 2024 Portsmouth neighbors, accompanied our Representative Travis Nelson, did have the opportunity to go Salem to urge the House Committee on Climate, Energy and Environment to ban leaded gas at PIR-HB2738. This track season we've been monitoring noise levels with PSU and OSU; and Kenton is doing outreach through a survey for neighbors impacted by the track. We are doing all that we can with very little support or even acknowledgment from local government.

If we are going to reach Net-Zero by 2050, pollution sources like this racetrack which belongs to the city. must be shut down. We, who have a lower life expectancy than any place else in the city -- demand this.

I strongly urge the board of commissioners to pass the CJP with one caveat-make it a real and living map for all.

Thank you for the opportunity to testify.

Sincerely,

Laura F

Please don't dilute our strong climate justice plan with unnecessary amendments or delays to let agencies & partners off the hook. Portland residents don't live in equal conditions and don't experience equal climate

justice. In my neighborhood of St. Johns we are contending with changes to nature preserve plans, management of contaminated industrial sites, and pollution. Other neighborhoods have totally different problems. We need a robust plan that acknowledges we don't all face the same challenges, but we ALL deserve EQUITABLE participation in this plan - The largest producers of pollution must make the greatest contributions to solutions. The most vulnerable to the effects of climate change must be prioritized.

Lawrence M

Dear Multnomah County Board of Commissioners,

My name is Mallory [P] and I am a 35-year resident of Multnomah County, a science educator, an urban canopy activist and steward and a long-time Elections worker. I am writing to testify in support of the adoption of the Multnomah County Climate Justice Plan (CJP).

Government power is a countervailing force to private interests. Government power is the public's major tool for securing environmental justice and equity. Both the process that created this document and its final form are examples of what government can and should do.

I strongly urge the board of commissioners to signal that they champion the role of government as an equitable partner in building climate resilience with the communities most impacted by it. We will all benefit from adopting the CJP.

Thank you for the opportunity to testify.

Sincerely,

Mallory J P

Adopt the climate justice plan

Thank you

Maria N

Dear Commissioners -

This bit, written by Emily Atkins, really resonated with me.

I have lived in Multnomah County since 1980, when I moved here to do my residency at OHSU in OB/GYN.

Summer here is just not the same as it used to be.

Please pass the Climate Justice Plan.

Another Summer Day, Stolen - by Emily Atkins.

"We are given only a limited number of truly perfect summer days in our time on Earth. One of the more insidious cruelties of fossil fuel greed is how it slowly strips those days from us, more and more throughout

our lifetimes, perhaps without us even realizing what we have lost. On a normal summer day like today, it might be pretty hot and maybe even a little hazy-but we might still be able to go for a bike ride or watch the dogs play at the park or stroll to the thrift store to terrorize our roommates with another stupid piece of home decor.

Instead, we are trapped inside, afraid to breathe, because a small, powerful group of polluting industries and their political allies spent decades lying about the problem and are still working, right now, to reverse what little progress has been made.

How many more summer days have to be stolen before we stop pretending this is natural? How many unprecedented disasters must be explained before the explanation is allowed to stick? How many times must scientists establish the same basic facts before we stop tiptoeing around the problem? What, exactly, are we still waiting to learn?"

Melanie P MD

Dear Multnomah County Board Clerk: Please share my support for the Climate Justice Plan. This plan represents years of collaboration between community organizations, environmental justice advocates, and local stakeholders, and outlines strategies to strengthen climate resilience while advancing health, equity, and environmental outcomes throughout Multnomah County. As a life long resident of the county who has a family member with a serious lung disorder, the quality of the air we breath is vital to our well being and the community at large. Thank you for your consideration.

Michael S

Dear Multnomah County Board of Commissioners,

My name is Olivia [B], and I've been a resident of Portland since June 2025. I moved to Portland last year in large part because of the community's commitment to resiliency and climate justice.

I grew up in Colorado and spent several summers on the Oregon coast. I chose to attend Pacific University in 2015 to stay close to the natural beauty and environmental values that have been meaningful all my life. I've felt summers get hotter, water become more scarce, and I worry about having a future that's habitable and enjoyable for everyone, especially as I consider having children in the future.

Oregon has some of the most ambitious climate and clean energy goals in the country. Passing the proposed Climate Justice Plan is a critical step toward ensuring that Multnomah County is taking necessary action to protect our communities and that the county remains a leader in climate and environmental action.

This plan reflects the input of hundreds of community members and more than 15 climate and environmental organizations. The scope of the Climate Justice Plan and its planning process make me proud to live and work in Multnomah County. Please vote to adopt the Climate Justice Plan today. Thank you.

Sincerely,

Olivia B

Thank you for this discussion on climate justice. All inhabitants of the tri-county area would benefit from limiting combustion engine idling by improving air quality. Everywhere I go there are people in vehicles with engines running while waiting for raised bridges, long trains, at drive through windows, making deliveries, or parked in vehicles while eating, texting, applying makeup, etc. If such idling was eliminated, our air quality would be improved even more than the reduction by changing to electric leaf blowers. Ideally educating people along the lines of "Slow the flock down", or the previous "Idling gets you nowhere" would begin to change people's awareness & limit pollution from idling engines.

Thank you for your time,

Paula L

Dear Multnomah County Board of Commissioners,

My name is Raine [W] and I am a sound engineer and professional musician. I am testifying in support of the Multnomah County Climate Justice Plan (CJP). As the climate crisis worsens, so does our health, economy, and environment. We need to do all we can to build resilience. The Multnomah County CJP lays out concrete ways for both government and community to achieve climate justice for everyone. I strongly urge the board of commissioners to pass the CJP. The future generations will thank you for any and all progress towards a greener and equitable future.

Thank you for the opportunity to testify.

Raine W

Dear Multnomah County Board of Commissioners,

My name is Rory [C]. I am a Portland resident and a teacher at PSU. I strongly urge the board of commissioners to pass the Multnomah County Climate Justice Plan (CJP). As the climate crisis worsens, so does our health, economy, and environment. We need to do all we can to build resilience. The Multnomah County CJP lays out concrete ways for both government and community to achieve climate justice for everyone.

Thank you, Rory C

Dear Multnomah County Board of Commissioners,

My name is Ruth [D] and I worked as a nurse in a safety net clinic for over 20 years. I am testifying in support of the Multnomah County Climate Justice Plan. If you have worked with the poor and the ill as I have you

see how much low income elderly poor families and people with serious illness suffer because they lack the resources most of us take for granted like air conditioning or air purifiers. I am proud of Multnomah County for the work they do to protect people during our ever more frequent climate events. I am thankful that the county offers people cooling stations. But the Climate Justice Plan helps people be protected in their own homes and apartments which is so much better. When you lack transportation or you are too frail or suffer an illness that keeps you at home cooling stations don't help much.

I think it is important to look at who supports the Climate Justice Program and who opposes it. The program was developed by the very people who suffer most in climate events. And people in the environmental movement support it not because we have anything to gain but because we have seen the suffering of everyone but especially the less fortunate in these climate events.

The groups opposed to it principally fossil fuel companies have something to gain financially by delaying or scaling back the program.

Yesterday I stayed indoors in my home with my heat pump keeping me cool and safe from the excessive heat. I live in an in-fill home that was built to be sustainable. It was not expensive yet it offers me power bills that are a quarter of what I used to pay. Homes like mine are homes of the future. Even those of us who are comfortable find our energy bills eating up more and more of our paychecks.

Climate events will become more and more common in the next decades. Let's not be like France and see thousands of people die when these events happen because their homes and communities have not adjusted to our changing climate.

Ruth D

Dear Multnomah County Board of Commissioners,

My name is Sasha [P], I am a former member of your Advisory Committee on Sustainability and Innovation with a background in climate policy. I am writing to share my support of the Multnomah County Climate Justice Plan (CJP).

County staff and their steering committee volunteers have done tireless work developing a community-driven plan to address the climate crisis, a challenging and important feat. Their deliberative process has taken a long time but they have created a roadmap to a cleaner, more just future that builds resilience for the current and future residents of Multnomah County and provides support for those who can't make the transition alone. It is expansive in the topics it covers because so many things in our lives will be impacted by climate change and lays out concrete directives for how both the county and community can act now to achieve climate justice. I strongly urge the board of commissioners to pass the CJP.

Thank you

Sasha P

Councilors -

We at Human Access Project fully support the efforts of the Multnomah County Office of Sustainability to create a comprehensive, inclusive, necessary and important Climate Action Plan. We encourage you to

adopt this plan. It addresses critical issues our County and region will be and are already facing due to increased temperatures. This plan is thorough and addresses numerous areas where the public will be negatively impacted from climate chaos. It is critical at this juncture that that we address head on the issues and solutions laid out in the plan. Especially for those who have historically been underserved and make up our BIPOC community. Special kudos to John Wasiutynski for bringing together NGO's, the public, government agencies and others to craft a comprehensive plan that Human Access Project supports Climate Justice NOW and doesn't kick the can down the road.

Scott F

Dear Chair Vega Pederson and Members of the Board: Dear County Commissioners,

The Western States Petroleum Association (WSPA) appreciates the opportunity to provide comments on the Multnomah County Climate Justice Plan (Plan). WSPA recognizes the significant effort that went into development of the document and supports Multnomah County's broader goals of improving public health, environmental outcomes, and community resilience.

WSPA is a non-profit trade association that represents companies that safely explore for, produce, refine, transport and market petroleum, petroleum products, natural gas and other energy supplies in California, Washington, Oregon, Nevada, and Arizona. Our members operate industrial facilities in Multnomah County and may become affected by the proposed plan.

WSPA previously commented on the draft Plan and emphasized that environmental and energy policies should be grounded in reliable data, proportional risk analysis, existing regulatory requirements, measurable outcomes, legal authority, and a careful evaluation of unintended consequences.

Although the Plan itself would not enact new regulatory requirements, its adoption would establish an official policy roadmap and direct future advocacy, research, and implementation efforts. The strategies should therefore accurately characterize existing conditions and avoid endorsing specific regulatory outcomes before the necessary technical, economic, equity, and legal analyses have been completed.

Air Quality and Proportionate Source Analysis

WSPA appreciates that the final Plan more directly recognizes residential wood burning as a significant source of particulate pollution and adds a strategy focused on maintaining the County's residential wood-burning curtailment program. This revision better reflects the importance of directing policy and resources toward sources that contribute meaningfully to local air-quality conditions.

As the County advances the remaining air-quality strategies, proportional source analysis should continue to inform policy development. Proposed approaches involving industrial facilities, freight activity, indirect-source rules, or land-use and siting decisions should be supported by reliable information demonstrating the contribution of the targeted sources and the expected air-quality benefits of the proposed action. The County should also account for existing state and federal permitting, emissions-control, monitoring, and operational requirements before determining whether additional local policies are warranted.

Hazardous Materials Risk Analysis and Emergency Response Funding

Strategy 2 relies substantially on the County's 2023 report, *The Risk of Earthquake-Induced Hazardous Materials Releases in Multnomah County, Oregon: Two Scenarios Examined*. The Plan cites modeled estimates many deaths and potential injuries from uncontrolled releases. At the same time, the Plan

acknowledges that much remains unknown about the extent of the threat, current industry practices, existing regulatory requirements, and risks in neighboring jurisdictions.

