

From: [Patricia Farrell](#)
To: [Amy Johnson](#)
Cc: [Robert Romanek](#)
Subject: FW: Oppose Salem Climate Action Plan Costly Strategies
Date: Monday, December 6, 2021 6:47:43 AM

-----Original Message-----

From: Brent Culver <brent@brentculver.com>
Sent: Friday, December 3, 2021 3:18 PM
To: SalemCAP <SalemCAP@cityofsalem.net>
Subject: Oppose Salem Climate Action Plan Costly Strategies

Dear Salem Climate Committee,

As a resident of Salem, I am writing to voice my opposition with the costly requirements of certain recommended strategies included in the draft Climate Action Plan.

You should not force property owners to make expensive upgrades based on energy rating system criteria. There should not be a ban on natural gas - property owners should have the choice to use natural gas or electricity. All of these strategies should be voluntary, rather than mandatory, since they are not affordable for all income groups.

While I understand the City is taking steps to address climate change and can support many of the proposed strategies, this should not be forced on property owners who are on a fixed income (seniors), are first time home buyers (costs will be passed on with the purchase), owners of single rental properties, or small business owners. There has been no consideration if the strategies are cost effective, practical, and affordable. There has also been no cost/benefit analysis - not just costs to the city to implement, but real-world cost for property owners.

If these are mandatory, it will further impact the housing crisis, especially affordable housing (ownership & rentals), and will drive commercial and residential property owners out of Salem. The ban on natural gas could put lives at risk as natural gas provides a resilient source of heat & cooking during power outages and a ban will negatively impact low-income populations least able to afford alternatives.

Please remove from strategies all requirements, which force property owners to participate in energy benchmarking or scoring programs and to make expensive upgrades and allow property owners to choose natural gas or electricity.

Sincerely,

Brent Culver
1674 Pelican Ct NW
Salem, OR 97304
brent@brentculver.com

From: [Robert Romanek](#)
To: [Amy Johnson](#)
Cc: [Patricia Farrell](#)
Subject: FW: Oppose Salem Climate Action Plan Costly Strategies
Date: Friday, December 3, 2021 11:53:09 AM

Amy,

I am forwarding public comment.

-Rob | 503-588-6211 ext. 7385

-----Original Message-----

From: Craig Evans <craig@crowrealestategroup.com>
Sent: Friday, December 3, 2021 11:44 AM
To: SalemCAP <SalemCAP@cityofsalem.net>
Subject: Oppose Salem Climate Action Plan Costly Strategies

Dear Salem Climate Committee,

As a resident of Salem, I am writing to voice my opposition with the costly requirements of certain recommended strategies included in the draft Climate Action Plan.

You should not force property owners to make expensive upgrades based on energy rating system criteria. There should not be a ban on natural gas - property owners should have the choice to use natural gas or electricity. All of these strategies should be voluntary, rather than mandatory, since they are not affordable for all income groups.

While I understand the City is taking steps to address climate change and can support many of the proposed strategies, this should not be forced on property owners who are on a fixed income (seniors), are first time home buyers (costs will be passed on with the purchase), owners of single rental properties, or small business owners. There has been no consideration if the strategies are cost effective, practical, and affordable. There has also been no cost/benefit analysis - not just costs to the city to implement, but real-world cost for property owners.

If these are mandatory, it will further impact the housing crisis, especially affordable housing (ownership & rentals), and will drive commercial and residential property owners out of Salem. The ban on natural gas could put lives at risk as natural gas provides a resilient source of heat & cooking during power outages and a ban will negatively impact low-income populations least able to afford alternatives.

Please remove from strategies all requirements, which force property owners to participate in energy benchmarking or scoring programs and to make expensive upgrades and allow property owners to choose natural gas or electricity.

Sincerely,

Craig Evans
1962 Linwood St NW
Salem, OR 97304
craig@crowrealestategroup.com

From: [Ian Davidson](#)
To: [citycouncil](#); [CityRecorder](#)
Cc: [Patricia Farrell](#)
Subject: Support of City Climate Action Plan
Date: Saturday, December 4, 2021 7:04:26 PM
Attachments: [CAP Letter of Support Davidson Cherriots.pdf](#)

Mayor Bennett and City Councilors,

Enclosed you will find my written testimony in support of the City's Climate Action Plan. It has been a pleasure to serve on the Climate Action Plan Task Force and I look forward to our governments partnering to implement this Climate Action Plan.

