

Bureau of Planning and Sustainability
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MEMO

DATE: June 3, 2015
TO: Portland Planning and Sustainability Commission
FROM: Michele Crim
SUBJECT: 2015 Climate Action Plan - Summary of Public Comment and Document Revisions

This memo summarizes public comments received during the draft Climate Action Plan (CAP) public comment period (March 1, 2015 through April 10, 2015). The purpose of this memo is to share a summary of the main themes of the public's feedback and outline the resulting changes to the CAP.

The primary audiences of this memo are the Portland Planning and Sustainability Commission and people who participated in the writing or review of earlier drafts of the CAP. The City of Portland and Multnomah County value public participation, and this memo offers additional transparency for the many people who have contributed to the 2015 CAP.

Public comments were collected during open house events, community presentations, stakeholder meetings, and through online and paper surveys. Comments were submitted by email, hardcopy and through verbal correspondence with staff.

Staff reviewed each comment as they considered potential revisions to the CAP. Some comments resulted in amendments to the document, others did not. City and County staff added, removed or revised actions and narrative to reflect public and agency feedback. Staff editors also restructured several sections and revised other elements of the document to improve readability or update information and data.

This memo is organized into the following categories:

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Areas of General Public Support

In general, commenters felt that the CAP was comprehensive and presented useful information. Commenters expressed that they felt the material was easy to understand (for the most part) and they liked the look and feel of the document.

Commenters also expressed strong support for how the CAP addressed numerous issues, including:

- A. Health, equity and bringing the voices of under-served and under-represented communities to the table; the acknowledgement of racial and economic bias in decision-making and investments; the focus on ensuring that climate action benefits East Portland and under-served neighborhoods; and addressing the disproportionate burdens of climate change impacts on low-income populations and communities of color.
- B. Commercial energy performance reporting and the development of performance targets and net-zero goals; the inclusion of actions related to solar, including community solar and collective ownership; and low-income weatherization efforts.
- C. Solving transportation funding issues; pedestrian and bike infrastructure; and better access to frequent and affordable transit.
- D. The development of a consumption-based carbon emissions inventory; and awareness building about the impacts of food and consumption choices on carbon emissions levels.
- E. Food-related issues such as co-ops, local food options, urban farming and the discussion of plant-based diets and the carbon emissions associated with meat.
- F. Putting a price on carbon.
- G. Preparing for increased temperatures and urban heat island impacts, as well as other aspects of climate change preparation efforts to build resilience in social, natural and built environment systems.
- H. Creating opportunities for composting and recycling in multifamily buildings.
- I. Actions that help support the creation of jobs and vibrant neighborhoods.
- J. Tree planting and environmental restoration.
- K. Reducing the carbon footprint of government operations.

Public Comments - Written responses

The comments received covered a wide array of topics, ranging from general observations on the project process or scope, to suggestions for specific edits to the language of the document. Staff identified the following major themes, which are addressed in greater detail in the remainder of this document:

1. Scope, Metrics, Goals and Timeframe (page 3)
2. Emissions Inventories (page 5)
3. Equity and Co-Benefits (page 6)
4. Buildings and Energy (page 7)
5. Urban Form and Transportation (page 9)
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7. Food and Agriculture (page 12)
8. Urban Forest, Natural Systems and Carbon Sequestration (page 13)
9. Climate Change Preparation (page 14)
10. Community Engagement, Outreach and Education (page 15)
11. Local Government Operations (page 16)
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1. Scope, Metrics, Goals and Timeframe

Summary of public comments:

- A. Commenters questioned if the actions outlined in the CAP were enough to reach the intended targets (e.g., 80 percent reduction of carbon emissions by 2050). They expressed that many of the actions seemed too broad/general to determine if the actions were scaled appropriately. Others observed that some of the goals seemed aspirational, while others fell short of being visionary.
- B. Numerous commenters advocated for the adoption of formal and binding carbon emission reduction goals and/or targets.
- C. Commenters expressed a desire to see the actions in the CAP prioritized based on scale of impact, timing of implementation or other measures.
- D. Several commenters requested clarification on how/when progress would be reported, what metrics would be measured and how the plan would be monitored and facilitated. Some commenters felt that clear metrics of success needed to be defined now, rather than waiting to develop them (Action 20L, page 134).
- E. Based on some of the comments it became clear to staff that there is confusion about the various timeframes in the CAP (5-year actions, 2030 objectives, 2030 and 2050 emission reduction goals).
- F. Many commenters expressed concern that the CAP actions were not ambitious enough given the urgency of addressing climate change. Some expressed that many of the goals and actions were not aggressive enough -- that there was too much “encourage,” “support,” “explore,” and not enough “require” or “prohibit.”
- G. Commenters expressed a desire to see clear and explicit guidance directing bureaus and departments to incorporate climate change considerations into decision-making.
- H. Commenters requested clarification on how the actions in the CAP are to be funded, as well as an assessment of potential impacts of the proposed plan on local businesses.
- I. A few commenters expressed that the CAP was a waste of public money because 1) Addressing climate change is not an area where the City or County can have any meaningful or measurable impact (e.g., too small to matter at a global scale), or 2) The plan is not based in science and that climate change is not real.
- J. Some commenters suggested making more explicit actions/commitments with partners and other agencies (e.g., work with Metro on a regional CAP and preparation strategy; and with TriMet on electric busses and other service improvements).
- K. Commenters wanted to see more: linkages and/or acknowledgment of climate actions by other partners; alignment with state and federal policies and plans; and integration with other existing efforts such as disaster planning (e.g. earthquake preparedness).

Summary of staff response to public comments:

Commenters proposed improving clarity in the CAP with respect to the prioritization and timing of actions, and how the various actions and goals relate to one another. In addition to the existing narrative about this on page 57, 131 and 138 of the CAP, changes were made as outlined in the bulleted list below.

The narrative in the Implementation chapter (page 131) and the Climate Action Plan Development Process (page 138) outlines how progress on implementing the actions in the plan

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will be publicly reported annually, along with the updated carbon emission inventory. Action 20L Metrics (page 134) calls for the development of key progress metrics. The frequency with which progress on these metrics is reported will depend on a variety of issues, including data availability. In addition, several measures of success from the Portland Plan will be used, including resident satisfaction, transit and active transportation, carbon emissions, complete neighborhoods, healthier people and healthy watershed. The City and County will use the Portland Plan's indicators of success, as well as the CAP's 2030 Objectives for long-term benchmarking metrics. Finally, staff reviewed and revised several goals and targets for the renewable energy, energy efficiency, weatherization retrofits, electric vehicles, tree canopy, and waste diversion categories.

It is important to recognize that CAP implementation is necessarily decentralized with individual City and County bureaus and departments have responsibility for implementing different actions. For these reasons, staff chose not to prioritize the actions against one another beyond the existing framework of potential carbon impact as described on page 56 and the Climate Action Considerations on page 138.