That acknowledgment is important. Modeled consequences based on selected scenarios should not be presented or treated as predictions of what will occur during an earthquake. The usefulness of modeling depends on the reliability of its assumptions, including assumptions about tank or container failure, release quantities and rates, the performance of containment and shutoff systems, chemical inventories, weather conditions, population location, evacuation, emergency response, and the likelihood that the modeled sequence of events will occur.

To the extent the modeled scenarios rely on extensive or concurrent failures of containment, prevention, and mitigation systems, the analysis should also account for existing facility safeguards, operating protocols, regulatory requirements, and emergency-response capabilities. Facilities operate under overlapping federal, state, and local requirements addressing prevention, inspection, maintenance, containment, monitoring, and emergency preparedness. Those measures should be reflected in the modeling rather than treated as though they would provide no protection during a seismic event.

The County should also clearly distinguish between consequence analysis and probabilistic risk assessment. A scenario describing what could occur under a severe set of assumptions does not establish how likely that outcome is. Presenting modeled casualty estimates without corresponding information regarding probability, uncertainty, and the expected performance of existing safeguards may create an incomplete understanding of the actual risk.

If the County intends to explore additional regulatory requirements, any future modeling should be developed through a transparent process that includes facility operators and professionals with relevant engineering, chemical-safety, emergency-response, toxicology, and regulatory expertise. Industry participation does not require the County to accept industry conclusions. It does, however, allow researchers to obtain more accurate information about facilities, operating

systems, applicable requirements, and the performance of prevention and mitigation measures.

Proposed hazardous-material storage fee

Strategy 2 also directs the County to work with state and local partners to explore a hazardous-material storage fee to fund emergency-response capabilities. The Plan further suggests that such fees may be used to encourage facilities to substitute alternative materials.

WSPA supports ensuring that local emergency responders have appropriate training, staffing, and equipment. Potential fees on hazardous materials may have unintended consequences on consumers and businesses. The proposed fee as outlined in the Plan may be considered a tax and should follow the proper public process and be funded through the county budget process.

Maintaining Access to Transportation Fuels During the Transition

Strategy 4 recognizes that Oregon is in a period of transition in which conventional vehicles, electric vehicles, and other transportation technologies will continue to operate alongside one another. The Plan also recognizes the need to maintain access to fueling stations while alternative infrastructure is developed. Despite that acknowledgment, Strategy 4 recommends consideration of a prohibition on new gas station development.

However, the Plan does not establish that the transition has progressed to a point where new fueling infrastructure is no longer needed. Multnomah County residents, businesses, commercial fleets, emergency responders, and public agencies continue to rely on liquid transportation fuels. Although the composition of the vehicle fleet may change over time, the pace of that change will depend on vehicle turnover, affordability, charging availability, electrical capacity, housing conditions, and consumer needs.

Restricting the development of fueling infrastructure does not eliminate the underlying demand for fuel. As existing stations close because of redevelopment, property transactions, environmental remediation, or business conditions, a prohibition could prevent replacement facilities from being developed in areas where fueling needs remain. Restricting retail fuel stations may come at the expense of energy affordability and availability for consumers. With the absence of robust uptake of alternatives, reducing the number of retail fuel stations may lead to higher fuel prices for consumers. Economic research indicates a correlation with the number of retail fuel stations within a defined geographical region and retail fuel prices (Dallas Federal Reserve Working Paper (2025)). Fewer retail fuels stations within a region are related to relatively higher prices for consumers compared to regions with a greater number of retail stations. (Dallas Federal Reserve Working Paper (2025)). Future facilities may provide conventional fuels, renewable fuels, electric-vehicle charging, and other services at the same location. Prohibiting new development would reduce the flexibility needed to replace aging or poorly located facilities with more modern infrastructure and could leave communities dependent on an increasingly constrained network before alternative technologies are sufficiently available to meet demand.

Before recommending such a restriction, the County should evaluate whether the existing network can continue to provide adequate geographic access as individual facilities close and transportation patterns change.

Conclusion

WSPA appreciates the County's efforts to address complex public-health, environmental, and community-resilience issues through the Plan, as well as the revisions reflected in the final Plan. As implementation moves forward, the County should prioritize approaches that are supported by reliable data and robust modeling, produce measurable benefits, complement existing regulatory programs, and account for broader infrastructure, economic, and community impacts. Adoption of the Plan should not be understood as approval of any specific regulatory requirement, funding mechanism, land-use restriction, or other policy concept identified within its strategies. Those concepts should be considered independently through appropriate technical analysis, legal review, intergovernmental coordination, stakeholder engagement, and public process.

If you have any questions regarding our comments, please contact me directly at [phone number] or via email at [email].

1. Dallas Federal Reserve Working Paper (2025): The Effects of Competition in the Retail Gasoline Industry - Research Dept. Working Paper No. 2509 - Dallas Fed

2. Dallas Federal Reserve Working Paper (2025): The Effects of Competition in the Retail Gasoline Industry - Research Dept. Working Paper No. 2509 - Dallas Fed

Sincerely,
Sophia S C

Dear Multnomah County Board of Commissioners,

My name is Tania [N] and I am a doctor working in community health in the Portland Metro region and a resident of Multnomah County. I am testifying in support of the Multnomah County Climate Justice Plan (CJP). As the climate crisis worsens, so does our health, economy, and environment.

Tomorrow starts another heat wave. I've only lived here since 2001, but people here before me tell me it never got this hot in Portland in July as recently as the 1980s. Many of my patients are outdoor workers - people who work in the fields who are high risk from severe adverse health effects of heat and air pollution during fire season (which also is hitting us for the first time this year tomorrow). Many of them don't speak English, but any number of them might have picked food you ate today. I'm here to testify on their behalf as well. I remember the horror of the pandemic heat dome very well. My clinic had to convert our pandemic urgent care room into an emergency cooling shelter for our patients!

Did you have to think about wearing a mask outside, check the AQI, or think about how to keep your home cool and free of smoke before you left for work today? What an apropos day for you to vote on this issue! We have a chance to do the right thing for our kids and the coming generations who will live with the effects of our action or our inaction on climate.

We need to do all we can to build resilience. The Multnomah County CJP lays out concrete ways for both government and community to achieve climate justice for everyone. I strongly urge the board of commissioners to pass the CJP.

Thank you for the opportunity to testify.

Tania N

Dear Chair Vega Pederson and Commissioners:

The Working Waterfront Coalition is a coalition of industrial businesses concerned about the economic vitality and the environmental health of the Portland Harbor. The WWC advocates for sound public policy that promotes environmental, social, and economic sustainability in supporting harbor and industrial businesses that are key to the economic vitality of Portland. Our members fabricate metal, build and repair ships, move people and goods, and power our region. Our collective commitment to ensuring our community is healthy guides us, as does our support for family wage jobs that sustain Portland's economy.

We are writing regarding the Board's review of the Climate Justice Plan. We, as representatives of businesses in one of the most sustainable regions in the U.S., appreciate the intent behind the proposed Plan and the focus on equity and frontline communities.

However, the draft plan did not address the concerns we raised over a year. The following are serious concerns regarding the technical feasibility, narrow engagement process, and ultimately, the ability to implement this Plan in a way that not only achieves its goals, but ensures we continue to support the kinds of jobs and economic growth our region needs:

1. Idealistic Goals are Unimplementable

The Plan outlines 12 goals: clean energy, fossil fuels, air quality, transportation, housing, and more. Unfortunately, the plan lacks rigorous technical pathways, baseline analysis, funding strategies, or performance metrics.

2. Alignment with other Climate Plans

This Plan is presented as a standalone product; there is passive reference to integration with the established regional climate and infrastructure plans such as the City's 2015 Climate Action Plan and the County's Pathways to 100% Renewable by 2050. This disconnect creates the potential for duplicative regulations and inconsistent metrics, to name a few items. To ensure consistent timelines, performance measures, and jurisdictional roles, the draft Plan must align with city, regional and state climate frameworks - including the

Portland Clean Energy Fund, Metro's climate action planning, the Oregon Department of Energy's Oregon Energy Strategy, the Climate Protection Program, and HB 2021 clean energy mandate.

3. Banning Future Fueling Sites is Not the Right Approach

It is understandable to want to address the environmental issues linked to old, abandoned gas stations. But newer stations are built to higher safety and environmental standards and typically serve communities where demand still exists. A ban could inadvertently limit access without achieving the intended environmental outcomes.

4. Seismic Retrofit Mandates Lack Focus and Feasibility

A one-size-fits-all requirement to retrofit every piece of equipment involved in the storage or distribution of liquid fuels from large-scale tanks to individual home gas meters is not realistic. Effective resiliency planning should prioritize risk-based assessments, not blanket mandates.

5. Full Fossil Fuel Elimination Goal is Out of Step with Broader Policy Landscape

The proposed 2050 fossil fuel phase-out raises serious implementation questions. Any plan with such far-reaching goals must account for how it will affect local employers, consumers, and energy systems and consider whether it aligns with state and federal policy direction.

6. Limited Participation by Key Stakeholders

—

The process has moved forward without adequately engaging or acknowledging the input from regulated entities or Portland's broader business sector. WWC has a history of willingness to work with the County on important issues affecting our members. But when a process is not open and transparent, or our input is ignored, the end product is lacking critical perspectives.

7. Ignores Economic Consequences

The Plan fails to evaluate the economic ramifications to all the proposed aspects Climate Justice Plan. The County is currently faces a challenging budget cycle which may continue beyond this year. We urge you to lead a responsible evaluation of a proposed public policy, including an objective assessment of the economic and social costs of each of the proposed initiatives.

Thank you for your attention to these critical considerations. We appreciate the opportunity to comment and look forward to continued collaboration.

Sincerely,

Tanya H, Executive Director Working Waterfront Coalition

Dear Multnomah County Board of Commissioners,

last two days of extreme heat and smoky air should be enough to prove the point that we needed to start taking care of our environment yesterday but the second best option is now.

With many programs and services being cut, prices of everything going up, we are seeing that politicians and people with influence, in this city and many cities across this country, are choosing profit over people, over humanity, over morals, and over our planet. The select few are deciding our destiny and it's destroying our planet and the most vulnerable people pay the price for that first. We're seeing it in many places in the world that displace people after a natural disaster.

The decisions we make today will affect generations into the future.

I am testifying in support of the Multnomah County Climate Justice Plan (CJP). As the climate crisis worsens, so does our health, economy, and environment. We need to do all we can to build resilience. The Multnomah County CJP lays out concrete ways for both government and community to achieve climate justice for everyone. I strongly urge the board of commissioners to pass the CJP.

Thank you for the opportunity to testify,

Valeriya S, SEIU 503 steward and resident in zip 97202



22 July, 2026

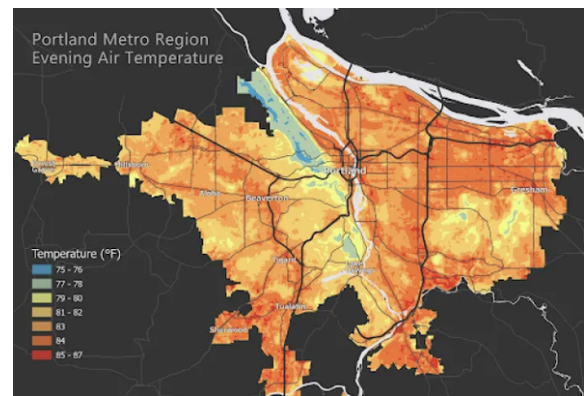
Dear Multnomah County Board of Commissioners;

350PDX Forest Defense Team members strongly encourage you to adopt the [Multnomah County Climate Justice Plan](#). At a time when basic rights, freedoms, and values of mutual care, health and well-being are under threat, this plan lays out a path forward that can guide crucial County and community investments in the years ahead.