Best regards,

Ian Davidson
Board President
ian.davidson@cherriots.org

December 03, 2021

Salem City Council
555 Liberty Street SE
Salem, OR 97301

Mayor Bennett and City Councilors:

I am writing in support of the City's Climate Action Plan.

For the last year, I have served on the City's Climate Action Plan Task Force. This advisory body, appointed by the mayor, was broad and was generally representative of our community. The Plan you have before you is the result of hundreds, if not thousands, of hours of work by committed community members and subject matter experts, including city staff, hired consultants, staff from community organizations, and staff peer governments.

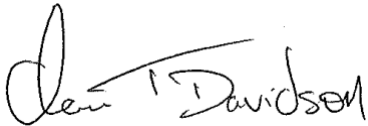
We were tasked with developing a plan that charted a path forward for the City to meet the greenhouse gas goals adopted by you, the City Council. I believe we have accomplished that goal. While a significant amount of work went into the development of this plan, the next step, implementation, will be the hardest.

As noted throughout the Climate Action Plan, the transportation sector is the largest source of planet-warming pollution. Public transit, as noted in the modeling, is a ready-made solution to reducing our community's greenhouse gas emissions. The models anticipate a quadrupling of public transit ridership to accomplish the council's goals. We are ready to partner with the City to achieve this goal. Thoughtful consideration and creativity will be needed to accomplish it, but I am confident that it is an achievable goal. Cherriots is ready to partner with you so that collectively we can reduce pollution, improve livability, and ensure equity.

Independently, we are undertaking plans to transition our fleet to zero-emission vehicles by 2040 and we are on pace to accomplish that. We will also be adopting our own climate action plan for our agency focused on internal operations.

Thank you for making addressing climate change a priority for the City. I look forward to working with you on this important issue in the years to come.

Sincerely,

A handwritten signature in black ink that reads "Ian T. Davidson". The signature is written in a cursive style with a large initial "I" and a distinct "T" before the last name.

Ian T. Davidson
Subdistrict Five
Cherriots Board of Directors

From: [Em Eide](#)
Sent: Wednesday, December 01, 2021 8:02 PM
To: [SalemCAP](#)
Subject: Testimonial for Salem Climate Action Plan

Hello all,

My name is Em Eide, and I am submitting this testimonial in favor of the Salem Climate Action Plan. As the capitol of Oregon, I believe it is our responsibility to dutifully organize and lead environmentally conscious plans to better support our community. There is no doubt that the influx of our Salem population (high-lighted in the Climate Action Plan) will lead to consequences to the local environment be it bridge traffic, increased trash production, and increased consumption in energy. Overall, this will cause a necessity to spend more and more city funds for being used to maintain the cleanliness of our spaces, and causing more community members (especially our lower-income neighbors) to be negatively impacted. Ideally, we would like to ensure the longevity of resources in our community, and to be taking productive steps to prevent further and future environmental damage.

I hope you all consider this when considering the Climate Action Plan.

Thanks.

--

Em Eide (they/them/theirs)
Willamette University Class 2024
Psychology and Spanish Majors

From: [Carol Long](#)
Sent: Wednesday, December 01, 2021 9:40 PM
To: [citycouncil](#); [Patricia Farrell](#); [SalemCAP](#)
Subject: Letter of support for Salem CAP
Attachments: City Council letter.pdf

Dear friends,
Please find attached a letter of support for the city's Climate Action Plan, and thank you for all of your work and consideration.