Funding and resource decisions for the implementation of each action are made on a project-by-project, program-by-program basis. However, the likelihood of acquiring funding through existing or potential financial resources was used as a screening criteria for determining which actions were included in the CAP and which ones weren't. Actions in the CAP are intended to provide broad guidance and direction rather than detailing implementation tasks to be funded with CAP specific resources.

Changes of note include:

- Narrative was added to articulate how local action can make a difference on a global scale (page 10).
- Modifications were made to Figure 2 (Local carbon emission trends and goals, page 17) to indicate the annual reductions needed to achieve the 2050 goal of an 80 percent below 1990 emissions reduction (e.g. 1.5 percent annual reduction between 2013 and 2030).
- Modifications to Figure 5 (Emission reductions needed to reach 2050 goal, page 21) were made to clarify the timeframe of the plan's actions and the expected emission reductions toward long-term goals.
- The 2050 carbon budget graphics and data were slightly modified to reflect updated baseline data (pages 19 and 20).
- Narrative was modified to improve clarity about the timeframes of the goals and actions in the CAP (5-year actions, 2030 Objectives, 2030 and 2050 emission reduction goals) (page 26).
- To reduce confusion about the timeframe for implementation of the actions "Actions to be completed by 2020" was added as a column header on all action tables (multiple pages throughout the document, beginning on page 64).



2. Emissions Inventories

Summary of public comments:

- A. Commenters expressed a desire to see the plan more explicitly account for all greenhouse gas emissions, including fugitive emissions from extraction processes and upstream/downstream emissions from fossil fuels that pass through Multnomah County, as well as emissions associated with flights to and from the Portland airport.
- B. Commenters expressed appreciation for the attempt to quantify the carbon impacts (blue “C” carbon icons in action tables), but wanted to see a more detailed methodology of this assessment.
- C. A few commenters suggested that the consumption emissions data underestimated the emissions associated with food production because it doesn’t include emissions associated with land use changes.
- D. Commenters requested clarification on how progress toward achieving carbon goals is tracked over time (consumption-based versus sector-based inventories). Some expressed a desire to see consumption-based emissions tracked annually and/or for progress toward emission goals to be measured based on the consumption-based emissions methodology.

Summary of staff response to public comments:

Considering full lifecycle carbon emissions is important in decision-making, but including those emissions in local level carbon emission inventories does not conform to the U.S. Community Protocol for Accounting and Reporting Greenhouse Gas Emissions (version 1.1, July 2013). In addition, Portland’s carbon emissions inventory goes back to 1990 and historical data related to full lifecycle emissions and/or emissions from materials/goods/fuels that pass through Portland is not available.

Emissions from air travel are currently captured in the consumption-based inventory, but are not in the sector-based inventory. Although air travel (PDX airport) is not a standard component of the inventory protocol (see appendix 3, page 152), the City will explore options to calculate air travel emissions that could be attributed to Multnomah County residents and evaluate future incorporation into the sector-based inventory. In addition, the City will consider incorporating air travel in consumption-related outreach and education efforts.

Consumption-based inventories or community-wide lifecycle assessments are an emerging field. The current tools available to local governments remain limited. They provide an overall snapshot, but not enough granularity to track changes over time. As an example, if Portlanders begin to purchase products from companies that work to reduce the carbon intensity of their supply chains over products from companies with average business practices, the current models and data sets can’t account for this distinction. Therefore tracking consumption-based emissions on an annual basis would not yield results that can account for behavior change and shifts in business practices at the local level. Oregon is looking at conducting the state consumption-based inventory every five years and the City will likely use the same methodology. The City and County will continue to monitor industry best practices and seek to find better tools and data sets to analyze and track community-wide lifecycle emissions.



Changes of note include:

- Narrative was modified to reflect updated information about how long carbon emissions persist in the atmosphere (page 14).
- Narrative was added to acknowledge that lifecycle emissions, including fugitive emissions from natural gas extraction, are a concerning emissions source and to express the City's commitment to incorporate emerging lifecycle emissions research into policy work (page 30).
- Narrative was added to direct the reader to the appendices for the emissions inventory methodology (page 32).

3. Equity and Co-Benefits

Summary of public comments:

- A. Commenters raised concerns that the plan did not adequately discuss or aim to effectively address gentrification pressures, including from climate actions and investments.
- B. Commenters highlighted a need to add focus on ensuring economic opportunities are shared with under-served communities, and that these communities are seen as a strength/asset to achieving broader climate goals.
- C. Many comments commended staff for the process to incorporate equity into the plan so far, but cautioned that the City and County need to ensure the efforts started through this process don't stall and that under-served and under-represented communities deserve to see actions taken in a timely manner.
- D. Similarly, some raised concerns that the good intentions outlined in the plan won't be delivered, especially for East Portland residents.
- E. Requests were made to add specific language related to social determinants of health or populations with health disparities.
- F. Commenters saw a need for additional narrative to clarify the co-benefits represented by the icons in the action tables (heart, dollar sign, tree, "E").
- G. Commenters expressed a desire to see an expanded focus on black carbon, including diesel particulate matter and wood smoke, and to define more clearly the health and equity co-benefits of black carbon reductions.
- H. The desire was expressed to see particular implementation tools called out, such as Health Impact Assessments, particularly for large projects or actions with the potential to have significant impacts on the community.

Summary of staff response to public comments:

The CAP Equity Implementation Guide (a separate document) will provide City staff with additional tools and resources to help ensure the actions in the CAP are implemented in ways that advance health, equity and prosperity, particularly for low-income populations and communities of color, including those living in East Portland. The City and County will track and report the degree to which the Equity Objectives (see Appendix 1, page 148) have been integrated into the decision-making processes and implementation of the CAP.



That said, staff agreed with commenters that the plan did not say enough about the value of diversity in economic development, gentrification and displacement, and the social determinants of health.

Changes of note include:

- Affordable housing was added to the 2050 Vision (page 3).
- East Portland was circled on Figure 19 (percent change in populations of color) to help define the area being discussed in the chapter (page 45).
- Narrative was added about addressing gentrification and displacement (pages 48 and 77).
- The chapter titled “A more prosperous, healthy and equitable Portland” was restructured to improve the flow, make space for additional narrative and to link more clearly to the co-benefits icons outlined on page 56 (pages 50-55).
- Narrative was added about the social determinants of health (page 51), the importance of diversity in economic development (page 54) and ecosystem services (page 54).
- Map of natural green infrastructure was added to supplement the narrative content on the benefits of ecosystem services and a healthy environment (page 55).
- Narrative related to collaboration and partnerships was moved from page 54 to page 144 to better link with related content.
- Narrative was modified to clarify that the health co-benefit impact icon (heart in a red box) does not apply when the health benefits of an action occur outside of Multnomah County (page 57).