We believe that street trees are critical public health infrastructure, which residents in many neighborhoods currently lack. The Shade Equity Coalition was formed after the deadly 2021 heat dome to increase access to the healing benefits of publicly-owned street trees in Portland. Together, we advocate for changes in design standards, policies, programs and public funding.

The 2023 tri-county heat mapping study revealed that Multnomah County residents experience some of the hottest evening temperatures in the region. (Right)

The Climate Justice Plan articulates many of the strategies necessary for reducing local heat islands: tree preservation, care, planting, establishment maintenance, workforce training, and public education are all critical aspects of expanding tree canopy. Learn more about our work at 350pdx.org/shade-equity



Street trees are multi-solvers. As such, they are connected to several CJP goals: health & wellbeing, wealth & jobs, clean air, water, transportation, and resilience. They help people adapt to- and mitigate greenhouse gasses by shading buildings, reducing air temperatures & enhancing comfort so people are more apt to roll and stroll. More importantly, trees improve maternal health outcomes, heart health and reduce stress.¹ They are the only form of infrastructure that appreciates in value through time, delivering ever-increasing benefits to surrounding neighbors.

We believe that Multnomah County residents will benefit from the Climate Justice Plan framework, to help organize cross-sector efforts that retrofit all of our neighborhoods for climate, neighbor-to-neighbor, block-by-block.

Thank you for your leadership in setting the County on a course of climate justice and resilience!
Sincerely,

Felice Kelly
On behalf of the
350PDX Forest Defense Team

¹ Dr. Geoffrey Donovan, <https://www.ashelmconsulting.com/>

Shade Trees & the Multnomah Climate Justice Plan

The following goals and strategies align with 350PDX Forest Defense and Shade Equity Coalition work to cool neighborhoods with street tree protection, planting, and care.

Goal: Every community member has access to the resources and underlying conditions that promote health and well-being.

Goal: Every community member is resilient to extreme weather events and other climate threats.

Goal: Every community member is surrounded by and connected to nature, parks, and green infrastructure.

Strategy: Prioritize tree planting in low canopy neighborhoods.

- Fund tree planting in low tree canopy neighborhoods and develop strategies for maintaining trees in the public right of way in high priority areas.
- Look for partnership opportunities where the County can help to catalyze focused tree planting efforts in high need neighborhoods, like the Green Gresham, Healthy Gresham project.
- Implement Action 1 - Heat Resilience Focus Areas - from the 2025 Multnomah County Climate and Health Resilience Plan.
- Work with the Multnomah County Department of Community Services to develop street tree planting and maintenance strategy for County owned right of way.
- Continue to monitor disparities in tree canopy distribution.

Strategy: Develop innovative approaches to providing shade and outdoor refuge from heat.

Goal: Every community member has access to wealth-building opportunities and green jobs.

- Build career pathways into clean energy and green manufacturing by removing structural barriers for communities historically excluded from the trades.
- Develop a Youth Climate Corps that provides young people (ages 16–24) with paid work experience, job readiness skills, green job exposure, and direct pathways into highly skilled green jobs.



22 July, 2026

Dear Multnomah County Board of Commissioners;

The 350PDX community of climate justice organizers strongly supports the adoption of the [Multnomah County Climate Justice Plan](#), an innovative roadmap to guide community and County toward climate justice, equity and resilience for years to come. 350PDX board, staff, and members have actively participated in the plan's comment periods and goal-specific forums; it aligns with our organization's vision, values, and [strategic priorities](#). The Climate Justice Plan provides critical leadership, and clear direction for public and community resilience efforts during the crucial years ahead. We appreciate the following attributes of the CJP:

Authentic Public Process: This plan is a departure from other planning work that has taken place in the region. It started by centering community priorities for long-term health and well-being, rather than consultants or staff taking public input after a draft is created (much of which is never incorporated into the plan).

In-depth Vetting: After the comment period, Sustainability Office staff led a round of hybrid forums for each of the goals. These were well-attended by both community members and public/private sector stakeholders. This was followed by another public comment window.

Holistic Approach: Many climate plans separate environmental metrics from the well-being of people. The CJP flips the indicators of success; we know we're on track when everyone has clean air, freedom from the dangers of fossil fuel infrastructure, and has access to nature, affordable clean energy, and shelter.

Setting the Table for Partnership: The County does not have the authority or capacity to carry out all the strategies in the Plan. Yet, all of the strategies are necessary. We appreciate the keys on each page that helps readers understand who has ownership, the kind of work required, and how much control/influence the County has for implementing the strategy.

The goal of the Climate Justice Plan is that every community member is safe from the risks posed by fossil fuels and energy infrastructure. We believe it is the multi-solving framework that Multnomah County residents need to help organize cross-sector efforts to engage, organize, and support the many communities who call this special place home.

Thank you for your leadership in setting the County on a course of climate justice and resilience!

Sincerely,
350PDX Board of Directors



July 22, 2026

Dear Multnomah Board of Commissioners,

Re: Support for Multnomah County Climate Justice Plan

Breach Collective is a 501(c)(3) organization based in Portland and Eugene, which builds power within the climate and labor movements through organizing, legal advocacy, education, and storytelling. We write in support of the Multnomah County Climate Justice Plan (CJP), and strongly urge its adoption at the July 23, 2026 Board Meeting.

Although we were not involved in the initial drafting of the Climate Justice Plan, we have been involved in the lengthy feedback and revision process that has occurred since the draft was released. We have been impressed by the ability of the Multnomah County Office of Sustainability to incorporate feedback from a diverse set of stakeholders, including the at-times conflicting opinions and perspectives from those stakeholders. The result of this work is a revised plan that sets a strong roadmap for justice-oriented climate action in the County, with policies and strategies that are consistent with and underpinned by other local, state and regional climate and energy plans, foremost among which is the Oregon Department of Energy's Oregon Energy Strategy.¹

We write additionally to respond to complaints from a number of stakeholders, foremost among which is gas utility NW Natural, that the Climate Justice Plan was somehow procedurally deficient for not more closely involving stakeholders from fossil fuel and fossil fuel-adjacent entities. This is an absurd proposition. Any policy process purporting to be a "Climate Justice Plan" plan must abide by the foundational principle of centering the most vulnerable and impacted groups; this was precisely the approach

¹ Oregon Department of Energy, *Oregon Energy Strategy* (Nov. 2025), <https://www.oregon.gov/energy/Data-and-Reports/Documents/Oregon-Energy-Strategy.pdf>

taken by the Office of Sustainability. More broadly, the environmental and climate justice movements arose in response to the dominant influence that polluting industries have exercised – historically and into the present – over regulatory and policy processes. The notion that corporations such as (Working Waterfront Coalition members) ExxonMobil, Chevron, Sunoco, Phillips 66, Kinder Morgan and NW Natural, or the Portland Metro Chamber, should have been able to exercise more influence over the Climate Justice Plan, or that their employees are capable of offering technical expertise to the county independent of those corporations' fiduciary interests, should be rejected out-of-hand.

Sincerely,

Danny Noonan
Climate, Energy & Labor Strategist
Breach Collective

ON BEHALF OF THE 119 UNDERSIGNED CONSTITUENTS

Submitted by Amy Rathfelder, NW Natural

July 20, 2026

Multnomah County Commissioners
501 SE Hawthorne Blvd
Portland, OR 97214

RE: 2025 Multnomah County Climate Justice Draft Plan (the "Plan")

Dear Commissioners:

We appreciate the County's continued focus on climate resilience, environmental stewardship, and protecting vulnerable and frontline communities from the impacts of extreme weather and climate-related disruption. That said, we are deeply concerned about the lack of affordability and economic impact analysis, as well as technical accuracy and completeness of the Plan.

I stand with fellow community members who share concerns that the County has not taken adequate steps to ensure that the draft Climate Justice Plan's goals and strategies are viable, accurate, and the most affordable or reliable options. The County's Plan should take into account costs for residents and businesses and consider the unintended consequences of restricting access to reliable heating sources during the coldest months for our most vulnerable residents and increasing the already rising cost of living. Multnomah County is facing an affordability crisis for residents and businesses, and the Climate Justice Plan in its current state stands to worsen this affordability crisis while not effectively addressing carbon reduction. Additional work is needed on the draft Plan:

1. Deeper engagement of technical stakeholders and Subject Matter Experts ("SMEs").
2. Technical, feasibility, and economic impact analysis and implementation planning for Multnomah County constituents and businesses.
3. With regard to energy systems, additional foundational information on resource adequacy within energy systems and energy efficiency opportunities.

Finally, County leaders should prioritize a diversified energy system as fundamentally better, more affordable and more reliable and work with statewide energy experts before putting forward a Plan that includes unfortunate impacts on energy systems and Multnomah County residents.

Signed, (see attached)