Best regards,
Carol Long

--

Carol S. Long
Provost and Senior Vice President
Willamette University
310 Putnam University Center
900 State Street
Salem, OR 97301
503-370-6623
FAX 503-375-5398



Office of the Provost
Carol S. Long
900 State Street, Salem, OR 97301

clong@willamette.edu
willamette.edu
503-370-6623 Office

Mayor Chuck Bennett
citycouncil@cityofsalem.net

Patricia Farrell
Project Director, Salem Climate Action Plan Task Force
PFarrell@cityofsalem.net
SalemCAP@cityofsalem.net

Dear Mayor Bennett, Ms. Farrell, and Salem City Councilors,

I am writing to express support from Willamette University for the new Salem Climate Action Plan (CAP) and the City Council's goal to reduce greenhouse gas (GHG) emissions 50% by 2035 and be carbon neutral by 2050. The development of a Salem CAP has already reinvigorated campus conversations about the possibilities and priorities to reduce emissions in an equitable way.

Professors Joe Bowersox and Janet Lorenzen were on the Task Force that drafted the CAP and they recognize great opportunities for future collaborations as the city and the University share ideas and aspirations around climate action. Willamette students, both undergraduate and graduate, can work on mitigation and resiliency strategies including educational campaigns for zero waste, data collection and management, a green purchasing plan, outreach and translation services to Latinx residents, and efforts to expand the local tree canopy. We appreciate and want to enable a climate justice lens that supports the resilience and well-being of the city and of Salem's most vulnerable residents.

Willamette University has had a Climate Action Plan since 2010 with continuing revisions and emendations as our capacity and understanding have changed. We acknowledge the great effort and dedication necessary to respond to the climate crisis, and we support the City of Salem's approach that also focuses on what is necessary based on the best available science.

Our students, staff, and faculty have long wanted a more robust bus and bike system that would offer them more ways to reach campus and move around the city. Prioritizing these efforts will help Willamette with our goal to reduce vehicle miles traveled and emissions due to commuting. We recognize that transportation accounts for the majority of Salem's emissions and support policies to address this.



Office of the Provost
Carol S. Long
900 State Street, Salem, OR 97301

clong@willamette.edu
willamette.edu
503-370-6623 Office

Willamette University also shares a commitment to green buildings, energy efficiency, and fuel switching and supports the city's prioritization of these strategies to address emissions.

There is no better time to support a city-wide CAP, both because time is running out to reduce emissions, and because the Governor's Executive Order on climate and equity has opened up resources to the city that can support these efforts. Finally, please reach out to us with information and questions as these CAP programs roll out so that we may do our best to support them.

Best Regards,

A handwritten signature in black ink that reads 'Carol S. Long'.

Carol S. Long
Provost and Senior Vice President

From: [Patricia Farrell](#)
To: [Amy Johnson](#)
Cc: [Robert Romanek](#)
Subject: FW: Climate Action Plan: Public Comment
Date: Monday, December 6, 2021 2:42:17 PM

From: Catalina de Onís <catadeonis@gmail.com>
Sent: Monday, December 6, 2021 2:03 PM
To: SalemCAP <SalemCAP@cityofsalem.net>
Cc: Catalina de Onís <catadeonis@gmail.com>
Subject: Climate Action Plan: Public Comment

Warm Greetings, City Council Members:

I write as a community member of Salem who also lives in our capital city. Thank you to the numerous individuals who contributed to the Climate Action Report and thanks to you, Council Members, for taking the time to consider this crucial, urgent proposal.

As a professor who researches and teaches environmental and energy communication, this Climate Action Plan is foundational for working toward a more sustainable and just present and future in our city and in the surrounding areas. First and foremost, **I urge the swift approval of this Plan**, so that it's important steps can be implemented, given the urgent need to transform unsustainable electric energy and transportation systems, among others. In particular, **I'd like to call attention to the equity components of this document**. For example, the report discusses "[i]ntentionally and thoughtfully engag[ing] historically excluded communities throughout future planning and implementation efforts related to climate action strategies." As my research indicates, and as I know Council Members are aware, such a commitment is vital for addressing inequities by centering alternative perspectives and experiences to transform relationships *both technically and socially*. On page 55, the report reads that "the City must maintain clear and consistent communication with residents... As with all implementation efforts, communication about progress should be inclusive and accessible." Given recent public health problems and climate-related extreme weather events in our community, the City has had several opportunities to think through what this communication can look like and why it's so important for environmental and climate justice. The recent fires, ice storms, and heat waves have revealed the urgent work of centering non-English languages, multiple cultures, and low-income individuals to avoid making assumptions about different groups so that every single person can survive and live a good life in the Willamette Valley. In addition to equity and social justice concerns, **I wish to highlight the importance of the plan's efforts to avoid reliance on "natural" methane gas**. As many know, methane gas is a major contributor to greenhouse gas emissions and its heat-trapping potential and toxic life-cycle are deeply concerning. This fossil fuel has proven horrible for exacerbating the climate crisis and its disproportionate impacts. I am glad that the report encourages alternatives to methane gas hookups in new buildings in Salem, and I hope Council Members will support alternatives to this fossil fuel by approving this Plan. While studies demonstrating the harms of methane gas are abundant, and the Climate Action Report is very well researched and documented, I would be happy to provide