4. Buildings and Energy

Summary of public comments:

- A. Numerous commenters raised concerns around fossil fuel exports and advocated for a ban on all new fossil fuel export-related infrastructure (storage, transfer, etc.), citing concerns related to fugitive and lifecycle emissions from extraction, environmental degradation, safety and the enabling or exacerbation of carbon emissions in countries where the exported fuels end up.
- B. Other commenters questioned the City’s authority to develop (and/or expressed concerns about the appropriateness of developing) a fossil fuel export policy, while others encouraged the City to consider the potential impacts of such a policy on jobs and local businesses.
- C. Commenters expressed a desire to see a commitment to limit the City or County’s activities related to contracting, subsidizing or permitting companies and facilities whose primary business is extracting, refining or transporting fossil fuels, including those that manufacture equipment for doing so.
- D. Commenters requested the addition of content related to the divestment from fossil fuel companies, dismantling of existing fossil fuel infrastructure and plans for transitioning to sustainable energy.
- E. Several commenters suggested that the targets related to renewable energy, energy efficiency and weatherization retrofits were not high enough to achieve the desired carbon emission reduction goals.



- F. Commenters wanted the City and County to express support for federal action on climate utilizing the Clean Air Act and to lobby for “beyond coal” legislation.
- G. Commenters shared a variety of opinions about carbon pricing and/or a carbon tax. Some expressed opposition to taking action at a local level and wanted the City to wait for state or federal action. Others suggested that local action should be taken immediately. Still others focused on ensuring that any such action ensure that the benefits of ensuing investments happen locally and/or are prioritized for under-served and under-represented communities.
- H. Concerns about protecting solar access, suggestions for requiring rooftop solar and/or ecoroofs, and requests to include industrial properties in mandatory energy use reporting and benchmarking policies were expressed by several commenters. Commenters also suggested performance-based incentives and streamlined permitting to help achieve residential efficiency goals.
- I. Many commenters expressed the need for the City and County to have more direct involvement with helping schools upgrade their buildings, install solar, etc.
- J. Commenters indicated that carbon benefits of small building/home size was not addressed as strongly as expected. Similarly, many commenters wanted to see more discussion of the impacts of the demolition of existing homes.
- K. Some advocated for linking seismic retrofits as part of energy efficiency and weatherization retrofits.

Summary of staff response to public comments:

Many community members urged the City to adopt a fossil fuel export policy that bans all new fossil fuel export related infrastructure (storage, transfer, etc.). Because of the considerable public interest in this issues, the CAP proposes a deliberative public process to examine all of the issues in determining the policy direction on this topic. Action 3G (page 69) has been modified to outline the items to be considered through that process, including lifecycle emissions, safety, economics, neighborhood livability and the environmental quality.

Other topics raised by commenters are generally covered in the document narrative and/or actions, including small homes and accessory dwelling units (action 8F page 91), rehabilitation and adaptive reuse (action 8E page 91) and demolition and salvage (action 10B page 94 and action 11B, page 96).

Changes of note include:

- Narrative was updated to reflect the recently adopted City policy related to building energy performance rating and transparency (page 60).
- Figure 26 (2007 and 2012 solar installations), was modified to improve readability (page 61).
- Narrative about energy cost burdens on low-income households was updated to reflect additional assessment of the available data. Figure 26 (Annual household energy costs vs. HUD-adjusted median family income) was deleted due to limitations in the data (page 62).
- New narrative highlighting the Cully Weatherization 2.0 Project was added (page 62) to highlight this community-led initiative.
- Action 1A, Commercial Energy Performance Benchmarking, was updated to reflect the adoption of the energy performance benchmarking policy for commercial buildings and to explore options for multifamily buildings (page 64).



- Multifamily buildings were added to action 1D, Operations and Maintenance (page 64).
- Action 1G, Small Commercial, was modified to include ensuring that financial tools can be used by small commercial buildings and the County Office of Sustainability was added as a lead agency (page 65).
- Data related to the Clean Energy Works program was confirmed and the date stamp updated accordingly (page 65).
- Action 3B, Installed Solar, was modified to include solar access by revisiting City solar policy and regulations that impact solar, and the County Office of Sustainability was added as a lead agency (page 68).
- Action 3E, Biogas, was modified to include narrative about minimizing disproportionate impacts on low-income populations and communities of color (page 69).
- Action 3G, Fossil Fuel Exports, was modified to clarify that lifecycle emissions, safety, economics, neighborhood livability and the environment would be considered in the development of a fossil fuel export policy (page 69).
- An action related to the divestment from fossil fuel companies was added - action 19T (page 128).

5. Urban Form and Transportation

Summary of public comments:

- A. Commenters suggested a stronger focus on supporting electric vehicles and recommended additional actions to increase the rate of adoption locally. Suggestions included adding actions related to development codes, publicly available chargers, electric car sharing options, electric busses, electric bikes and scooters, etc.
- B. Concerns were expressed that CAP language related to freight movement implied that communities of color and low-income populations were intentionally being harmed by freight involved businesses.
- C. Concerns were expressed about the demolitions of older homes related to embedded energy, loss of large trees, release of toxic materials and impacts to local air quality, etc. Commenters recommended a greater focus on encouraging tiny homes and accessory dwelling units, as well as strategies for more affordable housing.
- D. Commenters desired a greater emphasis on explaining the role of density in helping to reduce carbon emissions from buildings and from transportation fuels. Many also suggested actions related to prohibiting/restricting both on-street and off-street parking to encourage active transportation modes.
- E. Commenters wanted to see a greater focus on ensuring transit coverage and efficiency that connects people to employment centers outside of the downtown, including the Columbia Corridor.
- F. Commenters wanted to ensure that the actions/efforts to increase active transportation modes did not penalize those in the community who are reliant on cars (e.g., people working swing and graveyard shifts) or disabled individuals requiring personalized transportation services.



- G. Commenters recommended that the City and County play a more active role in financing transit infrastructure and to be more aggressive in the pursuit of rapid transit options.
- H. In addition, some commenters suggested that the opportunity to address congestion is missing from the CAP.
- I. Commenters suggested that the plan be more explicit about intended actions and/or prioritization of East Portland and under-served communities. They emphasized that East Portland is different than the rest of the city and needs to have separate goals and actions to ensure that this area will be a focus and to react to the specific community needs and existing development patterns.
- J. Some commenters called for actions to improve local mountain bike trail options, in addition to other biking infrastructure investments.

Summary of staff response to public comments:

Commenters identified the need for additional content to describe the relationship between urban growth and density and opportunities to reduce carbon emissions. Additional content was added to the Urban Form and Transportation chapter on this topic, including new graphical elements of the centers and corridors map and renderings of low-carbon communities.

Additional narrative was incorporated about: balancing truck movement needs with those of other transportation modes; improving the transportation system to meet increased freight and goods movement demand; recognizing the role of goods delivery in supporting healthy, vibrant industrial districts, mixed-use centers and main streets; clarifying the narrative about improving safety and reducing disproportionate impacts on low-income populations and communities of color.

