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December 11, 2019

Dear Chair Kafoury and Commissioners,

Thanks to the Multnomah County Board of County Commissioners (Board), County residents and businesses are benefitting from cleaner air and increased resiliency. HB 2007 (2019) will begin to phase out dirty diesel engines in the region and clean air construction standards are in place for County-related projects. County leadership is actively involved in shaping an active, clean transportation system and infrastructure as part of Metro's 2020 transportation measure planning process. Acknowledging the County's 2018 Environmental Justice Resolution as an important lens, the Advisory Committee on Sustainability and Innovation (ACSI) recommends the Board continue its pioneering efforts in 2020 with the following actions.

The County's Climate Action Plan and 100x50 Resolution

The County has actively engaged resident and business stakeholders around its 100x50 commitments, a 2015 CAP progress update is forthcoming, the County has plans to engage community stakeholders regarding the next CAP iteration, and the County is making solid, incremental changes in its sphere of influence. The Board must build on this momentum by tackling the County's internal commitments, acting where the County is a market participant or has local authority, and engaging community stakeholders to lay out a concrete plan and timeline for the next CAP update. This is an excellent opportunity to put into practice the values reflected in the Environmental Justice resolution by prioritizing the needs of and the meaningful public participation by environmental justice communities¹. This is also an opportunity to engage other jurisdictional partners. Without continued and substantial progress toward its aggressive goals, the County will instead face a crisis response to climate in-migration, lack of suitable planning or infrastructure, and unsystematic, costly, or temporary solutions.

2020 Legislative and Regulatory Advocacy Recommendations

ACSI supports the County's ongoing advocacy for statewide regulation of greenhouse gas emissions (GHG), including establishing a substantial and effective carbon price, dedication of revenues to emissions-reductions projects and transitions, preservation of Oregon's other environmental protections, and support for and investments in environmental justice communities (See ACSI's 2019 Recommendations letter for more detail). The County should also advance two other state-level initiatives:

1. Request the Legislature expand and fund Oregon's Vehicle Inspection Program (VIP). The VIP is credited with bringing the Portland Metropolitan Area into attainment with federal National Ambient Air Quality Standards (NAAQS) for carbon, ozone, and other combustion engine emissions. How-

¹Environmental justice communities include minority and low-income communities, tribal communities, and other communities traditionally underrepresented in public processes.

ever, ground level ozone levels have exceeded federal standards the past two years and transportation-related air pollution is on the rise. Even ozone levels below NAAQS can reach unhealthy levels, especially for vulnerable populations of children or the elderly. This is not just a public health threat; non-attainment will curtail economic and manufacturing activity and growth in the region. The County should support DEQ's request to increase VIP inspection fees to eliminate current program deficits and sustain the program. The County should also push to expand the VIP to include currently-exempt diesel powered vehicles with a manufacturer's gross weight rating of more than 8,500 pounds.

2. Support a citizen petition to Oregon's Environmental Quality Commission (EQC), requesting the EQC to vote in January 2020 in favor of directing the Oregon Department of Environmental Quality to use its existing authority to expand the regulation of indirect sources of emissions. Indirect sources of emissions are facilities, buildings, structures, or installations which indirectly cause mobile source activity (e.g. the movement of cars, trucks, equipment), that results in emissions of an air contaminant for which there is a National Ambient Air Quality Standard. The current application of the indirect source rule applies only to new construction of parking lots in certain urban areas. The petition requests that the state additionally regulate black carbon, diesel emissions, and greenhouse gas emissions from sites and facilities that produce high quantities of emissions from mobile sources (construction sites, distribution centers, railyards, ports, etc.). While the Clean Air Act preempts local regulation of mobile sources of emission, indirect source rules permit regulation of concentrations of mobile sources as if they were a stationary source. If the EQC fails to act, the County should enact its own indirect source rule.