supplemental studies upon request.

Thank you for considering this emailed public comment. I hope you will join me in supporting Salem's Climate Action Plan!

With best wishes,

Catalina de Onis, PhD

--

catalinadeonis.com

December 6, 2021

The Honorable Chuck Bennett, Mayor
City of Salem
555 Liberty St SE, Suite 205
Salem OR 97301-3515

RE: Draft Salem Climate Action Plan

Dear Mayor Bennett and Salem City Councilors:

Energy Trust of Oregon is pleased to write and express our deep appreciation for the diligence and vision demonstrated in the Final Draft of the City of Salem's Climate Action Plan (CAP).

Energy Trust is an independent nonprofit organization dedicated to helping utility customers in Salem and communities across the state invest in, and benefit from, energy efficiency and clean, renewable power. We provide cash incentives and services to help utility customers and community leaders make improvements to save energy, generate or benefit from renewable power, and manage costs in homes, businesses and communities. We work closely with local nonprofits and community-based organizations and manage a network of skilled contractors, installers and builders.

Energy efficiency benefits everyone and Salem has a long history of demonstrated leadership in this area. Since 2002, Energy Trust has worked with and within the City of Salem to deliver on our collective clean energy objectives. Over that time, we have helped Salem residents, schools and businesses conserve and generate 1.49 billion kilowatt-hours of electricity and 26 million therms of natural gas—so far. These energy savings have also resulted in approximately \$140 million in utility bill savings for Salem-based customers of Portland General Electric and NW Natural. Importantly for the City's climate strategies, these energy and financial savings have also helped our utility partners *avoid generating 3.6 million metric tons of carbon dioxide*.

Pursuant to our grant agreement with the Oregon Public Utility Commission, Energy Trust does not advocate or lobby in support of, or opposition to, policy proposals. We offer these comments to express our interest in supporting the City should it choose to adopt the Climate Action Plan.

Energy Trust appreciates the CAP's numerous references to engaging our energy efficiency and renewable energy programs to help implement many of the strategies envisioned in the plan (Appendix 8, Strategies EN01- 37). Especially relevant is the CAP's focus on underserved and underrepresented residents. Centering these utility customers is fully aligned with Energy Trust's strategic plan goal to better serve diverse and low-income communities—a focus that will become even more important due to the recent passage of HB 3141, which for the first time directs the establishment of equity metrics to guide our work.

Additional strategies such as promoting building energy benchmarking, installing solar electricity systems and constructing Net-Zero facilities are also squarely within our purview as, per the abovementioned HB 3141, are resiliency and grid-connected electricity storage technologies.

Energy Trust appreciates City staff engaging with us to inform the plan and we look forward to continuing to work with the City of Salem to advance its clean energy policy goals.

Sincerely,

Jay Ward
Sr. Community Relations Manager

Energy Trust of Oregon
421 SW Oak St, Suite 300
Portland, Oregon 97204
www.energytrust.org

From: [Patricia Farrell](#)
To: [Amy Johnson](#)
Cc: [Robert Romanek](#)
Subject: FW: Oppose banning of Natural Gas in new construction
Date: Monday, December 6, 2021 6:46:24 AM

From: Jim Frelich <jrfrelich@aol.com>
Sent: Sunday, December 5, 2021 11:03 AM
To: SalemCAP <SalemCAP@cityofsalem.net>
Subject: Oppose banning of Natural Gas in new construction

I have lived in the Salem area for over 40 years. Banning the natural gas in new construction is not using common sense. New natural gas regulations in Salem will only hurt the housing problems that currently exist in Salem. Let's use all the tools in the tool chest and not toss out selective tools. Allow the people and market decide how to heat homes and apartments. Banning a very effective tool in new construction is in my mind is government thru negligence.