Changes of note include:

- Figure 34 (2012 bike commute mode split) was combined with Figure 33 (similar map for 1990) on page 76 to make room for new narrative about urban growth and density (page 77).
- New narrative about the connection between urban growth and density and carbon emission reductions was added (page 77).
- Action 4F, Orphan Highways, was modified to include the names of some of these roads (e.g. Powell, 82nd Ave., Barbur Blvd., Lombard) to reduce confusion, as several commenters thought they were abandoned roads (page 79).
- Action 4W, Transit Coverage and Efficiency, was modified to include a reference about frequent service transit to the city's many employment centers (page 82).
- Electric vehicles were added to action 4DD, Car Sharing (page 83).
- Action 5B, Freight Movement, was modified to reflect discussion above (page 84).
- Safety and smart pedestrian crossing technologies were added to action 5D, Traffic Signals (page 84).
- Action 7A, Electric Vehicles, was modified to increase the goal to adding 8,000 new electric vehicles in the next five years and the action was expanded to call for the update of the City's Electric Vehicle Strategy (which would evaluate opportunities to increase public access to fast charges, address barriers for garage-free homes, install charging infrastructure integrated into streetlights, include electric vehicles in car sharing programs and to support electric bikes and buses) (page 87).



- Action 7C, Low-Carbon Fuel Standards, and narrative in the introductory paragraph was updated to reflect the recent adoption of such a standard for Oregon (page 87).
- The City Bureau of Planning and Sustainability was added as a lead agency to action 7F, Black Carbon (page 87).

6. Consumption and Solid Waste

Summary of public comments:

- A. Commenters suggested adding consumption-based emission goals/targets and regular inventory of these emissions to track progress toward those goals.
- B. Commenters expressed concern that the consumption and solid waste chapter lacked clear and meaningful consumption-related actions for government or specific actions individuals should take.
- C. Clarification was requested about if and how waste reduction and behavior change results were being measured from outreach and engagement campaigns.
- D. Commenters would like to see better incentives and stricter enforcement and fines for contamination of recycling and composting in commercial and multi-family sector.

Summary of staff response to public comments:

In response to the comments that this chapter was not sufficiently specific about local government actions, staff revised and refocused the chapter. It now includes an action to develop a comprehensive sustainable consumption and production strategy to establish the role of local government in affecting consumption and to identify appropriate strategies and actions.

Changes of note include:

- Action 8A, Assistance to Producers, was deleted and a new action to develop a sustainable consumption and production strategy was added (page 90).
- Objective 9 and associated narrative was modified to focus on reducing food scraps sent to the landfill rather than total solid waste generated (page 92).
- Action 9A, Waste Prevention, and 9C, Deconstruction and Salvage, were moved from Objective 9 on page 92 to Objective 10 on page 94.
- Action 10A, Composting, was moved from Objective 10 on page 94 to Objective 9 on page 92.
- Additional narrative about considering the full lifecycle of materials was added to action 11C, Portland Recycles Plan (page 96).
- A new action (11G) was added related to waste recovery infrastructure (page 97).
- Objective 11 related to the carbon impacts of the waste collection system, along with actions 11A, Hauler Fleets, and 11B, Route Efficiency, were deleted. Those actions were fully implemented through the 2009 Climate Action Plan and were no longer needed (page 96).
- A new Objective 10 was created to reduce per capita solid waste by 33 percent (page 94) and existing actions (previously 9A and 9C) related to waste prevention and deconstruction and salvage were moved over to this objective (page 94).



7. Food and Agriculture

Summary of public comments:

- A. Numerous commenters wanted to see an increased focus on the carbon impacts of food choice, particularly meat. Suggestions included: low-carbon food policies related to the City and County's purchases for public meetings (in addition to other health and nutrition goals); support for Meatless Monday campaigns and outreach; and providing a plant-based diet in jails, schools and other publicly funded cafeterias.
- B. Commenters highlighted that community gardens were not mentioned in the actions. Commenters also proposed additional focus on expanding efforts related to school gardens and encouraging the planting of fruit and nut trees.
- C. Commenters requested clarification about how progress on reducing high-carbon foods, including meat, would be measured and advocated for establishing a baseline for local meat consumption.
- D. Specific references to agencies, partners and food-related projects being coordinated by external organizations was requested.
- E. Commenters requested additional focus and/or actions related to improving access to affordable, high quality, low-processed/packaged foods for under-served communities.

Summary of staff response to public comments:

Several commenters emphasized the importance of affordability and access to quality low-carbon foods (fruits, vegetables, minimally processed and packaged foods, etc.). Studies show that more than 80 percent of food-purchasing decisions are made on price, not proximity. The City and County have identified potential local government actions to support food buying clubs, cooking classes, farmers market matches, fruit and vegetable prescription programs and increased education.

Existing efforts are underway related to encouraging low-carbon foods in local government, including in the Multnomah County jails. The City is exploring the availability of data to help establish a baseline, as well as monitor progress toward, the goal of reducing the consumption of carbon-intensive foods, including meat.

Changes of note include:

- Working with partners to encourage plant-based diets, including Meatless Monday campaigns, was added to action 12A, Outreach and Education (page 100).
- Supporting affordability and access through neighborhood food buying clubs and co-ops was added to action 12B, Partnerships and Engagement (page 100).
- Additional narrative about community gardens and low-carbon and institutional food purchasing was added to action 12D, Policies and Programs (page 100).
- Animal husbandry was removed from 12E, Skills Development, and Portland Parks and Recreation was added as a lead agency for the City (page 100).
- Figure 39 (Food choice is a key factor in carbon emissions, page 101) was modified to reflect data from more recent studies.



8. Urban Forest, Natural Systems and Carbon Sequestration

Summary of public comments:

- A. A number of commenters expressed concern that the plan was not ambitious enough regarding tree canopy targets and the intent relating to tree preservation and replacement of trees that are removed.
- B. Commenters also noted the impact of growth and infill on trees and proposed additional monitoring of the effectiveness the City's updated tree code in protecting and regenerating the urban forest.
- C. Commenters raised concerns about the loss of large mature trees and the need for more restrictions on tree removals, especially when associated with the demolition of existing homes.
- D. Some commenters found the overall tree canopy goal in Objective 13 confusing and also recommended increasing the minimum tree canopy targets for all residential neighborhoods, commercial and industrial areas and the Central City. It was suggested that the canopy target for the Central City should correspond better with tree canopy targets emerging through the Central City planning process.
- E. Commenters requested adding narrative to emphasize the importance of floodplain restoration, biodiversity and the role of natural systems in helping to prepare for climate change impacts.
- F. Some commenters recommended additional attention to improved soil management practices and efforts to reduce paved surfaces.

Summary of staff response to public comments:

Staff agreed with commenters that the citywide urban forest canopy target (33 percent) should be presented as a minimum amount, given actions in the Portland Plan and this plan calling for the targets to be reviewed and updated. The revised draft also increases the 2030 canopy target minimum for all residential neighborhoods from 20 to 25 percent, and for the central city, commercial and industrial areas from 10 to 15 percent. Requests to expand the content to address climate change preparation, floodplain management, biodiversity and ecosystem services were incorporated as well.