Jo Ann Andrews
Portland, OR 97214

Tom Calabrese
Portland, OR 97219

Dennis Dunning
Gresham, OR 97080

Aundra Asmussen
Troutdale, OR 97060

Eric Carlson
Portland, OR 97212

Roy Englund
Portland, OR 97220

John Bakkensen
Portland, OR 97239

Michael Chan
Portland, OR 97219

Katy Felton
Portland, OR

Jennifer Banbury
Portland, OR

David Chown
Portland, OR 97220

Frank Filice
Portland, OR 97215

Ancuta Bec
Portland, OR 97216

Don Cook
Gresham, OR 97080

Jose Flores
Troutdale, OR 97060

Veronica Bec
Portland, OR 97216

Cinzia Corio-Holman
Portland, OR

Bruce Fossati
Portland, OR 97202

Thomas Becker
Portland, OR 97233

Russell Cornelison
Gresham, OR 97080

Sherry Frost
Portland, OR 97233

Harriet Bing
Portland, OR 97214

Tom Curtin
Portland, OR

Marcia Garland
Portland, OR 97219

Jess Blankenship
Gresham, OR 97080

Lindsay Dees
Portland, OR 97206

Irene Gilbertson
Portland, OR 97213

Russell Bohanon
Gresham, OR

George W. Delmore
Portland, OR 97203

John Glanz
Portland, OR 97211

Robert Boyd
Portland, OR 97216

Greg Delwiche
Portland, OR 97212

Taylor Gray
Portland, OR 97221

Suzy Brander
Portland, OR

Bryan Drysdale
Portland, OR 97266

Joanne Grenz
Portland, OR 97206

Jay Breidenbach
Portland, OR 97214

Douglas Dunford
Gresham, OR 97080

Russell Grenz
Portland, OR 97206

Thomas Buxton
Gresham, OR 97080

John Dunn
Portland, OR 97219

Brent Gunderson
Portland, OR 97213

Douglas Hagen
Portland, OR 97212

Joanne Hall
Portland, OR 97219

Debra Hansen
Gresham, OR 97080

James Harding
Gresham, OR 97080

Charlotte Hasson
Portland, OR 97217

Stephen Hill
Gresham, OR 97080

Mary Beth Horton
Multnomah County
97035

Darrell Hungerford
Portland, OR 97217

James Hunt
Portland, OR 97219

Alberto Ibarra
Gresham, OR 97080

Diane Inda
Portland, OR 97236

Andrew Jansky
Portland, OR 97239

Robert Jarrett
Portland, OR 97210

John Perenta
Portland, OR 97236

James Kehoe
Portland, OR 97210

Kevin Kevin Martinez
Portland, OR 97230

Tom Kloos
Portland, OR 97239

Christopher Kroeker
Portland, OR 97219

Jerry Kryszek
Portland, OR 97219

Renee Laren
Portland, OR 97211

Anna Larson
Portland,, OR 97230

Brian Lawrence
Portland, OR 97216

Russell Leabo
Gresham, OR 97080

Nesa Levy
Portland, OR 97206

Qinghua Li
Portland, OR 97266

Scott Mayes
Portland, OR 97206

JoNell McClary
Gresham, OR 97080

Keith McIntyre
Portland, OR 97221

Holly Mecalis
Portland, OR 97206

Ben Miller
Portland, OR 97217

Cathleen Miller
Portland, OR 97202

Kenneth Miller
Portland, OR 97202

Dale O'Neill
Portland, OR 97230

Richard Patton
Portland, OR 97266

Erik Pearson
Portland, OR 97213

Devi Petersen
Gresham, OR 97080

Douglas Quayle
Portland, OR 97217

Andrew Ridenour
Portland, OR 97203

Steven Schaefer
Portland, OR 97230

John Seifert
Gresham, OR 97030

Seth Shikora
portland, OR 97215

Matthew Silva
Portland, OR 97206

Alex Simpson
Portland, OR

Eric Terhaar
Portland, OR 97213

Diane Whitney
Gresham, OR

Deborah Sipe
Portland, OR 97202

Karl Thompson
Portland, OR 97206

Jason Wilson
Portland, OR

Alan Smart
Portland, OR 97220

Greg Tibbles
Portland, OR 97205

Ronald Wright
Gresham, OR 97080

Victoria Smolinsky
Portland, OR 97215

Dale Tonagel
Portland, OR 97217

Diane Wymer
Portland, OR 97236

John Sorensen
Portland, OR 97218

Don Toussaint
Portland, OR 97213

Jessica Zahnow
Portland, OR 97210

Phillip Sterle
Portland, OR 97266

Dayton Turner
Portland, OR 97266

David Zeps
Working in Portland,
living in Metro area

Tim Stevenson
Portland, OR 97230

Laurel Turner
Portland, OR 97266

Keira Zimmerman
Portland, OR 97202

Rod Strand
Portland, OR 97266

Holly Van Fleet
Portland, OR 97202

Scott Swanson
Portland, OR 97230

Lyle Vandestreek
Portland, OR 97215

Cielle Swatland
Portland, OR

Susan Vandestreek
Portland, OR 97215

Bill Symes
Portland, OR

Jeffrey George Wade
Portland, OR 97223

Laura Symes
Portland, OR

Claudia Walker
Portland, OR 97202

John Tarpey
Portland, OR

Theresa Weber
Portland, OR 97206

Erik Teose
Portland, OR 97239

Libbey White
Portland, OR 97202



June 1, 2026
Multnomah County Board of Commissioners
501 SE Hawthorne Blvd.
Portland, OR 97214

RE: NW Natural's Comments on the Updated Climate Justice Plan

Chair Vega Pederson and Commissioners,

Thank you for the opportunity to provide comments on the updated draft Multnomah County Climate Justice Plan (the "Plan"). NW Natural appreciates the County's continued focus on climate resilience, environmental stewardship and protecting vulnerable and frontline communities from the impacts of extreme weather and climate-related disruption.

As a utility provider serving hundreds of thousands of homes and businesses across the region, NW Natural recognizes that achieving Oregon's long-term emissions reduction goals requires thoughtful planning, strong partnerships, and durable investments across multiple sectors. We also recognize that energy systems, housing systems, transportation systems, and public health outcomes are increasingly interconnected. We support continued collaboration toward practical, equitable, and effective climate solutions.

At the same time, we remain concerned about many aspects of the County's draft Plan and do not believe it is ready for adoption. We have seen no evidence that the County has undertaken the level of broad technical stakeholder engagement, systems modeling, or economic impact analysis necessary to support adoption of a framework of this complexity and scale. Instead, the Plan reads as a loose, arbitrary, and ultimately unfunded compilation of advocacy positions, not a governance document. Specifically, we believe additional work is necessary in the following areas:

1. Deeper Engagement of Technical Stakeholders and Subject Matter Experts ("SMEs")

The County's emphasis on incorporating historically underrepresented voices into climate planning is important and appropriate. Also, a viable climate framework must also include a foundational collaboration with operational stakeholders responsible for maintaining and implementing the systems directly affected by the Plan and directly supporting the community's needs.

Utilities, infrastructure providers, manufacturers, labor and workforce organizations, freight operators, housing providers, engineers, and technical experts were not meaningfully engaged during the development of the Plan's energy and infrastructure-related strategies. These strategies have largely not changed over the last year. Several proposed strategies are not connected to operational realities, implementation timelines,¹ permitting constraints, workforce availability, infrastructure limitations, and existing regulatory structures.² Additionally, some strategies just have incomplete information. Climate planning cannot succeed through advocacy perspectives alone. Effective policy decisions and implementation require collaboration with the entities responsible for delivering reliable and affordable energy, maintaining critical infrastructure, and ensuring public safety during extreme weather events and emergencies. We encourage the County to convene a formal technical and operational stakeholder table prior to adoption of the Plan.

Additionally, we are concerned by the lack of transparency surrounding the development of the draft Plan in both its first iteration and this new draft. **NW Natural submitted public records requests seeking additional information regarding stakeholder engagement and the development of the Plan's recommendations and strategies; the fulfillment of these requests remains incomplete. On June 19, 2025, we submitted an initial request and were told it would cost \$17,500 for access to the requested public documents. We then sent clarifying requests on October 6, 2025 and November 19, 2025, and still have not received a full response to a request for what we believe represents general public documentation that is regularly made available in a municipality's undertaking of this kind (see Exhibit A). No date has been provided for the County's anticipated fulfillment of the request.** Without the County's response to the records request, we lack sufficient clarity on how major policy recommendations were developed, what technical analysis informed them, or how differing stakeholder perspectives were evaluated. This is a surprising lack of transparency from a government agency charged with being a convener. The lack of fulfillment of the records request further reinforces the need for appropriate technical work on the Plan prior to adoption.

2. Lack of Technical, Feasibility, or Economic Impact Analysis and Implementation Planning

The draft Plan includes numerous, ambitious strategies related to forced electrification, energy affordability, infrastructure transformation and resilience. However, to our

¹ Examples are included but not limited to the following pages in the PDF Plan: 3, 4, 7, 22, 87, 88, 90, 100. We can provide more details of specific examples once we have access to public records that can help us understand the derivation of the Steering Committee's advocacy around the development of the Plan.

knowledge, the process has not included technical feasibility analysis, cost estimates, economic impact analysis, or systems modeling. In a time when the County is already struggling to close a significant budget deficit, we continue to be concerned that many of the Plan's proposed strategies remain aspirational rather than actionable, leveraged, and with the kind of return on investment our community expects. We remain unsure of how public staff intend to address particularly cost-heavy action items and initiatives.

3. Jurisdictional Coordination and Governance Clarity

Several proposed strategies fall outside of the County's authority and instead implicate state regulatory structures, utility ratemaking, regional energy planning, and statewide infrastructure policy. To our knowledge, there has been minimal coordination between the County and exterior agency and government partners, and in certain cases the language is inaccurate and lacks appropriate context for leaders to make informed decisions about the use of limited financial resources—both the County's funds and customer's finances. Clear delineation between County authority, advocacy priorities, and external regulatory processes is necessary to avoid confusion, duplication, and conflicting policy direction.

- An example is found in the “Support Policies to Ensure Utilities Use Ratepayer Funds in the Public Interest,” strategy of the Plan, which inaccurately implies that NW Natural is using ratepayer funds for lobbying. This is untrue. NW Natural does not seek recovery on its lobbying hours, which are submitted to the Public Utility Commission (our regulator) at their request during rate cases. We are unclear what this section is trying to accomplish with its continued disconnection from the PUC standards for the utilities they regulate. Additionally, and conversely, we are unaware of the amount of time spent by Office of Sustainability staff on advocacy versus governance, and would like to see a scoped percentage and a financial breakdown in accordance with this Plan.

1. Additional Information on Resource Adequacy and Energy Efficiency

The Plan ignores well-documented regional energy provider's concerns about the electric grid's ability to handle an increase in demand. Resource constrained systems are vulnerable to blackouts, leaving residents without power until the system can be restored. With projected energy need growth in the Pacific Northwest, the Western Interconnection will need to add dispatchable resources to help the electricity supply match pace with demand. Electrification exacerbates the demand on the electricity grid, increasing the risk of power outages. Direct-use of natural gas in communities helps lessen the demand on the electricity grid and provides resiliency features during blackouts and extreme winter weather—like allowing families to shelter-in-place and still have warmth from natural gas

fireplaces, continuing to be able to cook on natural gas cooktops, and many natural gas water heaters can continue to provide hot water.² To help create a more resilient and sustainable energy future, utilities should be involved in Climate Action Planning/Climate Justice Planning, allowing for different perspectives and knowledge to be shared between groups and a pathway to the future to form. To help further the understanding of the energy future of the Pacific Northwest, NW Natural recommends reading the Pacific Northwest Utilities Conference Committee (PNUCC) and the Northwest Gas Association (NWGA) report³, as well as the Energy & Environmental Economics' Report⁴. Both reports come to similar conclusions, our electricity grid is constrained and increasing demand will lead to a gap between the supply of electricity and the demand. NW Natural recommends adding the two reports to the Climate Justice Plan, so readers can understand the constraints and opportunities of both energy systems.

In addition to the constraint forced electrification would put on the electricity grid, NW Natural has concerns regarding the recommendation for fuel switching. There seems to be confusion that fuel switching is equivalent to energy efficiency, which is incorrect. Energy efficiency is the act of making equipment and buildings operate as efficiently as possible, whereas electrification and fuel switching is merely switching the energy burden and emissions to another fuel source. Electrification is not the same as decarbonization.

NW Natural is proud to support energy efficiency in both households and businesses. Our customer dollars help fund our Oregon Low Income Energy Efficiency (OLIEE) program and Energy Trust of Oregon's energy efficiency programs for gas equipment. OLIEE has a proven track record of helping our most vulnerable customers receive valuable energy efficiency and health and safety⁵. Energy Trust of Oregon's energy efficiency programs fund upgrades to equipment and structures to aid in lowering energy use and costs for customers. Energy Trust of Oregon's multi-year plan as approved by the Public Utility Commission means our customers are paying more than they ever have for energy efficiency as a portion of their bills. In contrast, fuel switching could lead to unintended consequences for Multnomah County residents. Compared to the cost⁶ those of natural gas. Between the cost of new equipment and the increased monthly energy bill, fuel

² [Natural gas in a power outage - NW Natural](#)

³ [Guidehouse analysis of regional energy reports 2025](#)

⁴ [E3-NW-RA-Final-Report_040826.pdf](#)

⁵ Over the last four years, the Oregon Low Income Energy Efficiency (OLIEE) program funding has served 507 income-qualified households in Multnomah County alone through energy efficiency upgrades and health and safety measures. More than \$8 million has been invested directly into these homes. Based on a recent impact evaluation, participating households are achieving average energy bill savings of 16-19%.