Jim R. Frelich,
Salem, OR 97305



MARION POLK
FOOD SHARE

December 3, 2021

City of Salem
555 Liberty St SE
Salem, OR 97301

To: Mayor Chuck Bennett, Councilor Virginia Stapleton, Councilor Tom Andersen, Councilor Trevor Phillips, Councilor Jackie Leung, Councilor Jose Gonzalez, Councilor Chris Hoy, Councilor Vanessa Nordyke, Councilor Jim Lewis.

Dear Mayor and Councilors,

As a member of the Climate Action Plan Task Force, I am writing in support of the Salem Climate Action Plan. In October 2020, the City Council took the important step of adopting greenhouse gas emission reduction goals, which guided the development of the strategies included in the Climate Action Plan.

Achieving the two overarching goals of the plan – reducing greenhouse gas emissions and increasing climate resilience – will require continued leadership and action from the City. Although the steps ahead are challenging, it is critical to our whole community that we continue on this path.

The risks of inaction are significant and will impact every person in our community. But as stated in the plan, “The effects of climate change will not be borne equally by Salem residents – those who contribute least to climate change will suffer the most serious consequences. Some Salemites already experience intersecting vulnerabilities due to racial discrimination, poverty, disability, housing insecurity, linguistic isolation, and barriers to nature, healthy food and economic opportunities. Climate change will exacerbate those vulnerabilities and create new ones.”

Thank you for recognizing the need to address this important issue, and for taking action.

Sincerely,

Julie Hambuchen
VP of Donor Relations

From: noreply@cityofsalem.net on behalf of philiphcarver@gmail.com
To: [CityRecorder](#)
Subject: Contact City Recorder
Date: Sunday, December 5, 2021 7:18:55 PM
Attachments: [ATT00001.bin](#)

Your Name	Philip H Carver
Your Email	philiphcarver@gmail.com
Your Phone	5035629878
Street	1007 Newport Rd. SE
City	Salem
State	OR
Zip	97306
Message	<p>Comments from 350 Salem Oregon for Dec 6 City Council meeting On information item 6.a. 21-324 Thank you for the opportunity to submit comments. I am Phil Carver, Co-coordinator for 350 Salem Oregon. 350 Salem wholeheartedly supports immediate adoption of the Final Draft Climate Action Plan. Urgency is the key message of the Action Plan. Anyone paying attention will have noticed the gathering storm. The last 16 months of climate-induced weather catastrophes have sent a message that cannot be ignored. The science is clear that large reductions in greenhouse gas (GHG) emissions are needed now. Urgent action is needed to achieve the City Council adopted reduction goals. While Salem cannot solve the climate crisis alone, cities worldwide have led the way on climate action. Cities large and small are essential players. Actions by other nations, the U.S. and many states are reducing emissions now. Many countries, including China and in Europe, are taking strong actions. Actions by the City can enhance and complement these efforts. The Action Plan is the product of 15 months of work by City staff, an excellent consultant, a 33-member community task force and multiple rounds of community engagement. It's history goes back to the adoption of the Salem Strategic Plan in 2017. Salem City staff should be praised for their excellent work. 350 Salem's involvement was key to the inclusion of the idea of developing a climate action plan in the 2017 Strategic Plan. For the Action Plan we had a representative, Prof. Janet Lorenzen, on the community task force. We have submitted numerous comments. We did not get everything we wanted in the strategies for early implementation. What is key is that every City decision going forward should be strongly influenced by all 183 strategies in the Action Plan and by the Council's GHG goals. The Council deliberations in January will be fine time for individual Councilors to highlight areas where they see a need for immediate action or to raise concerns. Still, the Council should adopt this Action Plan, as is, as soon as possible. This is not the time to debate the finer points. The special urgency comes from the need for the Action Plan to influence the proposed funding in the upcoming Bond Measure. The Infrastructure Bond Engagement Steering Committee of the Council began those discussions on Friday Dec. 3. Measures included in the Bond Measure will impact City actions for the next ten years or more. Strong actions over this period are key to meeting the Council's 2035 GHG</p>