Changes of note include:

- A map of the region's natural green infrastructure, including trees, was added (page 55).
- Narrative was added to reflect the role of natural systems in preparing for the impacts of climate change, along with a reference to the Climate Change Preparation chapter for more details (page 103).
- Narrative around the role of green infrastructure was modified to improve clarity (page 103).
- Objective 13 was updated to reflect the tree canopy targets discussed above (page 104).
- Narrative related to monitoring the impact development, including infill areas, on tree canopy was added to action 13C, Tree Code (page 104).
- Action 13D, Natural Infrastructure, was modified for clarity and to incorporate references to biodiversity and floodplains. The City's Bureau of Development Services was also added as a lead agency (page 105).
- Consideration of the adoption of ecoroof targets in land use plans was added to Action 13F, Designing with Nature (page 105).



9. Climate Change Preparation

Summary of public comments:

- A. Commenters were pleased to see climate change preparation work more fully incorporated into the plan, but wanted clarification on the linkage between the CAP and the recently adopted Climate Change Preparation Strategy.
- B. Commenters were looking for more discussion or actions related to potential climate change impacts on Portland's water supplies. Commenters also raised concerns about impacts to water supply and quality in other parts of North America associated with fracking and/or fossil fuel extraction activities.
- C. One commenter requested clarification on the data, assumptions and methodology used to develop the urban heat island map (Figure 41, page 112).
- D. Commenters raised concerns about the potential for unprecedented population growth as a result of climate migrants/refugees being driven from other parts of the country (e.g., California and other parts of the Southwest U.S.) or other parts of the world.
- E. Commenters requested clarification and/or additional emphasis on how updated floodplain maps would be used and suggested actions related to updating floodplain protection regulations, limiting development in flood hazard areas, etc.
- F. Commenters suggested stronger linkages between existing programs related to natural hazards mitigation, emergency preparedness and response, seismic retrofits, etc. Commenters also noted that many of these efforts (e.g., neighborhood emergency teams) would require additional training and resources to successfully include climate stresses in their work.
- G. Commenters identified potential climate risks to call out more explicitly in the narrative, including reduced air quality from forest fires and impacts to native fish of seasonal temperature and precipitation shifts.

Summary of staff response to public comments:

The Portland Metropolitan region is projected to grow by nearly 1 million people by 2030. In addition to immigration to the region because of traditional rationales (social, economic, etc.), planners are beginning to consider the possibility of “climate migrants” or “climate refugees”—individuals who are moving either by force or by choice in response to climate change impacts in their places of origin. However, at this time there is no indication that the addition of climate migrants to the area would exceed the planned-for population growth.

Nevertheless, local planners and policymakers will analyze long-term climate trends and migration data (see action 16G, page 116) to anticipate who might come here and why, as well as assess potential climate migrant's needs and values. Understanding the economic circumstances and demographic characteristics of those likely to migrate helps planners understand the mix of jobs, housing and culturally appropriate social support necessary for successful inclusion of immigrant communities.

Preparation for climate impacts to Portland's water system is discussed on pages 24, 108, 113 and 114. Unlike many communities in Oregon and other parts of the country, Portland is well positioned in terms of water supply. The Bull Run Watershed is not dependent on snowpack, and the Columbia South Shore Well Field provides both capacity and flexibility. Based on available population and demand projections, adequate water supplies are available to Portlanders for at

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least the next 30 years. More information about how Portland is assessing and preparing for impacts to its water supply is available on the Water Bureau's website at <http://www.portlandoregon.gov/water/climatechange>.

Changes of note include:

- Narrative was added to reinforce the link between the Climate Action Plan and the 2014 Climate Change Preparation Strategy and associated Risk and Vulnerabilities Assessment (page 14).
- Exposure to wood smoke and impacts to biodiversity and native fish habitat were added to the table of local impacts of climate change (page 108).
- Narrative about populations most vulnerable to the impacts of climate change was clarified and linkages to existing disproportionate air quality impacts was added (page 109).
- The original source of the data and methodology behind Figure 41 (urban heat islands in Portland) was added to the references (page 112).
- Tree preservation was added as a strategy in Action 14A, Decrease Urban Heat Islands.
- Action 14J Streamflow Temperature was modified to clarify that the goal of reducing temperatures in at least 50 percent of rivers and streams not meeting water quality standards was a 2030 target (page 114).
- References to floodplains and biodiversity were added to action 14L, Habitat Connectivity (page 114).
- The County's Department of County Human Services and the Health Department were added as lead agencies to action 14M, Urban-Wildland Interface Fires (page 114).
- Action 15A, Floodplain Maps, was expanded and clarified to outline a broader set of floodplain related actions beyond updating maps (page 115).
- Action 16G, Climate Migrants, was added to monitor migration trends and research the potential for accelerated regional population growth beyond current projections due to climate change (page 116).

10. Community Engagement, Outreach and Education

Summary of public comments:

- A. Commenters wanted more of a commitment to working with community partners and/or resourcing community-led climate action efforts/projects. Commenters also requested acknowledgement of the value of non-violent, direct action and community activism.
- B. Commenters recommended a more robust engagement plan that supports grassroots efforts to implement climate actions throughout the community.
- C. Commenters wanted to see more awareness building about the existence of the CAP, citing that most of the public doesn't know it exists and/or what individuals could be doing to address climate change.
- D. Commenters suggested that communities/neighborhoods should be empowered to make decisions and take actions to address climate change in ways that make sense for them. They proposed that the City/County fit the climate plan around community priorities and not expect communities to fit their priorities around the City/County carbon goals.
- E. Opportunities to work more closely with school systems, including general education and outreach, as well as creating internship and student project opportunities related to the climate plan, were discussed by several commenters. Others suggested that the City/County



offer free classes/workshops to learn about climate change (e.g., like the Master Recycler Program but focused on climate.)

Summary of staff response to public comments:

Commenters requested more commitment to working with community partners and/or resourcing community-led climate action efforts and projects. Objective 17 and the associated narrative, as well as some of the actions, were modified in response. The City and County currently engage with local schools in a variety of ways, including class presentations, internships, student projects, solar installations, etc., and will continue to seek additional engagement opportunities that are appropriate to the role of local government.

Changes of note include:

- Objective 17 was modified for clarity and additional narrative was added to address meaningful engagement, active community support, the value of community activism and the need to be responsive to community priorities (page 120).
- Action 17A, Alignment with Community Efforts, was modified to call out seeking resources to support community-based initiatives (page 120).
- Action 17B, Healthy, Connected Communities, was broadened to include supporting community projects and campaigns, not just events (page 120).

11. Local Government Operations

Summary of public comments:

- A. Commenters suggested several resource efficiency and conservation measures for government operations, including upgrading building lighting to LEDs and turning off fountains and splash pads in the summer.
- B. Commenters also suggested limiting the idling of City and County vehicles and equipment.