⁶ <https://www.aga.org/news/news-releases/doe-announces-natural-gas-affordability-jumps-to-3-5-times-more-affordable-than-electricity/>

switching becomes financially burdensome and does not always lead to emission reductions.

A critical approach to decarbonization starts with understanding the interdependencies between the electric and gas systems. The draft Plan does not reflect any understanding of these interdependencies nor have we received any outreach from Staff that indicates there is interest in engaging in this level of technical analysis or discussion. NW Natural is committed to decarbonizing our system while keeping affordability, reliability, and resiliency in mind.

NW Natural remains committed to providing County residents with an affordable and reliable energy service as we have done for over 165 years. The scope and the significance of the proposed strategies in the Plan should be considered by a more comprehensive stakeholder and technical review process, as well as an independent economic impact analysis prior to final consideration. Such a process will allow the County to be a leader and a convener in building a stronger framework through deeper collaboration, applied and credible technical analysis, and more thorough long-term planning. We appreciate the opportunity to provide comments and look forward to engaging in the future.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy Rathfelder". The signature is fluid and cursive, with the first name "Amy" and last name "Rathfelder" clearly distinguishable.

Amy Rathfelder

Community and Government Affairs, Multnomah County

NW Natural

EXHIBIT A: PUBLIC RECORDS REQUEST DOCUMENTATION AROUND CLIMATE JUSTICE PLAN DEVELOPMENT

June 2025: Initial submission of public records request

Dear Amy Rathfelder:

Multnomah County acknowledges receipt of your Public Records Request. For requests received outside of normal business hours -- 8:00 am to 5:00 pm PST, Monday through Friday, excluding public holidays -- this request is considered received on the first business day following the County's receipt of your request. Your request was submitted to this office on 6/19/2025 and given the reference number M000072-061925 for tracking purposes.

Records Requested: I respectfully request copies of all public records in the County's possession related to the development of the 2025 Draft Climate Justice Plan. This request is intended to be comprehensive and includes, but is not limited to, the following categories of documents: 1. Steering Committee Materials - All meeting agendas, minutes, notes, and materials presented or discussed by the steering committee. - Any documentation of promotion, outreach, or facilitation for public workshops related to the Plan. - Any copies of a public engagement strategy or plan used to guide the community engagement process. 2. Technical and Informational Materials - Any information (including technical documents, data, memos, or summaries) shared with the steering committee by Multnomah County staff or consultants. 3. Government Stakeholder Engagement - Documentation identifying which individuals or departments from each "Government Organization" listed in the Targeted Strategies section (pages 33-87) were consulted. - All feedback or input provided by these organizations, including dates and formats of feedback (written, verbal, and/or meeting-based). 4. Review and Analysis Methodology - Records describing the County's process for evaluating proposals including in the Targeted Strategies, such as: Economic feasibility analysis, cost-benefit or trade-offs analysis, equity assessments and/or reliability considerations. Thank you in advance for your attention and consideration in delivering these records. If possible, the records should be delivered in digital format. Please reach out to me if any part of this request is unclear, or would benefit from clarification to expedite your response. I am happy to discuss it further.

At this time, the County is uncertain whether it is the custodian of the requested record. The County will review your request to determine if it has responsive records. The County will then gather an estimate of the costs to provide copies of requested public records for which the County does not claim an exemption from disclosure. The County is permitted to charge its reasonably calculated actual costs to provide records. Fees include research time to locate and analyze the requested records, even if no records are located or if the requested records are determined to be exempt from disclosure.

You can monitor the progress of your request at the link below. Thank you for using the Multnomah County Public Records Center.

Sincerely,
Multnomah County
Communications

Log into the [Public Records Center](#) to review or update this request.

August 2025: County orders payment of \$17,500 to fulfill request:

RE: Public Records Request of June 19, 2025, Reference # M000072-061925

Dear Amy Rathfelder,

Multnomah County received a public records request from you on June 19, 2025. You requested the following: I respectfully request copies of all public records in the County's possession related to the development of the 2025 Draft Climate Justice Plan. This request is intended to be comprehensive and includes, but is not limited to, the following categories of documents: 1. Steering Committee Materials- All meeting agendas, minutes, notes, and materials presented or discussed by the steering committee.- Any documentation of promotion, outreach, or facilitation for public workshops related to the Plan.- Any copies of a public engagement strategy or plan used to guide the community engagement process. 2. Technical and Informational Materials- Any information (including technical documents, data, memos, or summaries) shared with the steering committee by Multnomah County staff or consultants. 3. Government Stakeholder Engagement- Documentation identifying which individuals or departments from each "Government Organization" listed in the Targeted Strategies section (pages 33-87) were consulted.- All feedback or input provided by these organizations, including dates and formats of feedback (written, verbal, and/or meeting-based). 4. Review and Analysis Methodology- Records describing the County's process for evaluating proposals including in the Targeted Strategies, such as: Economic feasibility analysis, cost-benefit or trade-offs analysis, equity assessments and/or reliability considerations. Thank you in advance for your attention and consideration in delivering these records. If possible, the records should be delivered in digital format. Please reach out to me if any part of this request is unclear, or would benefit from clarification to expedite your response. I am happy to discuss it further.

After reviewing your request you are required to pay a \$17,500 fee before the County will begin processing this request. If the actual cost is less, you will receive a refund. If the cost is more, you must pay the full amount due prior to accessing the documents.

If you would like to narrow the request you submitted that could reduce the estimated cost.

Please send payment to:

Multnomah County
Attn: Record Custodian
501 SE Hawthorne Blvd., #600
Portland, OR 97214

Sincerely,
Multnomah County

October 2025: NW Natural submits an updated records request:

Dear Amy Rathfelder:

Multnomah County acknowledges receipt of your Public Records Request. For requests received outside of normal business hours -- 8:00 am to 5:00 pm PST, Monday through Friday, excluding public holidays -- this request is considered received on the first business day following the County's receipt of your request. Your request was submitted to this office on 10/9/2025 and given the reference number G000039-100925 for tracking purposes.

Records Requested: I respectfully request copies of all public records in the County's possession related to the engagement process with external stakeholders in the development of the 2025 Draft Climate Justice Plan. After several conversations with County staff and confirmation from the Board of Commissioners, it is clear there was an extensive engagement process between Multnomah County and members of the Steering Committee as well as specific members of the public invited to the engagement processes' public meetings. This engagement process (as outlined from pages 21-25 of the draft Climate Justice report and as specifically highlighted on page 13 of the Sept 18, 2025 Commission presentation) was not shared transparently with the broader public at the time it was happening, and newly engaged stakeholders need to have the same information that was shared previously in order to appropriately engage the next part of the process now. Therefore, we would expect that documentation from a public engagement process will now be made available to stakeholders and interested members of the public alike at no cost. Again, we are specifically requesting those items employed in the engagement process, including but not limited to: all information provided by the County and resulting from "workshops, webinars, open houses, informational meetings" like meeting agendas, meeting notes, public surveys/survey results, visuals and technical information provided during past public meetings/open houses, documentation of the promotion of the public meetings). We ask for the documentation as soon as possible as the County has scheduled a new set of public forum based on the past engagement process but newly engaged stakeholders have not yet been allowed to review past engagement process materials.

At this time, the County is uncertain whether it is the custodian of the requested record. The County will review your request to determine if it has responsive records. The County will then gather an estimate of the costs to provide copies of requested public records for which the County does not claim an exemption from disclosure. The County is permitted to charge its reasonably calculated actual costs to provide records. Fees include research time to locate and analyze the requested records, even if no records are located or if the requested records are determined to be exempt from disclosure.

You can monitor the progress of your request at the link below. Thank you for using the Multnomah County Public Records Center.

Sincerely,
Multnomah County

October 21, 2025: County directs NW Natural to general Climate Justice Plan website; NW Natural acknowledges receipt but notes that this is not sufficient fulfillment of original request, as the website does not include developmental and public meeting materials:

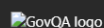
Hi, Amy.

Denis Theriault here, from Communications. The Office of Sustainability has created a public website on their engagement work, with links to materials that fit within the list of specific types of records your request describes. It's at <https://multco.us/info/developing-climate-justice-plan>.

Do the materials included within satisfy your request? I'm asking because the latter part of the request is specific, whereas the initial language mentions "all records," which would be seeking records not described in the list in the last paragraph.

Thanks!
DT

Log into the [Public Records Center](#) to review or update this request.



November 2025: Request is held while the Communications Office coordinates with the Sustainability Office

RE: Public Records Request of October 09, 2025, Reference # G000039-100925

Dear Amy Rathfelder,

Multnomah County received a public records request from you on October 09, 2025. You requested the following: I respectfully request copies of all public records in the County's possession related to the engagement process with external stakeholders in the development of the 2025 Draft Climate Justice Plan. After several conversations with County staff and confirmation from the Board of Commissioners, it is clear there was an extensive engagement process between Multnomah County and members of the Steering Committee as well as specific members of the public invited to the engagement processes' public meetings. This engagement process (as outlined from pages 21-25 of the draft Climate Justice report and as specifically highlighted on page 13 of the Sept 18, 2025 Commission presentation) was not shared transparently with the broader public at the time it was happening, and newly engaged stakeholders need to have the same information that was shared previously in order to appropriately engage the next part of the process now. Therefore, we would expect that documentation from a public engagement process will now be made available to stakeholders and interested members of the public alike at no cost. Again, we are specifically requesting those items employed in the engagement process, including but are not limited to: all information provided by the County and resulting from "workshops, webinars, open houses, informational meetings" like meeting agendas, meeting notes, public surveys/survey results, visuals and technical information provided during past public meetings/open houses, documentation of the promotion of the public meetings). We ask for the documentation as soon as possible as the County has scheduled a new set of public forum based on the past engagement process but newly engaged stakeholders have not yet been allowed to review past engagement process materials.

Thank you for responding to our email from 10/21. I need to speak with Sustainability regarding the additional questions you are asking. Can you please specify what exactly you are still looking for regarding records? I want to make sure I do not miss anything.

Sincerely,
Multnomah County
Communications

June 2026: Still awaiting fulfillment of original request

Multnomah County Board of Commissioners
501 SE Hawthorne Blvd.
Portland, OR 97214
July 23rd, 2026

RE: Comments on Multnomah County's Proposed Climate Justice Plan

Chair Vega Pederson and Commissioners Moyer, Singleton, Brim-Edwards, and Jones-Dixon,

Thank you for the opportunity to provide feedback on the Multnomah County Climate Justice Plan (the "Plan"). In existence since 1859, Northwest Natural Gas Company, dba NW Natural ("NW Natural") is a local distribution company (LDC) that provides natural gas service to roughly 2.5 million people in Oregon and SW Washington.

As an energy utility and community partner, NW Natural shares the County's commitment to addressing climate change, building resilience, and supporting vulnerable communities. NW Natural has long supported the development of programs that effectively and equitably meet the State's greenhouse gas emission reduction goals while preserving affordable, reliable energy upon which our region and customers depend. While we appreciate the effort reflected in the Plan, we believe several important policy, technical, and implementation considerations have not been fully addressed. To help inform the County's deliberations, we offer the following background information and comments for your consideration. Our concerns are not limited to the examples outlined below, which are intended to be illustrative rather than exhaustive. We also encourage the County to consider the comments NW Natural submitted previously on June 1, 2026, which remain unaddressed in the Plan in its current form.