2020 County and Regional Initiatives

1. Environmental Justice Baseline Study and Funding. Provide continued or additional funding for baseline studies on environmental justice in the County, requested by the Board in its Environmental Justice Resolution. Relevant baseline studies should include climate, energy, and resiliency, as well as the current transportation and transit systems.
2. Polluter-Funded County Air Quality Council. Cleaner Air Oregon, the implementation of additional local air quality rules, and heightened community awareness provides unprecedented opportunity for community engagement with local businesses, regulators and governments. Modeling an initiative after the state Watershed Councils, the County should direct Environmental Health Services to create and lead a community-based, voluntary, non-regulatory group to engage in the highly technical risk assessment and mitigation strategy development needed in order to reduce dangerous toxic hot spots in the County. This effort to restore and enhance air quality, and similar Environmental Health work on environmental hazards, should be funded through fees assessed on polluting industries and operators of vehicles and equipment that put public health at risk.
3. Utility Integrated Resource Plans. Work with utilities to quickly phase out more costly coal for cheaper resource options, such as energy efficiency, demand responses, and renewable options. If the County is unable to secure commitments from utility providers, consider any feasible alternatives for the County to meet its 2035 commitment for 100% renewable electricity. The County should advocate that utilities retire high carbon sources, rather than redirecting that power, in a way that provides a just and clean transition for those workers and communities (job training, addressing ash ponds, etc.).
4. Transit Service Enhancement. Service enhancement, funding sources, and fare affordability are not being comprehensively addressed. It is not a current TriMet priority and Metro views this as outside of its transportation role. While continuing valuable contribution and oversight across other transportation programming, the County should work with TriMet, Metro, and other jurisdictions to evaluate stable, consistent transit funding in order to increase transit service and reliability for the region, which is essential to increase ridership,

reduce congestion and vehicle trips, and meet the County's CAP, 100x50, and Environmental Justice Resolution commitments. Consider a variety of fees to specifically fund transit and generally support the County's transportation values.

5. Woodsmoke Curtailment Program. Fund a one-time public education and neighborhood outreach program to expand public awareness on "ambient" burning and the woodsmoke curtailment ordinance. Improve relevant data by expanding the County Environmental Health database system to request whether restaurant license applicants use wood smokers, grills, pizza ovens, or other wood devices.
6. Dirty Lawn and Garden Equipment. Two-stroke gasoline engines emit approximately "770 times as much particulate matter per horsepower-hour as new heavy-duty trucks" and one hour of lawn mowing "emits the same amount of pollution as driving a car 200 miles."² Given the substantial public health returns, the County and its contractors should immediately replace all combustion lawn and garden equipment with battery or electric powered alternatives. The County should encourage other jurisdictions and commercial service providers to do the same. In 2020 the County should investigate a regulatory and/or rebate approach to limit or phase out the use of lawn and garden equipment most harmful to public health and the environment. Any approaches studied should take into consideration public health, worker health and safety, equity and the economics of transitioning away from these types of equipment.
7. Metro's T2020. Continue engagement and review of the corridor project proposals and regional investments, in order to ensure each meets with the County's transportation values (See ACSI's August 2019 T2020 letter for more detail)
8. PCEF. Engage and educate the Portland Clean Energy Fund's board and staff about various County and regional programs and resources existing and available to support PCEF's work, as well as opportunities to leverage County efforts through PCEF.

Thank you for the opportunity to advise the County on these issues and we look forward to working with the Board and County on these and additional policy areas as needed.

Sincerely,

Your 2019 ACSI Members

Encl: 2019 ACSI Recommendations
August 2019 ACSI T2020 Letter

² Amelia Schlusser, et al, Deconstructing Diesel: A Law and Policy Roadmap for Reducing Diesel Emissions in the Portland Metropolitan Area p.67 (July 2019).

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November 29, 2018

Dear Chair Kafoury and Commissioners:

The Advisory Committee on Sustainability and Innovation (ACSI) commends the Multnomah County Board of County Commissioners (Board) on several notable achievements this year that will improve the welfare, prosperity, and resiliency of County residents and businesses: adopting a clean diesel contracting policy and a wood smoke curtailment ordinance; financing the first energy efficiency project under the PropertyFit Program, a model property-assessed clean energy program for Oregon; advocating for expanded transit service and clean energy buses; and passing an environmental justice resolution to provide guidance within the County's work and to engage and protect the County's environmental justice communities¹. ACSI respectfully submits the following policy recommendations to further the County's work programs and commitments.