Summary of staff response to public comments:

Many of the suggestions from commenters related to local government operations are already underway. For example, numerous lighting upgrades in various City-owned buildings and facilities are currently in process. These include community centers, indoor swimming pools, parking garages, office buildings and fleet maintenance buildings. The City has also improved water efficiency of irrigation systems, fountains and public drinking fountains.

Changes of note include:

- Narrative about the City's renewed Sustainable City Government Principles and Environmental Performance Objectives, as well as the updated Green Building Policy was added (page 125).
- Reference to reducing light pollution and minimizing bird strike hazards was added to action 19E, Lighting Upgrades (page 126).
- Action 19H, Green Building, was edited for clarity (page 127).
- The County's Department of County Assets replaced the Office of Sustainability as a lead agency for action 19I, Energy Performance Tracking (page 127).
- Developing a County fleet strategy was added to action 19K, Fleet Fuel Efficiency (page 127).
- An action related to the divestment from fossil fuel companies was added as action 19T (page 128).



12. Appendices

Summary of public comments:

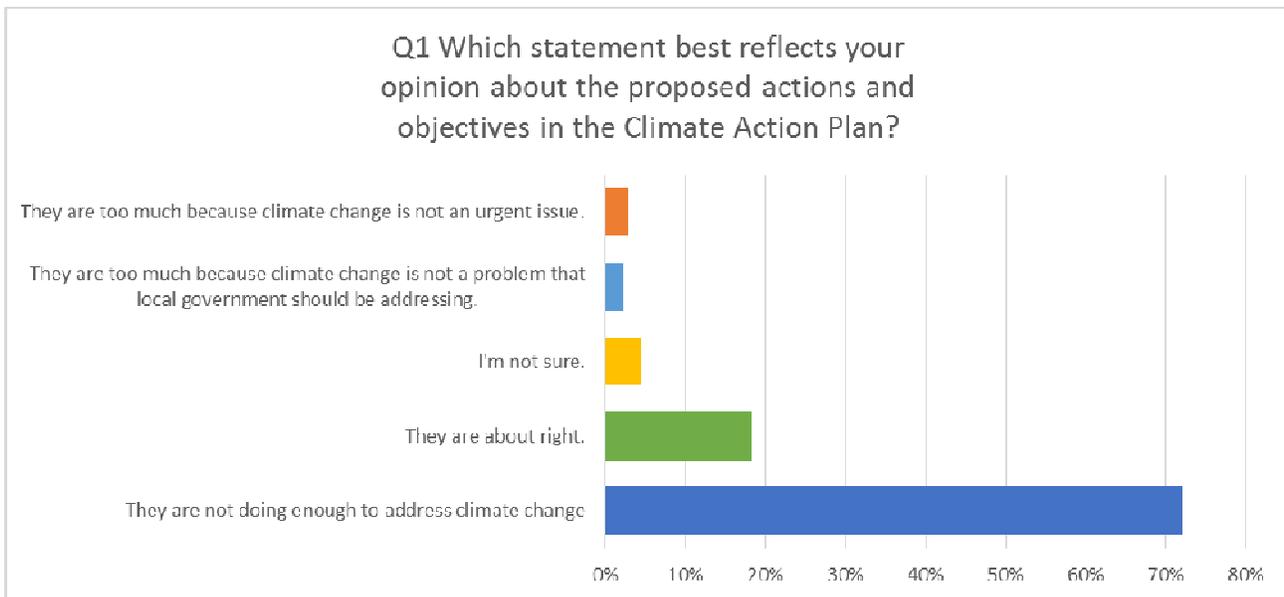
There were no significant public comments regarding the CAP appendices.

Changes of note include:

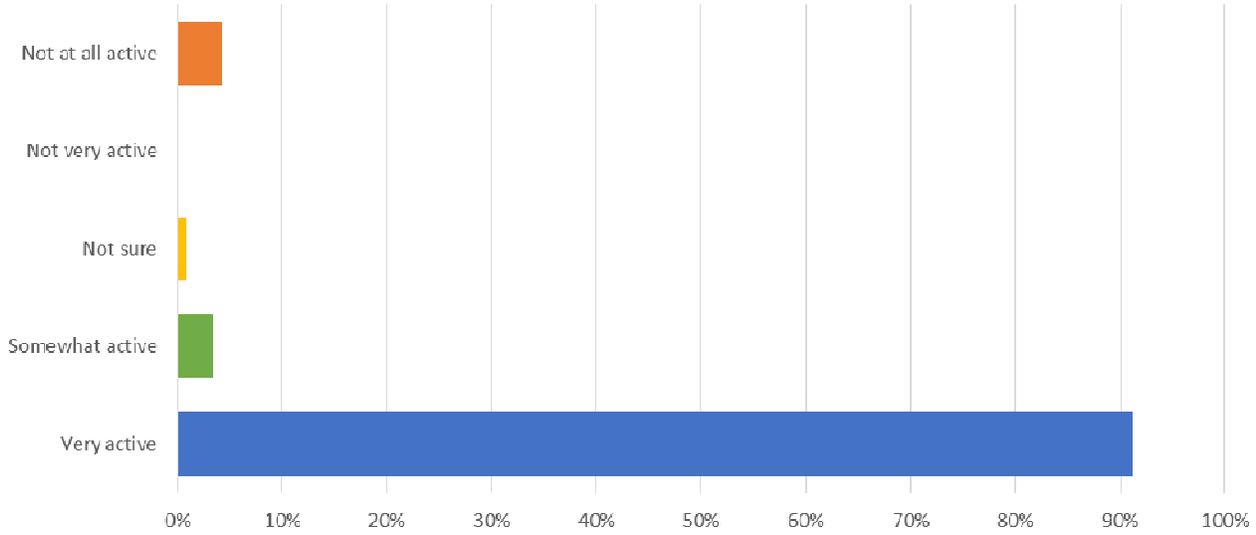
- The narrative around the methodology for the sector-based emissions inventory was updated to clarify the relationship to the consumption-based inventory and to update the units of measurement for carbon emissions text (page 151).
- The narrative related to fuel oil, propane and kerosene was updated (page 152).
- Additional references were added as needed based on other edits to the document (page 157 - 159).