Reliability and Resiliency

Numerous strategies in the Plan call for support of electrification (buildings or fleets), even calling for Energy Trust of Oregon to support fuel switching to explicitly support electrification without regard to resource constraints and resiliency. NW Natural and other regional energy providers have concerns about the grid's ability to handle an increase in demand. Attached to this letter is an analysis¹ performed by the Pacific Northwest Utilities Conference Committee (PNUCC) and the

¹ [Guidehouse analysis of regional energy reports 2025](#)

Northwest Gas Association (NWGA) evaluating the resources adequacy issues the region faces. Resource-constrained grid systems are vulnerable to blackouts, leaving residents without power until the system can be restored.

The independent study released by Energy + Environmental Economics (E3) entitled *Resource Adequacy and the Energy Transition in the Pacific Northwest* furthers and supports the critical need for the county to consider electricity grid resource constraints and resiliency needs in the Plan2. E3 highlights near-term reliability risks and long-term portfolio optimization, factoring in the policy landscape of the Pacific Northwest. The E3 report comes to a similar conclusion to the PNUCC report: the PNW is quickly approaching a situation where the demand for energy will not pace the supply. To help create a more sustainable and resilient energy future, joint energy planning between electric and gas utilities should occur. NW Natural recommends that the Plan includes the E3 and PNUCC reports, so readers can understand the opportunities and constraints of the system.

With the increase of AI and data centers moving to the Pacific Northwest, the Western Interconnection will need to add dispatchable resources to help the electricity supply keep pace with demand. Electrification furthers the demand on the electricity grid, increasing the risk of power outages, while direct-use natural gas in communities helps lessen the demand on the electricity grid and provides resiliency features during blackouts.

A critical approach to decarbonization starts with our understanding of the interdependencies between the electric and gas systems. Both systems are affected by extreme weather and how utilities plan for peak. Decarbonization is not the only critical outcome of energy planning; both energy systems need resiliency and resource adequacy as well.

Joint System Planning

While NW Natural supports joint system planning between electric and gas utilities, the Plan inverts it. The Plan's strategy states its conclusion first, limiting the gas system, then enlists joint planning to justify that conclusion. Integrated planning works the other way. It tests all resources on equal footing and lets the results identify the least-cost, least-risk pathway to meet reliability, affordability, and emissions objectives. The Plan asserts that electrification delivers customer savings, emissions reductions, and equity benefits, but it shows no analysis to support those claims. It does not quantify

² [E3-NW-RA-Final-Report_040826.pdf](#)

the costs imposed on the electric system and electric customers, the impacts of load growth, the range of customer circumstances, or the investments required to maintain reliability.

A proper approach does not begin with preferred outcomes. It evaluates all supply and decarbonization strategies on equal footing and allows the economics lead. Our objection is not that electrification carries costs; every strategy does. Our objection is that the County never measured those costs. Households that switch to electricity can face energy costs up to 3.5 times those of natural gas customers.³ Add the cost of new equipment to a higher monthly bill, and fuel switching becomes a financial burden that does not guarantee lower emissions given the physical and economic characteristics of Oregon's electricity system.⁴

A sound economic analysis of joint system planning values reliability and emissions outcomes on both systems, not gas alone. The goal should always be to provide affordable, reliable service to customers while decarbonizing, not the advancement of a single fuel or technology. By measuring only the gas side, the Plan uses joint system planning to advance electrification rather than to test which pathway serves customers best. It does not demonstrate that its preferred approach is the lowest-cost, most reliable, or most equitable way to meet its stated objectives.

The Plan also invokes a *just transition* without defining what makes the transition just. NW Natural supports a just transition driven by policy and analysis of the impacts on the people who bear the costs of change, while structured to keep vulnerable communities from being left worse off. Assessing that burden means looking at the whole system, and the Plan looks at only part of it. It does not say how it will measure affordability, reliability, customer energy burden, housing quality, equipment costs, or future electric rate impacts, and it assumes electrification advances justice without showing that it does. Focusing that assessment on the gas side alone gives the County an incomplete picture of who bears the cost. Before the County commits residents to this path, it should show how they will be protected from higher costs and reduced reliability, rather than assume the outcome is fair.

Decarbonizing the Natural Gas System

³ [DOE Announces Natural Gas Affordability Jumps to 3.5 Times More Affordable Than Electricity - American Gas Association](#)

⁴ [Energy : Oregon Electricity Resource Mix : Energy in Oregon : State of Oregon](#)

Within the Plan, the Climate Protection Program (“CPP”) and its counterpart for the electricity system, HB2021, are discussed in different lights. The programs have the same goal, decarbonize the energy system, but the presentation of material within the Plan disregards the options to decarbonize the natural gas system, questioning cost-effectiveness and availability of resources. In contrast, the Plan notes that HB2021 will drive electricity emissions lower without any reservations about needed technological advances or cost and uses that as justification for electrification. It appears that the Plan incorporates these two rules unequally in the analysis and policy recommendations. By only considering emissions reductions from HB2021—and furthermore treating them as givens—the Plan misframes the energy sector and draws conclusions based on an unbalanced view of the future.

The Plan questions cost effectiveness of low carbon gaseous fuels but lacks questions regarding costs associated with implementing renewable electricity. In 2026, only 7 years after receiving approval from the Legislature to procure it, NW Natural is blending 4% renewable natural gas into their supply. While in comparison, it has taken decades and many government subsidies for Oregon’s electricity mix in 2024 to reach 3.9% of the generation from solar. The County should not pick and choose decarbonized energy sources when all resources are needed to achieve our collective emissions reduction goals.

Seismic Safety

Emergency preparedness at home is important to all of us. At NW Natural, we work with regional partners to strengthen emergency response. Underground, we’ve upgraded our pipelines with flexible materials to better withstand seismic activity and have installed hundreds of thousands of Excess Flow Valves (EFVs) which are devices that automatically closes and restricts the flow of natural gas if an underground gas line breaks or is completely cut. Above ground, NW Natural is currently modernizing gas meters at homes and businesses, adding another layer of safety to our system and our gas control room is staffed 24/7—and backed up by a second facility for added security.

We encourage customers to take additional steps to keep their households safe and ensure their natural gas appliances are ready for emergencies. One device that exists and that anyone can purchase is an earthquake shut-off valve. Earthquake shut-off valves sense ground movement or shaking and shut off the flow of gas automatically. This could mean the device is triggered by shaking from ground movement or accidentally by normal activities around it (e.g. the device being bumped with a basketball). NW Natural can’t install, maintain, service or reset an earthquake shut-

off valve. A licensed contractor has to install it on one's houseline on the meter, not on the service line or within the "meter set assembly" installed and maintained by NW Natural.

At the County's Fossil Fuel Forum in December of 2025, NW Natural provided information on our seismic safety work on pipelines, meter modernization, and more. We appreciate that some new information was added to the most recent draft on page 114 as a result. However, after we provided information, it does not appear the original assumptions in this Plan's strategy were reviewed. Further, it does not appear more technical research was completed by Staff. Specifically, on current page 114, the Plan states "Add seismic safety valves to residential and commercial natural gas connections" and further down on the page, this is described as something the County wants to advocate as a *requirement* for all NW Natural customers.

NW Natural asks questions of the staff's research to better understand the County's proposed mandate:

- What research from other jurisdictions who have reviewed the question of mandating this device did the County review?
- What federal and state pipeline safety regulations did the County review in the context of seismic safety improvements did the County review?
- What is the estimated cost of the device the County proposes requiring?
- What is the estimated cost of installing the device?
- How will the installation mandate be enforced? Who does this enforcement and what is the cost of enforcement?
- What are the costs to the customer and the utility when the device is accidentally triggered?
- What are the opportunity costs and tradeoffs of choosing to mandate a fragmented approach to seismic monitoring as opposed to a comprehensive utility-driven approach?
- If safety is the County's highest priority, how was the electricity system reviewed in the case of seismic activity and household and community safety?

Our concerns and questions around the County's assumptions and advocacy are based on reality for our customers. For example, since 2019 we have alerted over 500 customers notifying them that we needed to perform work on their meter because their shut-off valve (sometimes called an earthquake valve or EQV) was installed incorrectly by their contractor.

Further, the Plan's strategy focuses on a fragmented safety system with a customer-added device for homes that have natural gas, and it does nothing to review the safety of the electricity system. There are well-known methods like burying power lines that would make roads safer and the electricity system more resilient for communities in extreme weather. We are increasingly concerned that the County's approach to climate planning is not based on technical characteristics of energy systems, the costs of addressing risks in those systems, or objective views of best pathways forward, but instead, a poorly informed and anti-resiliency animus to natural gas.

Conclusion

As we stated earlier, our concerns about the Plan's technical accuracy are not limited to the examples outlined above and our comments are intended to be illustrative rather than exhaustive. Our team will continue to track the progress of this Climate Justice Plan, and we are happy to provide any additional data needed to create the most effective plan for the residents of Multnomah County. Additionally, if the Multnomah County Climate Justice Project Team has any questions or would like to learn more about our decarbonization efforts and system safety, we are happy to provide more information. For any questions, please contact Amy Rathfelder, Amy.Rathfelder@NWNatural.com; Mary Rudolph-Knobbe, Mary.Rudolph@NWNatural.com; or Andrew Sprott, Andrew.Sprott@NWNatural.com.

Sincerely,

Andrew Sprott
Director
Integrated Resource Planning

Mary Rudolph-Knobbe
Environmental Policy Analyst

Amy Rathfelder
Community & Government
Affairs



July 22, 2026

Chair Vega Pederson and County Commissioners
Multnomah County
501 SE Hawthorne Blvd
Portland, OR 97214

Re: Multnomah County's Climate Justice Plan (2026)

Chair Vega Pederson and County Commissioners,

Thank you for the opportunity to comment on the County's Draft Climate Justice Plan.

Portland General Electric, Pacific Power, and NW Natural share the County's goals of improving community resilience and ensuring all residents have access to safe, reliable, and affordable energy. We appreciate the effort that has gone into developing this Plan and recognize the importance of addressing the climate, equity, and public health challenges facing Multnomah County communities. We also applaud the County's commitment to advancing transportation options, expanding access to green space, and reducing wealth inequality, while improving housing options, food security, and community health outcomes through this Plan.

While the Plan identifies a broad range of priorities, we encourage the County to further evaluate how the proposed actions connect with and build upon existing programs, investments, and planning efforts already underway throughout the region. Given our shared commitment to affordability, resilience, and emissions reductions, it is important to understand how the Plan's proposed strategies would complement existing initiatives and what potential cost implications they may have for residents, businesses, and utility customers.

Many of the energy-related objectives discussed in the Plan align with programs and investments that are already being delivered through utilities, Energy Trust of Oregon, local governments, and other partners. These efforts include energy efficiency programs, weatherization services, customer assistance programs, distributed energy resources, and other initiatives designed to reduce energy burdens while advancing state and local

climate goals. Evaluating how existing programs are contributing to the Plan's objectives could help identify opportunities to leverage current investments, avoid duplication, and maximize the impact of available resources.

As utilities serving Multnomah County residents and businesses, we recognize that affordability remains a central concern for customers and communities. We therefore encourage the County to consider how proposed actions may interact with existing regulatory frameworks, long-term utility planning processes, and ongoing customer programs. A clearer understanding of implementation pathways, funding considerations, and potential customer impacts is needed to help ensure that any future actions advance shared climate and resilience goals while maintaining a focus on affordability, reliability, and equitable outcomes.