Recommendation I – 2019 County State Legislative Agenda

In the next legislative session ACSI believes the County should advocate strongly for:

1. Legislative action to quickly and dramatically reduce greenhouse gas emissions (GHG) in Oregon – we have no time to waste as we fight to reduce the impacts of climate change globally and locally. While any climate policy passed at the state level must establish a substantial carbon price to be effective, ACSI believes a state policy should also preserve the strength of Oregon's other environmental protections and, in keeping with the recently passed environmental justice resolution, prioritize the needs of environmental justice communities. If the state continues to pursue a cap-and-trade program over a carbon tax or cap-and-fee program, the cap-and-trade legislation should:
 - a. Contain a policy commitment and dedication of revenues to support real, additional, permanent, and verifiable emissions reductions;
 - b. Provide a just transition for front line workers and communities that are disproportionately impacted or traditionally disenfranchised;
 - c. Commit new, constitutionally limited highway trust fund dollars solely to projects that will reduce emissions from the transportation sector;
 - d. Prohibit the issuance of free allowances to covered entities;
 - e. Constrain the lifespan of credits and/or constrain the banking of credits, so that future emissions caps are not undermined;

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- f. Expressly provide that credits are not property rights, or alternatively that the Legislature and/or DEQ may adjust the cap as necessary without having adjustments deemed to have impacts on property rights; and
 - g. Use cost containment measures other than offsets and/or limit the use of offsets – ideally to no more than two percent of the total available credits, but certainly no more than California allows.
2. Allocation of VW settlement proceeds that prioritize reduced exposure to diesel pollution, including funding for the clean diesel procurement program, pursuant to the settlement’s framework and the Court approved DEQ “VW Environmental Mitigation Plan for the State of Oregon,” which highlights the importance of using the funds for human health benefits.
 3. Comprehensive statewide diesel legislation that will phase out the use of dirty diesel engines and prevent the importation and use of equipment in Oregon that is prohibited in California.
 4. Establishment of a Clean Technology Sector Development Fund and grant program.

Recommendation II – County and Regional Policy

ACSI recommends the Board continue evaluating the use of a local air district, as well as partnerships with universities, governments, and others, to monitor and protect our air quality. ACSI also recommends the following specific actions to foster safe and healthy communities:

1. Implement final Clean Air Construction Standards and increase their impact by reducing the equipment horsepower thresholds from 100hp to 25hp, shortening the phase-in time line and tightening the exemption criteria. Consider extending the clean diesel mandate to County licensed waste haulers serving unincorporated Multnomah County.
2. Magnify the impact of the Clean Air Construction Standards by working with partners to encourage ODOT, other local jurisdictions, and private sector adoption.
3. Support the wood smoke ordinance through the use of one-time only funding for FY 2020 to develop a social marketing public education and neighborhood outreach campaign on “ambiance” burning. Over a longer term, develop, fund, and roll out a woodstove change out program. Finally, improve relevant data by expanding the County Environmental Health

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database system to request whether restaurant license applicants use wood smokers, grills, pizza ovens, or other wood devices.

4. Explore the legal viability of expanding Portland's Home Energy Score program to all of Multnomah County, which would profile the County's weatherization program achievements and incentivize new projects. An Office of Sustainability study demonstrated substantial benefits – over \$250 utility savings and 11,000 pounds of carbon dioxide reductions per household – from implementing, monitoring, and enforcing the expanded program.
5. Improve coordination of state, County, and city residential energy and health performance, lead abatement, critical home repair, and aging-in-place programs, similar to the national Green and Healthy Homes Initiative model, to increase households served and administrative efficiencies by aligning funding streams, program goals, and eligibility requirements. Identify one-time only funding in the 2019 budget for a pilot project to achieve combined energy, safety, and health goals through a single, coordinated home intervention.
6. Engage with the Portland Clean Energy Community Benefits Fund Committee, City of Portland, programming nonprofits, and other stakeholders on potential clean energy projects and job training initiatives resulting from the Portland Clean Energy Initiative.

Recommendation III – Shape an Active, Clean Transportation System and Infrastructure

In order to meet the County's CAP and "100 by 50" commitments, ACSI believes the County must work with stakeholders to integrate those goals in the region's transportation planning and projects. Transportation of goods and people accounts for 40% of GHG in the County. The average County resident drove 17 miles per day in 2015; the same 17 miles per day measured in 1990. Forty percent of Portlanders do not have safe and convenient access to transit, commercial services, jobs, or, in many areas, even sidewalks. This is especially true in East Portland and East County, areas historically underserved by infrastructure and services and home to many low-income households and a large youth population. Courageous leadership is needed to transition to a clean energy transportation system, reduce and shift single occupant vehicle trips to other modes such as transit, walking, or bicycling, and to prioritize the transportation needs of those with the fewest options. ACSI recommends the County:

