

**Draft Comprehensive Climate Action Plan**  
**Summary of Public Comments Received and Recommended Actions (as of 9/4/25)**

Comment #	Last Name	First Name	Affiliation	Method	Date received	Comment proposes a change? (Y/N)	Summary of Comment and Proposed Change Identified in Comment (changes shown in <del>bold</del> and underscore)	Recommended Action in Response to Comment (changes shown in <del>bold</del> and underscore)	Change Recommended (Y/N)
1	Fiss	Adam	SW WA Regional Transportation Council	Email	8/8/2025	N	p. 13: It came as a bit of surprise to me that 'electronics manufacturing' was a leading industrial process in Clark County. The Clark County GHG inventory calls out industry as being a primary emitter, largely through refrigerants and other coolants, but doesn't call out electronics specifically.	No change recommended. Metro confirmed with the consultants that this is correct, and the apparent difference is due to the underlying differences in the scope of Clark County and the CCAP GHG inventories.	N
2	Fiss	Adam	SW WA Regional Transportation Council	Email	8/8/2025	Y	p. 15: Might be appropriate to specifically call out Clark Public Utilities in this section	Change as requested: "Other publicly- or consumer-owned utilities—such as those in the counties in the state of Washington <del>Clark and Skamania County Public Utility Districts</del> or in those the western coast range of the MSA."	Y
3	Fiss	Adam	SW WA Regional Transportation Council	Email and follow-up conversation	8/8/2025	N	p. 43: Please be consistent when referring to RTPs. Notation switches between 2023 RTP, RTP and Metro RTP. Is the 2023 RTP referring to Metro's RTP. Per our discussion, the model that underpins RTC and Metro RTPs is the same. Clark County's RTP was adopted in 2024. Recommend adding a foot note to clarify. Maybe a reference to this could also fit on page 60: related plans, projects, and resources	Change as requested. Clarify references to Metro vs. RTC RTPs throughout the CCAP and in Table 12, add a footnote to Table 12 describing the extent of coordination on the two RTPs, and add a table summarizing the scale at which all actions are applied to further clarify which actions apply to the Metro region vs. to both the Metro and RTC regions.	Y
4	Fiss	Adam	SW WA Regional Transportation Council	Email	8/8/2025	Y	p. 60: "Though not required, Metro's RTP also identifies a list of short-term constrained projects that can be implemented before the next update and a list of strategic unconstrained projects that reflect priorities for any additional funding that should become available." RTC's Clark County RTP similarly includes unfunded projects that are community priorities and couple be implemented in the 2045 horizon. Refer to page 7 onward in Appendix N: Plans, Studies, and Projects - <a href="https://rtc.wa.gov/wp-content/uploads/Programs/rtp/clark/draft/2024MTPAppendices/2024_RTP_AppN-Plans,%20Studies,%20and%20Studies.pdf">https://rtc.wa.gov/wp-content/uploads/Programs/rtp/clark/draft/2024MTPAppendices/2024_RTP_AppN-Plans,%20Studies,%20and%20Studies.pdf</a>	Change as requested. Add a reference to RTC RTP Appendix N for this action and any other actions that apply to both Metro and RTC and use the Metro RTP strategic unconstrained project list as a basis to define actions or scenarios.	Y
5	Fiss	Adam	SW WA Regional Transportation Council	Email	8/8/2025	Y	p. 61: Should clarify that it is Metro's RTP transit vision being referenced. Might also be appropriate to reference CTRAN's High Capacity Transit System Plan and Transit Development Plan or the Clark County High Capacity Transit System Study, which has analogous aims to Forward Together	Change as requested.	Y
6	Fiss	Adam	SW WA Regional Transportation Council	Email	8/8/2025	Y	p. 61: Also worth noting that RTCs Transportation Improvement Program (TIP) distributes regional allocation of Surface Transportation Block Grant (STBG), Congestion Mitigation and Air Quality (CMAQ), Transportation Alternatives (TA) programs, Carbon Reduction Program (CRP), and other regionally allocated federal funds that may support public transit.	Change as requested.	Y
7	Fiss	Adam	SW WA Regional Transportation Council	Email	8/8/2025	Y	p. 62: C-TRAN is the local public transit provider and is the designated recipient of regionally allocated federal transit funds. C-TRAN receives Federal Transit Administration (FTA) urban area funds and selects projects for Section 5307 (Urbanized Area Formula Program), Section 5310 (Enhanced Mobility of Seniors and Individuals with Disabilities), Section 5337(State of Good Repair Grant), and Section 5339 (Bus and Bus Facilities Program).	Amend to list FTA funding programs (including the 5307, 5310, 5337, and 5339 programs referenced in the comment) as potential funding sources for transit and acknowledge that transit agencies in the metropolitan area are the recipient of these funds.	Y
8	Perez Keniston	Judith	SW WA Regional Transportation Council	Email	8/8/2025	Y	p. 59, 66, 155: Replace Regional Transportation Commission with Regional Transportation Council	Change as requested.	Y
9	Perez Keniston	Judith	SW WA Regional Transportation Council	Email	8/8/2025	Y	p. 60: Document states that "Metro and RTC collaborate to ensure that their RTPs reflect each other's transit projects". In theory that is correct However, our RTP does not list or mentions Metro projects. The only commonality that we have are projects identified on I 205 and I 5. Metro's 2023 High Capacity Transit Strategy was adopted in conjunction to the RTP. This plan mentioned the light rail project on I 5 (priority 1) and a future connection bus route on I 205 (priority 4). Outside projects on the bridges Metro RTP or high capacity transit strategy do not <del>mentioned any other transit project.</del>	No change recommended. See response to comment #10, which is related.	Y