We believe there is a real opportunity to build on the strong foundation of programs and partnerships already in place. By assessing where current efforts are already advancing the Plan's goals and identifying remaining gaps, the County can help ensure that future policies and investments are coordinated, effective, and responsive to community needs. As potential strategies are considered, the County should also evaluate the associated costs and resource requirements to help prioritize investments, identify opportunities for efficiency, and ensure that implementation is financially sustainable over the long term.

We appreciate the opportunity to provide these comments and encourage the County to conduct additional analysis regarding costs, funding mechanisms, customer impacts, and expected outcomes before advancing many of the Plan's recommendations. A stronger understanding of these issues will help ensure future actions appropriately balance climate objectives with affordability, reliability, and fiscal responsibility. As utilities, we are committed to maintaining safe, reliable, and affordable service, and we believe careful consideration of customer cost impacts is essential to the long-term success of any climate strategy.

We encourage the County to engage with utilities, subject matter experts, and other stakeholders as staff refines this policy to ensure practical, informed solutions. We welcome the opportunity to provide technical expertise and serve as a resource throughout the process through on-going stakeholder engagement opportunities.

Thank you for your consideration,

Bob Gravely
Regional Business Manager
Pacific Power

Preston Korst

Local Government Affairs

Portland General Electric

Amy Rathfelder

Community & Government Affairs, Multnomah County

NW Natural

July 22, 2026

To the Multnomah County Commission:

After reviewing the final draft of the Climate Justice Plan (CJP) I would like to offer the following comments. I very much appreciate the time and effort that the County has devoted to this plan. These are critical issues for our community and require our immediate attention. I will comment primarily about the air quality chapter of the county's draft CJP and address both the plan's strengths and weaknesses in regards to our most pressing air pollution and climate warming problem, diesel particulate matter (DPM). Please take my remarks as friendly amendments to a well-researched, vetted, and comprehensive CJP.

DPM is the single most dangerous air pollutant in Portland for several reasons:

- We have a lot of it: Multnomah County has consistently ranked among the worst 1% of counties nationwide for toxic levels of DPM.¹
- It's uniquely toxic: DPM consists of a carbon core to which cling hundreds of organic chemicals, heavy metals, and other air toxics, including at least 40 known carcinogens, which, when inhaled, are carried deeply into the lungs and absorbed into the bloodstream.²
- It's everywhere: DPM is widely dispersed in our community emanating from both mobile and non-mobile sources.
- It's a killer: Every year in Oregon DPM causes an estimated 400+ premature deaths.³
- It's costly: DEQ estimates the DPM results in economic losses of \$2.26 billion (in 2026 dollars) statewide from health care costs and lost productivity.⁴
- It's a potent contributor to global warming, which according to one authoritative source, is second only to CO₂.⁵

DPM from non-mobile sources (industrial installations) is also an environmental justice concern, with disproportionate effects on BIPOC, low income, and immigrant communities. Houseless communities on the inner westside and eastside urban core are particularly vulnerable. At greatest risk of all are drivers of diesel-powered vehicles (trucks, buses, barges, trains) and dock and rail workers, people who are increasingly from BIPOC communities.

I was pleased to see that the plan:

- recognizes diesel particulate matter (DPM) as a major source of harms to public health.
- acknowledges that current air quality regulations fall short in reducing those harms.

¹ Portland Clean Air. 2023. "Mapping Diesel Particulate in Portland Neighborhoods."

<https://portlandcleanair.org/files/reports/MiniWRAS%20report.pdf>

² California Air Resources Board. "Summary Diesel Particulate Matter Health Impacts."

<https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts>

³ Oregon Department of Environmental Quality. 2015 (revised). "The Concerns about Diesel Exhaust."

<https://www.oregon.gov/deq/FilterDocs/DieselEffectsReport.pdf>

⁴ IBID

⁵ Bond, T., et al. 2013. "Bounding the role of black carbon in the climate system: A scientific assessment." *Journal of Geophysical Research: Atmospheres*. <https://agupubs.onlinelibrary.wiley.com/doi/full/10.1002/jgrd.50171>

- includes strategies to enhance community involvement, which is a growing and largely untapped resource.
- proposes to investigate the use of indirect source rules to reduce emissions from traffic hubs, like the CEI Hub, that are currently largely unregulated.

I am concerned that the plan:

- does not include strategies to specifically monitor levels of DPM and map patterns of dispersion.
- does not include investigation of zero or low emission zones as proven strategies to reduce DPM.
- fails to recognize that reductions in DPM as a Short-lived Climate Pollutant (SLCP) could lead to rapid reductions in its climate warming effects.

Monitoring and Mapping DPM

The CJP proposes to monitor air pollution through the EPA's Air Quality Index (AQI). The AQI is calculated from airborne levels of ⁶:

- ground-level ozone
- particle pollution (also known as particulate matter, including PM2.5 and PM10)
- carbon monoxide
- sulfur dioxide
- nitrogen dioxide

Measuring ambient levels of DPM is a tricky business. While the AQI is a good measure of overall air quality, it is not an accurate measure of DPM. 90% of DPM is 1.0 micron or less and is only one type of particulate matter detected by PM2.5 monitors, which also detects gasoline exhaust, wood fire smoke, and other sources of particulate. Nitrogen dioxide is also often used as a proxy measure for diesel particulate, but picks up NO₂ from all sources. Measurements of black carbon is considered the best proxy for DPM, but is not incorporated into the AQI. The composite AQI, then, is a rather blunt tool to assess diesel particulate.

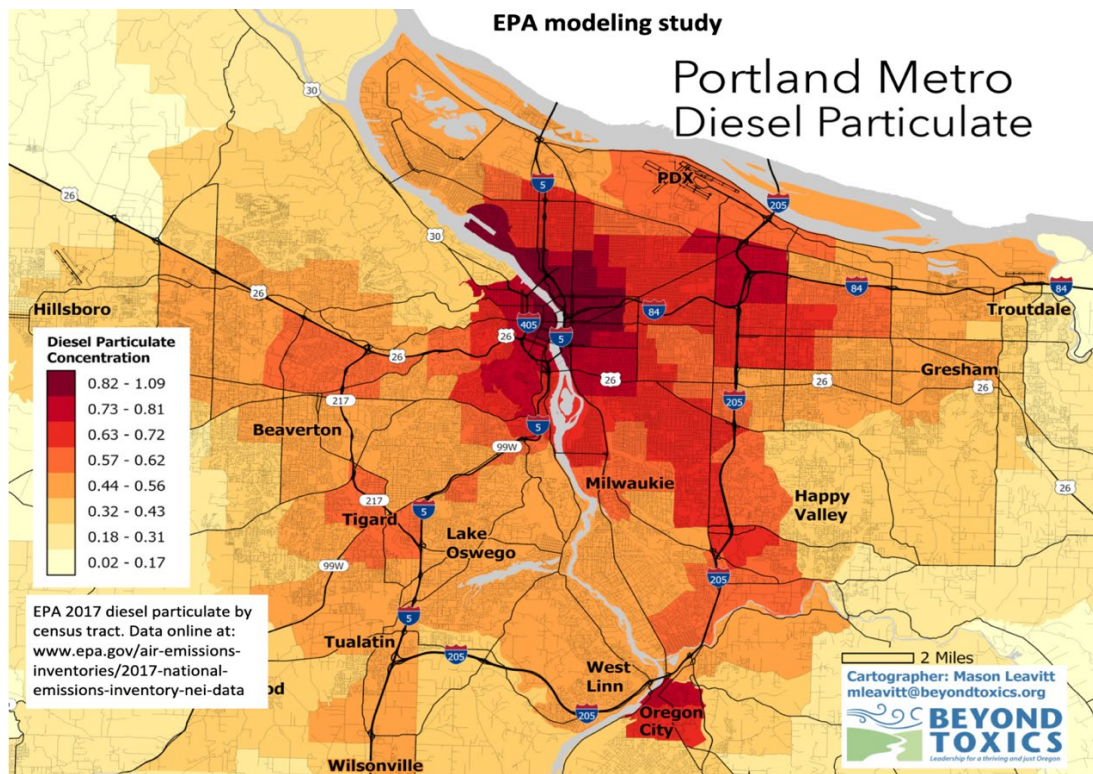
The EPA conducts annual assessments of air toxics, including DPM and they deploy monitors more specific to DPM. However, the most recent data available from the EPA's annual AirToxScreen is from 2021 and is not available to the public in a user-friendly way. (At least not to me!) Neither outdated data nor current but non-specific data are good options to support a targeted approach to mitigating DPM.

The best map we have of DPM in the tri-county area, displayed below, is based on 2017 EPA National Emissions Inventory model data released in 2020, which was downloaded and portrayed with GIS mapping by Portland Clean Air (PCA) and BeyondToxics.⁷ The EPA model data was further verified using a mobile, Grimm MiniWras 1371⁸ owned by PCA.

⁶ AirNow. Air Quality Index (AQI) Basics. <https://www.airnow.gov/aqi/aqi-basics/>

⁷ Portland Clean Air. Op. Cit. <https://portlandcleanair.org/files/reports/MiniWRAS%20report.pdf>

⁸ Durag Group. "Grimm MiniWRAS 1371." <https://www.durag.com/en/product-filter-837.htm?productID=MiniWRAS%201371>



It is unknown how much ambient concentrations and geographic patterns of DPM have changed since 2017. Readings of ambient levels of DPM conducted by PCA in Portland with the Grimm MiniWRAS last year suggest that the declines in DPM have not been significant. We have within our community the tools and expertise to update the 2017 map. What is required are resources and collaboration. In my many conversations with workers at Oregon DEQ I was told that better air toxic monitoring needs to be done in Portland and DEQ was ready to collaborate. But again, it takes resources.

I appreciate and fully support the County's intention to partner with community organizations. Ten neighborhood associations located in the heart of Portland's diesel pollution zone have already banded together to pressure Portland's largest diesel truck fleet owners to electrify their fleets. The community knows that DPM is a problem.

Low/Zero-Emission Zones:

In 2008 London implemented a low emission zone (LEZ) designed to prohibit diesel-powered trucks, buses, and vans from operating in heavily polluted urban areas.⁹ The zone boundaries and subject vehicles have since been expanded. A 2025 assessment of the program found that it contributed to significant reductions in ambient NO₂, PM_{2.5}, and CO₂ and had a greater impact

⁹ Kelly, Frank, et al. 2011. "The London Low Emission Zone Baseline Study."
<https://pubmed.ncbi.nlm.nih.gov/22315924/>

on socioeconomically deprived residential areas.¹⁰ Low or zero emission zones have been most commonly implemented in European cities, but in 2021 Santa Monica became the first city in the nation to establish a Low Emission Delivery Zone.¹¹

In 2024 the City of Portland conducted an EPA-funded pilot study of a Low Emission Delivery Zone, likewise designed to reduce diesel truck traffic in downtown Portland.¹² Multiple next steps were identified in the ZEDZ Pilot Executive Report, all of which are contingent on securing funds. I wonder if there are opportunities here for the County to collaborate with the City on reducing DPM in our most heavily polluted urban zone.