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1. Engage in regional and state conversations to prioritize transportation revenue spending that will meet the County's CAP and "100 by 50" commitments, including its emissions-reductions, clean energy, service enhancement, transit equity, and mode-shifting goals. In a resource-constrained environment, new and distinct resources and investment approaches are also needed to pursue these climate, health, and service equity goals simultaneously and with equal importance. In 2019, the County has two significant opportunities to prioritize investment that meets these goals: the use of Clean Energy Jobs funding related to transportation and 2020 Metro regional transportation financing discussions.
2. Advocate to improve transit service while reducing emissions with new or underutilized approaches. Transit service levels were brought closer to pre-recession levels by funding from HB2017, but many service needs remain unfunded. In addition to direct service expansion, planning integration and investments in the Enhanced Transit Corridor concept, priority bus lanes, and signal prioritization can improve transit/transportation speed and efficiency. Programs that reduce vehicle trips, increase transit access and help grow ridership, such as Youth Pass, should be equitably expanded countywide and fully funded.
3. Continue to support the decarbonization of personal, fleet, and transit vehicles while promoting the health and climate benefits of reducing private vehicle use. Despite significant population and economic growth, our overall transportation emissions have remained in line with 1990 levels – not as a result of changing behaviors, but as a result of cleaner internal combustion engines. While personal electric vehicles represent a substantial opportunity to continue leveraging technological improvements for GHG reductions, they will not address congestion, decrease vehicle trips, are not accessible to all in the community, and are not necessarily operating on clean or renewable sources of power. TriMet's commitment to transition to diesel-free buses is promising; the County's advocacy is essential and should also ensure those buses operate on energy from clean and renewable sources. Where the County has the opportunity to weigh in on regional transportation discussions related to TriMet's transition, such as JPACT or R1 ACT, the County should ensure that transition costs do not supplant needed service enhancements and additions that benefit the community. As bus electrification comes on line, it must be prioritized for deployment in areas with the worst air quality. Long-term planning and increased and innovative funding strategies will be necessary to transition to clean and renewable vehicles quickly and equitably.

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The next five years will be critical in determining whether our transportation system will be on track to support the County's climate, health, and service equity goals, and achieve those goals in ways that are just and equitable. Whether congestion pricing, carbon pricing, regional transportation financing or road investments, it is imperative that the Board use all their individual and collective authorities and influence to ensure a just and sustainable foundation is laid.

Thank you for the opportunity to advise the County on these issues and we look forward to working with the Board and County on these and additional policy areas as needed.

Sincerely,

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August 1, 2019

Dear Chair Kafoury and Commissioners,

In its 2018 and 2019 annual policy recommendations, the Advisory Committee on Sustainability and Innovation (“ACSI”) urged the Board of County Commissioners to work with other agencies to shape an active and clean regional transportation system and infrastructure targeting emissions reductions, clean energy, service enhancement, and mode-shifting goals. We believe that opportunity is here. As you are aware, Metro is engaged in a planning process for a 2020 transportation ballot measure (“T2020”) in which Commissioner Vega Pederson is serving as a Co-Chair of Metro’s T2020 Transportation Funding Task Force (“Task Force”).

In early June, the Task Force presented a recommendation letter and staff memo to Metro identifying corridors of interest for regional investment. This summer Multnomah County and other agencies will develop project proposals for those corridors that advance the outcomes and values adopted by Metro and the Task Force. In addition, the Task Force is currently meeting regarding potential regionwide investments, as compared to specific corridors, that may include projects or programs aimed to substantially improve access, equity, safety, reliability, and resiliency in the regional transportation network.

These planning activities are an important opportunity for Multnomah County to submit and support innovative project proposals for corridors within the County, to weigh in on other transportation investments in the region, and to ensure that investments further the most climate positive elements in Metro’s Climate Smart Strategy and Multnomah County’s own Climate Action Plan, “100x50” resolution, and environmental justice resolution commitments.