goal. The strategies for early implementation call for walkable neighborhoods, especially those near the core transit network. They call for many more bike paths. Measures to increase the number and access to neighborhood parks are also needed. These and the other measures in the Plan will not only reduce greenhouse gas emissions, they will make Salem a more attractive and livable city. The strategies in the Plan explicitly consider co-benefits. These are advantages to the community that climate actions will cause beyond reducing emissions. The strategies in this plan take into account the following specific co-benefits: public health, environmental quality, the local economy, mobility choice and community equity. Many of the 183 strategies include 3 or more co-benefits, some include all five. Below I highlight a few of the recommended Priority Strategies for Early Implementation: EN 01: Coordinate efforts to meet citywide goals for greenhouse gas reduction using a climate justice lens so that solutions are developed in an equitable way. NR 02: Add and maintain quality parks in NE Salem. TL 03: Complete Salem's sidewalk network throughout the city, with a priority emphasis on areas within a 1/4 mile of transit route. Assess safety levels of walking routes within 1/4 mile of bus stops and improve areas of greatest needs, such as northeast Salem that have been historically and currently neglected. Reference and revise Salem's sidewalk inventory as needed. Repair existing sidewalks to increase safety and mobility, include assessment and improvement of lighting along sidewalks for safety. TL 41: Coordinate with long-range transit plans to encourage the majority of new housing and employment developments to be built in walkable, compact mixed-use neighborhoods and in areas that are well served by transit. Incentivize (e.g., through higher heights and higher minimum density requirements) in high impact areas, such as the core transit network. These and all the other strategies, including those not included in the Priority Strategies, should influence the measures selected for the upcoming Bond Measure. Thank you for the opportunity to comment.

This email was generated by the dynamic web forms contact us form on 12/5/2021.

Dec. 6, 2021

The Honorable Chuck Bennett, Mayor
Salem City Councilors
City Manager's Office
City of Salem
555 Liberty St. SE
Salem, OR 97301

Subject: Portland General Electric's comments regarding the draft Salem Climate Action Plan

Dear Mayor Bennett and City Councilors,

I am writing to provide Portland General Electric's (PGE) comments regarding the draft Salem Climate Action Plan. We appreciate the collaborative approach City staff took in asking for input and feedback as a representative on the 33-member task force over the last year.

At PGE, we work every day to provide our customers with the clean, safe, reliable, and affordable electric power they need. As an essential provider, we are focused on maintaining reliability and affordability as we build a clean energy future. We will reduce emissions from the power we serve to our customers by 80%¹ by 2030, 90% by 2035, and 100% by 2040. PGE looks forward to partnering with the City on achieving its goal of serving all residents with clean energy.

We support the City's objectives to increase electrification to reduce emissions, and we will be prepared to support this new load. Load growth from transportation and building electrification happens over years, not months, as consumers make a series of individual decisions over time. Utilities can plan for this load, just as they have for years. Fully regulated electric companies in Oregon - like PGE - are required to plan years in advance through the Integrated Resource Planning (IRP) process to inform how and when new resources are acquired to ensure that electricity can be delivered to meet customers' needs today and in the future. Through this planning process, data, policy directives, customer information, economic projections, and energy efficiency adoption rates are utilized to forecast the electricity demand over the next 20 to 30 years. This planning also accounts for increases or decreases in load forecasts due to load growth stemming from consumer behavior - such as electric vehicle adoption and building electrification. The independent oversight of the Oregon Public Utility Commission helps ensure that utilities are ready to meet loads in a constantly changing energy landscape.

There are also steps that can be taken today to improve programs and technologies that help reduce peak demand and take advantage of renewable resources when

¹ Below baseline period, defined in Oregon HB 2021 as the average annual GHG emissions for 2010, 2011 and 2012 associated with the electricity sold to retail electricity consumers as reported to the Oregon Department of Environmental Quality.



they're available. These include energy management programs that allow customers to shift their electricity use using grid-connected electric appliances - like electric water heaters and electric vehicle charges - from peak times, or to periods when there is an abundance of renewable generation. In addition, the deployment of cost-effective energy efficiency building shell measures will reduce the demand for heat and, hence, the peak impacts of operating heat pump systems.