DPM and Climate Change

Decarbonizing the transportation sector is identified as a key strategy toward accelerating the reduction in greenhouse gas emissions. Although black carbon, a key component of diesel particulate is not a greenhouse gas, it has powerful heat trapping effects and can be considered the second largest contributor to global warming behind CO₂ and ahead of methane.¹³

Black carbon's effects are complex. It absorbs solar radiation and converts it to heat radiation, but also darkens snow and ice so that they melt faster, disrupts patterns of rainfall, and reduces reflectivity of snow, ice, and clouds.¹⁴

However, the climate effects of black carbon, as a short-lived climate pollutant SLCP¹⁵ play out over a very short time frame, weeks to months, unlike CO₂ and methane, which persist in the atmosphere for much longer. This means that reductions in DPM have the potential to produce more rapid reductions in climate warming than reductions in either CO₂ or methane.¹⁶ This makes it even more imperative that the County focus on rapid mitigation of diesel pollution.

I applaud the County's considerable efforts to do the right thing for our community in reducing both the risks associated with uncontrolled air pollution and the harms from global warming.

¹⁰ Mayor of London. 2025. "London-wide Ultra Low Emission Zone One Year Report."

<https://www.london.gov.uk/programmes-strategies/environment-and-climate-change/environment-and-climate-change-publications/london-wide-ultra-low-emission-zone-one-year-report#air-pollutant-concentrations-general-trends-235055-title>

¹¹ City of Santa Monica. 2021. "LACI Launches First-in-Nation Zero Emission Delivery Zone."

<https://www.santamonica.gov/press/2021/02/25/laci-launches-first-in-nation-zero-emissions-delivery-zone-with-city-of-santa-monica-and-partners-including-nissan-ikea>

¹² City of Portland. 2025. "Zero-emission Delivery Zones Pilot Executive Report."

<https://www.portland.gov/transportation/planning/zero-emission-delivery/zedz-pilot-executive-report>

¹³ Bond, T., et al. Op.Cit. <https://agupubs.onlinelibrary.wiley.com/doi/full/10.1002/jgrd.50171>

¹⁴ Ramanathan, V. and Russell, L.M. 2013. "Black Carbon and the Regional Climate of California."

<https://ww2.arb.ca.gov/sites/default/files/2020-07/ramanathan.pdf>

¹⁵ Blackstock, Jason, J. and Allen, Myles R. 2013. "The Science and Policy of Short-lived Climate Pollutants." <https://oms-www.files.svdcn.com/production/downloads/briefings/PolicyNote-SLCPs.pdf>

¹⁶ Sims, R., V. Gorsevski and S. Anenberg. 2015. "Black Carbon Mitigation and the Role of the Global Environment Facility: A STAP Advisory Document." https://www.thegef.org/sites/default/files/council-meeting-documents/EN_GEF.STAP_.C.49.Inf_.02_Black_Carbon_Mitigation_and_the_Role_of_the_GEF_5.pdf

Thank you for this opportunity to share my thoughts about the Climate Justice Plan and I look forward to enhanced collaboration between the County and the many community groups concerned about environmental and climate justice.

Respectfully submitted,

Patricia Kullberg MD MPH

Oregon Physicians for Social Responsibility

Medical Director, Multnomah County Health Department 1988-2008



Multnomah County Board of Commissioners

501 SE Hawthorne Blvd.

Portland, OR 97214

RE: Comments on Multnomah County's Proposed Climate Justice Plan

Chair Vega Pederson and Commissioners Moyer, Singleton, Brim-Edwards, and Jones-Dixon,

Our coalition appreciates the significant effort that County staff, community members, and Steering Committee members have invested in the development of the Climate Justice Plan. We share the goal of creating a healthy, resilient, and prosperous future for all Multnomah County residents and recognize the importance of addressing climate-related challenges facing our region.

At the same time, we write to express serious concerns regarding the process used to develop the Plan and respectfully urge the Board to delay adoption until additional technical stakeholder engagement and financial or economic impact analyses can be completed. The Plan is not simply an aspirational vision document; it establishes a framework intended to influence future County decision-making across housing, transportation, energy, infrastructure, public health, economic development, workforce policy, and governance. Given this reality, the Plan warrants a level of stakeholder engagement, technical and economic analysis, and transparency commensurate with its long-term implications.

Throughout the development process, many organizations representing employers, manufacturers, labor organizations, utilities, and other affected stakeholders participated in good faith through meetings, policy listening sessions, and public comment opportunities. Participants repeatedly raised questions and concerns regarding implementation pathways, economic impacts, infrastructure implications, governance structures, legal authority, performance measures, and accountability mechanisms. Unfortunately, the revised draft provides little evidence that these concerns were incorporated into the final document. Many stakeholders have come away with the impression that their participation was treated as a procedural requirement rather than a meaningful opportunity to shape policy objectives. The result is a plan that calls for broad community collaboration while leaving many stakeholders skeptical of the weight of their input, despite



representing organizations or companies integral to the implementation and maintenance of many of the Plan's strategies and goals.

This concern is particularly significant given the County's stated commitment to transparency, co-creation, and shared governance. Meaningful engagement requires more than providing opportunities to comment and participate in public meetings. It also requires demonstrating the ways in which feedback was evaluated, incorporated, and, where appropriate, why alternative recommendations were not adopted. Follow up and follow through, even with stakeholders that might represent or hold different views than those of the project management team, is good faith acting on the part of the government convener. That was not carried out in the development of this policy.

In addition to process concerns, we remain troubled by the absence of sufficient implementation analysis accompanying the Plan. The Plan contains numerous recommendations that could have significant implications for affordability, economic competitiveness, investment, workforce development, energy systems, and public service delivery in Multnomah County. Yet stakeholders have not been provided with a comprehensive assessment of potential costs, implementation challenges, tradeoffs, legal considerations, or interactions with existing local, regional, and state policies. Without this analysis, policymakers and the public are being asked to evaluate an expansive policy framework without a clear understanding of how proposed strategies may affect the communities, workers, employers, and institutions responsible for implementing them.

We are also concerned that the accelerated timeline for the consideration of the revised draft has limited opportunities for meaningful review of changes made following earlier engagement efforts. For a plan intended to guide County decision-making for years to come, additional time for dialogue would strengthen both the credibility of the process and the durability of the final product.

We do believe that the County has an opportunity to develop a stronger and more effective Climate Justice Plan but doing so will require meaningful engagement with the full range of stakeholders affected by the Plan, transparent consideration of feedback received throughout the process, and a more robust analysis of implementation pathways and potential impacts. Accordingly, we respectfully request that the Board postpone adoption of the Climate Justice Plan and direct staff to undertake additional stakeholder engagement and develop the economic and legal analyses necessary to support informed policymaking.

We appreciate your consideration and look forward to continuing to engage constructively in this important conversation,



July 20, 2026

Dear Multnomah County Board of Commissioners:

On behalf of Trees for Life Oregon, we appreciate the opportunity to provide input on the draft Multnomah County Climate Justice Plan (CJP).

First, we applaud the County and its community partners for investing in this important effort. We understand that this draft reflects the hard work and commitment of many organizations and individuals.

Second, we appreciate the breadth of this plan, its goals, and the many strategies proposed to meet those goals over time. TFLO's focus is on protecting and increasing tree canopy for the critical benefits it provides, AND on preserving and creating space for trees, especially large-form trees. This draft plan provides an important opportunity to recognize that trees are necessary to achieve climate resilience and climate justice in Multnomah County. Below we outline our priority issues, concerns, and recommendations relating to the following four sections of the draft CJP:

1. **Air Quality:** The draft CJP starts with a strong section on Air Quality. However, the Description section should recognize that air quality issues and impacts are exacerbated by heat and disparities in tree canopy across the county. It should also be noted here or in the Parks and Green Infrastructure section that trees can help improve air quality, including reducing particulates and ground-level ozone, which are also exacerbated by heat. These information sources could be cited and included in a plan resource list. [Air Pollution Removal by Urban Forests \(U.S. National Park Service\)](#) , [USDA Air flier FINAL](#)
2. **Wealth and Jobs:** We commend the County for its goal that every community member has access to wealth-building opportunities and green jobs. This section mentions green job pathways such as "building out renewable energy, modernizing the grid, investments in new energy technologies like green-hydrogen and geothermal networks, and building

energy efficiency.” Notably missing from this section is the featuring of green infrastructure-related job and career opportunities such as arboriculture and tree care (arborists), horticulture, habitat restoration, green stormwater facility design/construction, and environmental education. The draft CJP’s Parks and Green Infrastructure section notes that we need strategies to maintain street trees to reduce cost burden on residents. The Portland Clean Energy Fund will be providing resources to embark on a street tree maintenance pilot program in the City of Portland. Over time this program will provide ample opportunity for green workforce training and job opportunities. The Green Leaders Program currently sponsored by the Bird Alliance of Oregon is an excellent example of BIPOC youth workforce development in the green job field. [A New Chapter for Green Leaders and 82nd Avenue - Bird Alliance of Oregon](#)

3. **Health:** We urge the County to take a leadership role in linking the benefits of urban trees to our physical and mental health. The draft CJP’s Health Section clearly states that climate change acts as a “risk multiplier,” worsening existing public health issues and intensifying health inequities, and that communities of color and low-income populations in the Portland region are already experiencing these inequities. We appreciate the County’s stated commitment to help counteract these risks by providing universal access to fundamental resources necessary for health and well-being—including accessible green spaces. However, access to parks and green spaces does not take the place of weaving trees and tree canopy throughout our neighborhoods to provide cooling shade where we live, work, walk, play, or take transit. Growing bodies of literature, including studies specific to Multnomah County, show undisputably the benefits of urban trees to public health as near as possible to where people live.

We strongly suggest the County integrate this information into the health-related strategies in this plan, including “Implement the Climate and Health Resilience Plan,” where listed activities under Putting this into Practice include building partnerships with agencies and organizations in heat resilience focus areas, co-developing and piloting heat resilience solutions with partner organizations, and measuring and monitoring changes to heat resilience. In particular, the action to “Develop a suite of housing policies supported by evidence on climate impacts on public health” provides an opportunity to promote the integration of housing goals with tree canopy goals to achieve “healthy housing.” Tree-related information should also be integrated with various aspects of the strategy titled “Initiate a climate and health literacy education campaign to access resources and preventative care.” Here are links to a few useful information sources: [The little-known physical and mental health benefits of urban trees » Yale Climate Connections](#) , [The Mental Health Benefits of Urban Trees: A Deep Dive into Recent Research - Tree Canada](#) , [Wolf 2020 urban-trees-and-human-health-review.pdf](#)

4. **Parks and Green Infrastructure:** We support the draft CJP goal that “Every community member is surrounded by and connected to nature, parks, and green infrastructure.” And we appreciate the discussion of the importance of trees, tree canopy, parks, tree canopy disparities, and that the plan includes tree canopy as a metric for measuring progress. We also support the strategy to “Prioritize tree planting in low-canopy neighborhoods.” We fully agree with statements that planting trees will not be enough, that removing concrete and asphalt may be necessary to create more space for trees, that we need to develop programs to maintain street trees, and that tree codes are an important tool. However, it is also important that the CJP call for innovative policies and design approaches to preserve both existing trees and space for trees in conjunction with development to meeting housing and other community needs. We would also urge the County to integrate these policies and design approaches across the board by reviewing County land use and development codes for opportunities to integrate tree preservation, space for trees, and tree planting into new development.

Sincerely yours,

Kyna Rubin

[Trees for Life Oregon](#)