ACSI’s Transportation Values

Our values stem from the County’s existing, aggressive commitments. In the Climate Action Plan, the County acknowledges substantial emission cuts from human activity are needed. CAP p.71. Specifically regarding transportation, the County prioritized completing transportation networks, including bikeways and other active transportation, TriMet service enhancement and Youth Transit Pass, increased transit coverage and efficiency, and improved safe routes and street connections. (CAP Objectives 4 & 5) The County also prioritized planning for systems and infrastructure for electric vehicles, mobile transportation services, and better highway management. (CAP Objectives 6 & 7)

The County reiterated its goals in the “100x50” resolution by committing to meet 100% of the community’s energy needs with renewable energy by 2050, to be accomplished by: guiding regional investments to “active and public transportation infrastructure”, expanding transit networks and access, and transitioning to clean energy transit options. Resolution 2017-046, p.4-5, 1, 11-12. In 2018, the Board resolved to apply an environmental justice lens to County work and to seek opportunities to improve County practices. Resolu-

tion 2018-108, p.3, 2.b

The outcomes and values guiding Metro's planning process are generally aligned with the values ACSI endorsed in its 2018 and 2019 policy recommendations. This includes recognizing the link between transportation and air quality, and the significant impact to public health that results from the combustion of diesel and gasoline, with those impacts falling hardest on the County's most vulnerable communities. ACSI believes the following elements in a transportation measure will be most successful in achieving our climate and sustainability goals, and should be supported:

- Expanded public transit: More hours, frequency, weekend service, bus lines, enhanced transit corridors, bus signal priority, and dedicated bus lanes to increase reliability.
- Reduced single occupant vehicle trips: Pricing to manage congestion in the region, applying any congestion revenues to transit or safety in underserved communities, and investing in ADA/walking/bicycling infrastructure to connect communities to transit.
- Climate and resiliency goals: Electrifying transit, fleet, and private vehicles, and building clean energy infrastructure.
- Environmental justice and equity commitments: Connecting transportation investments with affordable housing and infill, expanding youth pass, and eliminating transit fare increases.
- No investments in roadway capacity expansion other than in support of "complete streets" including additional public transit and active transportation infrastructure.
- Consideration for how the T2020 process can support the Albina Vision Project without the related highway capacity expansion.

Multnomah County Corridor Projects

In line with Metro's values and the County's own climate and transportation commitments, ACSI urges the Board 1) to direct County Transportation Division staff to develop innovative corridor project proposals for those corridors within their purview and 2) to encourage other jurisdictions, especially those within Multnomah County, to do the same. This may involve more upfront planning but it should make the proposals more competitive – the Task Force reserved the right to review project proposals against Metro's requirements before approval – and will help leverage other resources to meet the CAP, 100x50, and environmental justice commitments.

Metro Regional Program Investments

ACSI believes that regional T2020 investments can lay the groundwork to transform our current systems into an efficient, economic, clean, and equitable model transportation system. Key investments must be made to increase active transportation options and increase transit service and ridership, which depends on expanded service options at level, reduced, and even free fares on cleaner transit vehicles. ACSI hopes the Board will take an active role lobbying for holistic, community investments to promote this goal, rather than an "either-or" or a "trade-off" approach.

ACSI also recognizes that housing security, economic opportunities, and transportation are inextricably linked. A corridor approach to transportation projects is a logical approach, but ACSI asks the Board to strongly advocate for regional program investments that will help ensure that transportation project investments will benefit households that are already housing and economically insecure.

These ongoing regional program investments should include:

- Land banking for affordable housing, especially linked to transit investments such as SW Corridor / Division

Transit Project to address displacement and provide housing options for all income levels in high opportunity areas.

- Funding for infrastructure and programs separate from corridor-specific projects, including regional sidewalk infill that supports Safe Routes to Schools and connections between affordable housing and transit.
- Stable funding for transit service operation expansions, prevention of any fare increases and maintenance of existing low income and youth fare programs, while striving to reduce or eliminate fares.
- Transition to clean, zero carbon transit vehicles deployed first through service expansion and in areas experiencing poor air quality.
- Encouraging/requiring low-carbon fuels in solid waste disposal by funding alternative fuel charging/fueling infrastructure at transfer stations, landfills, and/or other key locations.

The County should seek and support financing mechanisms for the transportation measure that do not unduly impact low-income communities. The County and the region should not be bound by current or perceived limitations in transportation funding mechanisms. For example, as Oregon Supreme Court precedent regarding the Oregon Constitution, Article 9, Section 3(a) is evolving, we encourage the County to ensure that more funding from the measure will go towards transit improvements and the development of pedestrian and cycling infrastructure located outside the highway right-of-way.

Transportation systems and infrastructure planned and built today will impact Multnomah County for generations, and ACSI believes the Board and County staff should take a bold and proactive role in shaping the projects and programs to be included in T2020. Thank you for your commitment to these issues and your consideration of this letter.

Sincerely,

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