Public Comments - Survey Responses

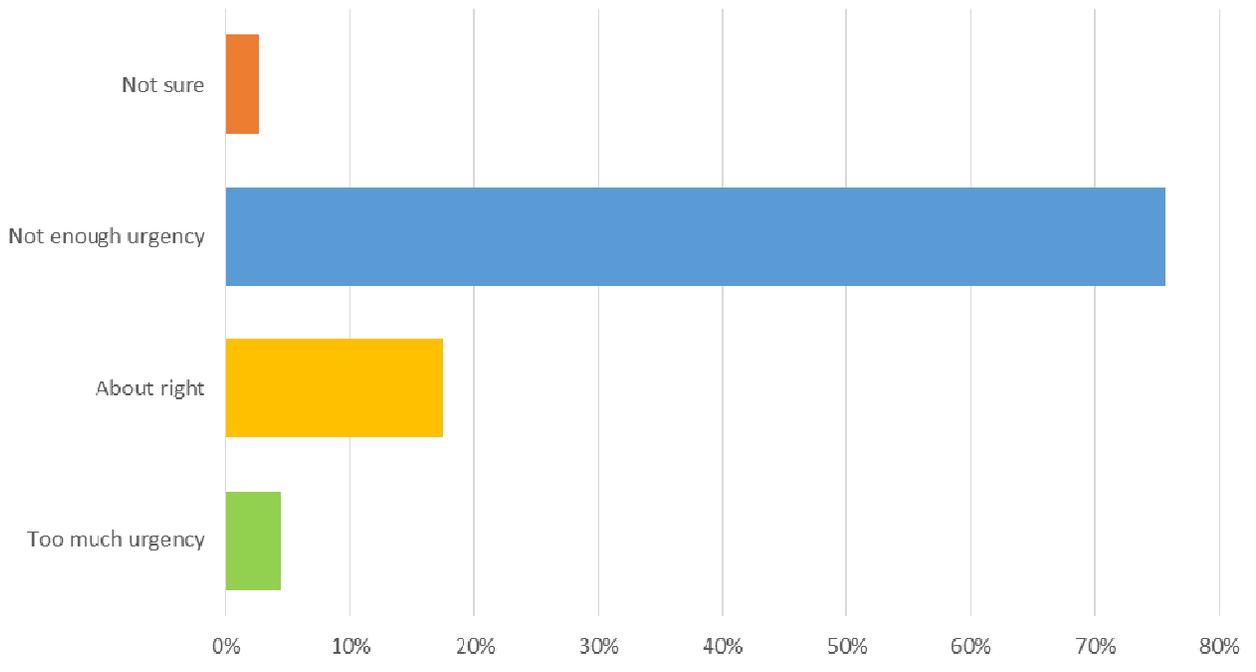
Respondents filled out over 150 surveys (combining long and short versions), either online or in person at one of the open house events. Narrative comments submitted through the survey have been considered and incorporated in the previous sections of this memo. Responses to other non-narrative survey questions are provided below.

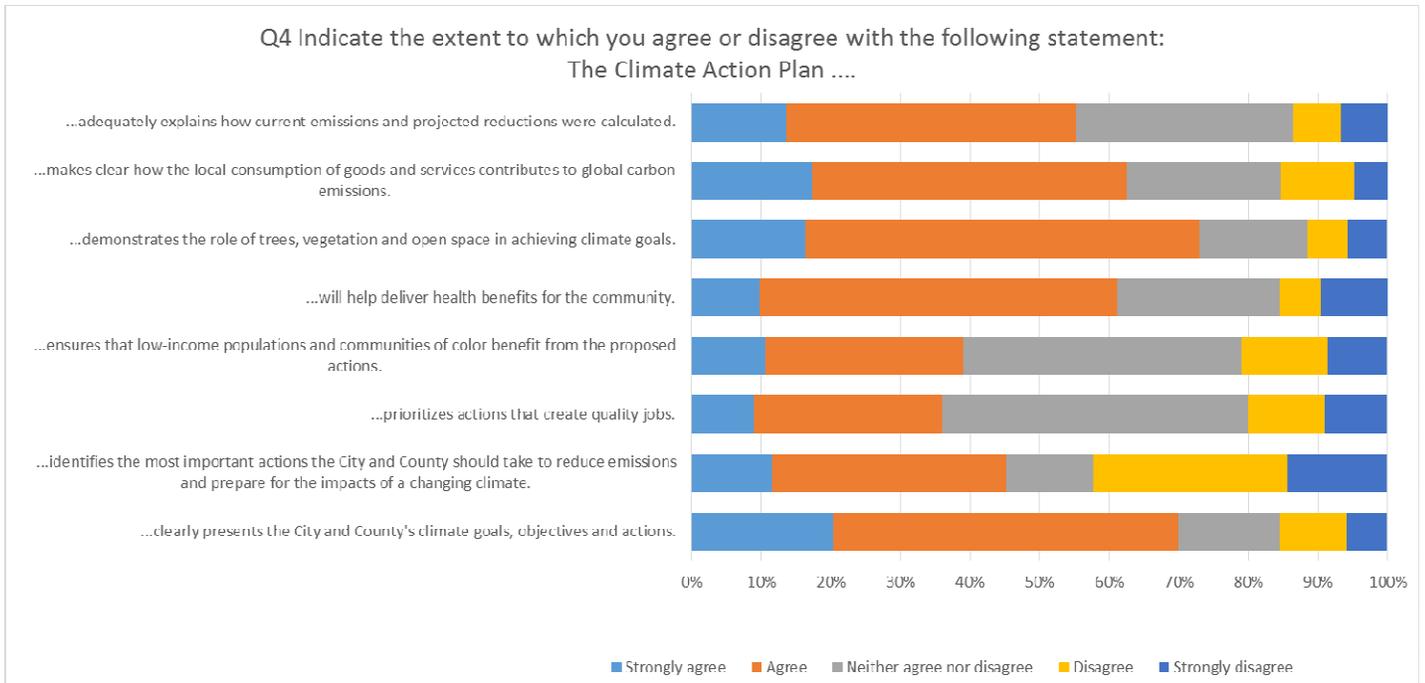


Q2 How active should the City of Portland and Multnomah County be in reducing the region's carbon emissions?



Q3 Considering the challenge of climate change, how would you rate the urgency conveyed by the Climate Action Plan?





Who We Heard From

Engagement opportunities

During the CAP public comment period (March 1 and April 10, 2015) staff received comments from approximately 450 individuals.