We appreciate the opportunity to submit comments. We look forward to further discussions with City leadership and staff.

Kind regards,

A handwritten signature in black ink that reads "Wendy Veliz". The signature is written in a cursive, flowing style.

Wendy Veliz
Local Government Affairs Manager
PGE representative on Salem Climate Action Task Force





SHARON A. RUDNICK
C. ROBERT STERINGER
497 Oakway Road, Suite 380
Eugene, OR 97401
sharon.rudnick@harrang.com
bob.steringer@harrang.com
(541) 485-0220
(541) 686-6564 (FAX)

December 6, 2021

VIA EMAIL AND FIRST CLASS MAIL

Dan Atchison, City Attorney
Salem City Attorney's Office
555 Liberty St Ste 205
Salem, OR 97301

Re: City of Salem Climate Action Plan

Dear Dan:

We are writing on behalf of NW Natural Gas Company because we have significant concerns about Salem's proposed Climate Action Plan ("CAP"). NW Natural has tried to address these concerns with City staff, to no avail. We are contacting you because both the substance of the proposed CAP, as well as the process by which it is being considered, raise serious legal issues.

As to the substance of the CAP, the initial draft proposed a ban on new natural gas hookups in the City, in addition to other proposals geared toward electrification. In response, NW Natural offered comments identifying other, more effective ways to reduce carbon emissions, including more investment in renewable natural gas and hydrogen as well as energy efficiency. We also provided information and data supporting those proposals.

NW Natural also raised concerns about the City's conclusions relating to the impact any ban on new gas hookups would have on GHG emissions and asked the City to consider other impacts of a ban, such as the increased energy and equipment costs for residents and businesses, the loss of the safety and comfort of a diversified energy system, and the impacts on economic development in the City.

The revised draft of the CAP neither considered nor addressed any of these issues. Rather, the CAP continues to assert that banning new natural gas hookups is a verified way to achieve the City's carbon reduction goals, and that the City's conclusion in that regard is based on "expert opinion." When NW Natural asked for that expert analysis—or any analysis at all—to support the City's conclusions and recommendations in the CAP, it was told that there was none to show. Indeed, staff acknowledged that no full cost/benefit analysis has been prepared, and that the ratings assigned to the carbon reduction impact of the strategies outlined in the CAP "are subjective and should not be understood as definitive."

In short, it appears that the City has done no real analysis of the carbon reduction strategies proposed in the CAP, including a ban on new gas hookups. A ban on new gas hookups will have significant monetary and other impacts on Salem's citizens. At a minimum, public officials owe some fiduciary responsibility to their constituents to do the work necessary to avoid adopting such strategies unless they are well reasoned and supported by rigorous analysis. NW Natural asks that the City do the work necessary to fully analyze and understand the proposals included in the CAP to determine the most cost-effective way to decarbonize Salem's energy system before adopting or implementing the CAP.

As to the procedural issues, we understand that many comments were received, much of them unresponsive of the CAP's proposals. After the regularly scheduled closing date for public comment, the City then extended the comment period. City staff next informed NW Natural that the CAP would now be treated as a "staff report" that will be presented to the City Council as an informational item on December 6, 2021, with no public hearing conducted. Additionally, City staff shared that they are not going to be making changes to the final draft report, despite any public comments received.

This lack of public discussion around these transformative forced electrification proposals raises serious concerns. Based on the above facts and circumstances, it appears to us that the staff is revising the process to avoid exactly the type of public discourse and input that a policy decision as important as climate recovery strategies deserves. NW Natural requests that, before going further with adoption of the CAP, the City of Salem allow all stakeholders an opportunity to publicly share their views and analysis. Given the confusion about this process, we would also like clarification before the December 6th meeting as to what exactly the public process for consideration and adoption of the CAP will be, when public comment will be taken, and whether the City will address the lack of analysis and thoughtful consideration of the CAP proposals before the plan is presented to the council or otherwise adopted and implemented.

We appreciate your attention to these important matters.

Sincerely,



Sharon A. Rudnick



C. Robert Steringer

SAR:rs