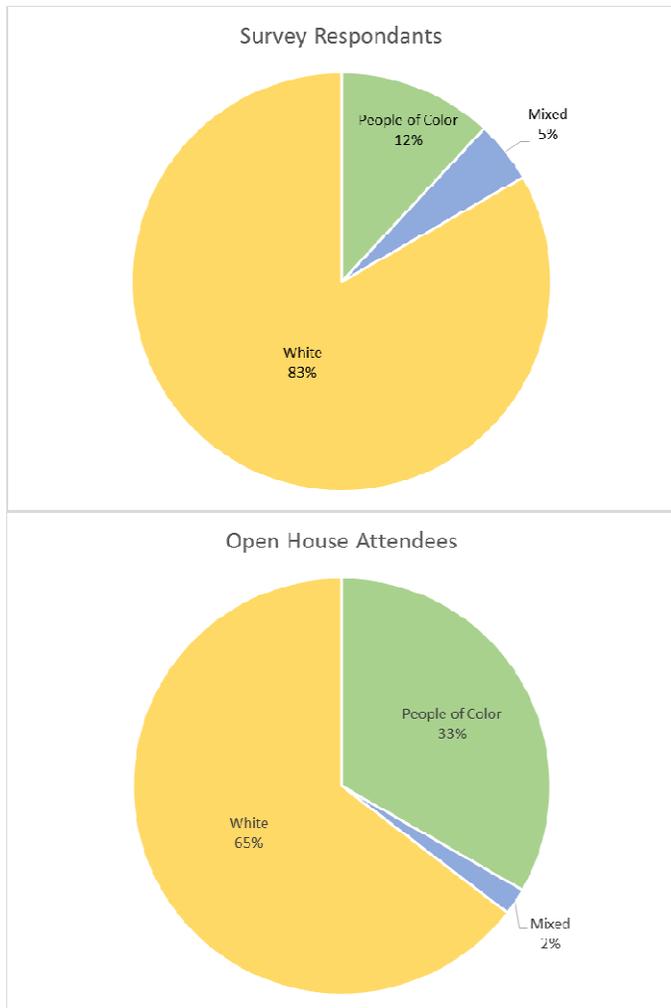
- A. Surveys: Over 150 surveys were filled out either online or in person at one of the open house events.
- B. Written Comments:
 - a. Over 55 unique sets of comments were submitted in writing by email.
 - b. 13 businesses public agencies and non-profit organizations submitted formal letters outlining their feedback.
 - c. Over 70 form letters based on recommendations from the Climate Action Coalition group of stakeholders were received (hardcopy or email).
 - d. Approximately 170 form letters related specifically to fossil fuel exports, particularly propane, were received in conjunction with hearings of the Portland Planning and Sustainability Commission (hardcopy or email).
- C. Open Houses: The City and County hosted two open house events. An event on March 19 at VeloCult bike shop was attended by over 30 people, and a March 24 event at the June Key Delta Community Center was attended by 25 people.
- D. Community Meetings and Presentations: Both before and during the public comment period staff met with or presented to various stakeholders and interested organizations, including non-profits, community organizations, university classes, other local jurisdictions, business and professional associations and networks, advisory groups and the faith community.

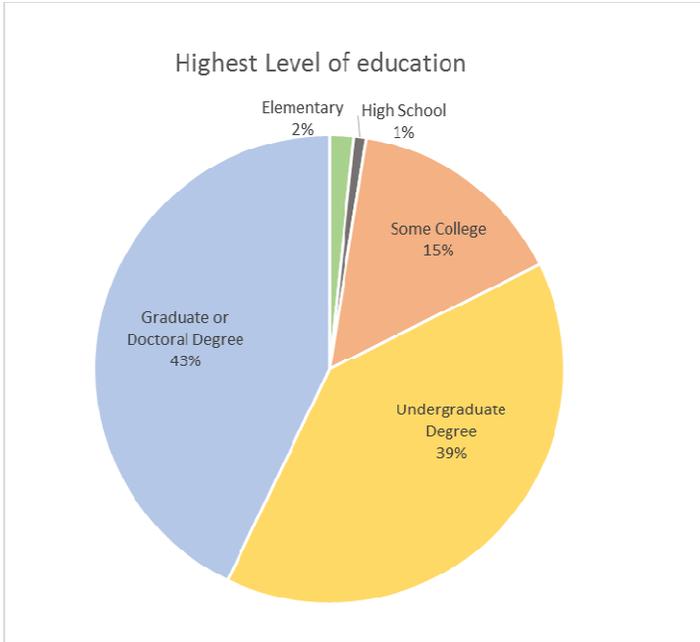


Demographics

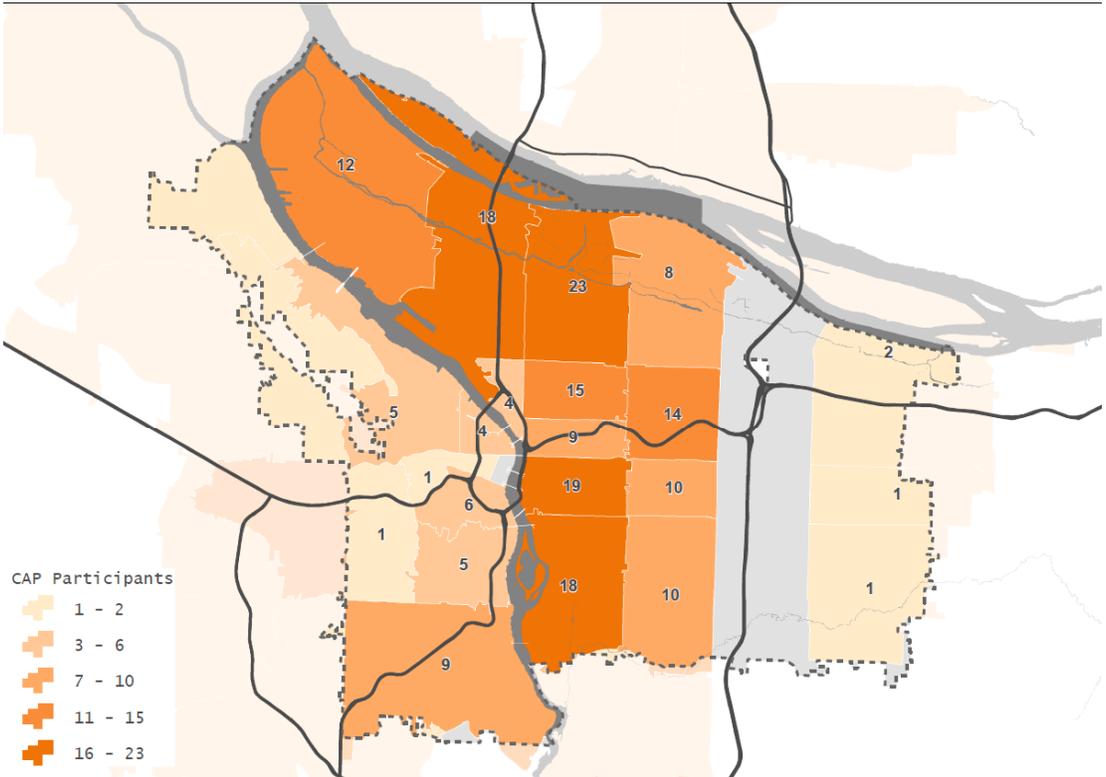
Demographic data (race and ethnicity, level of education and zip code) was requested from open house participants and survey respondents. Staff received over 130 demographic data responses.

The data indicate that respondents who answered the demographic questions were disproportionately well educated and residents of inner NE and SE Portland. Readers of the public comments contained in this document should keep in mind that, in all likelihood, **this summary memo does not reflect the full diversity of Portland**. People of color, younger and lower-income households may have additional perspectives or concerns.





Zip codes of survey respondents, open house attendees and many that provided written comment by email.



Climate Action Plan | Outreach & Engagement Participants
 City of Portland | Bureau of Planning and Sustainability | Geographic Information System
 The information on this map was derived from City of Portland GIS databases. Care was taken in the creation of this map but it is provided "as is". The City of Portland cannot accept any responsibility for errors, omissions or positional accuracy.
 April 20, 2015