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10	Fiss	Adam	SW WA Regional Transportation Council	Email	8/8/2025	Y	p. 60 :Relating to Judith's comment, above, I would recognize that the 2045 financially constrained highway and transit network for the modeling done for each RTP contain transit and program projects found in the adopted RTP project lists. This is noted in the email from Mark Harrington dated 7/15/2025	Change as requested to clarify the relationship between Metro and RTC RTPs: "Metro and RTC collaborate to ensure that <i>the travel models that they use to analyze</i> their RTPs reflect <del>each other's planned</del> transit projects in <i>both regions.</i> "	Y
11	Perez Keniston	Judith	SW WA Regional Transportation Council	Email	8/8/2025	Y	p. 59: Recommending to delete RTC. The last part of this first paragraph under Overview states "Regional transportation plans (RTPs) for the urbanized areas of the region developed by Metro and RTC identify a variety of transportation projects that benefit the climate, advance other goals, and can be paid for with anticipated resources. " With the current administration not supporting climate actions I am not sure we want RTC's name on this statement. We need to revisit the objectives under the Sustainability and resiliency goal to ensure meet the directives of the current administration.	Change as requested.	Y
12	Perez Keniston	Judith	SW WA Regional Transportation Council	Email	8/8/2025	Y	p. 27: Comment re: GHG targets. Table 5 on page 27 accurately summarizes WA's GHG reduction targets.. However, on Wednesday County Council provided staff with a directive to include in their Climate Element the following target: Reduce GHG emission to net zero by 2050 with a base year of 2020 (not 1990 as the state has it). Vancouver GHG reduction target is: Net Zero by 2040. Somehow I think we need to note this so there is no misunderstanding of the GHG reduction goals to be adopted as part of the Comp Plan's Update.	Change as requested. Edit the text below this table as follows: "Oregon's goals were adopted by the legislature in 2007 and updated by executive order in 2020. Washington's goals were adopted by the Washington legislature in 2020. <i>Local and regional climate plans sometimes include climate goals that differ from state goals based on local needs, resources and priorities. The CCAP uses state climate goals to help define the reductions that the plan needs to achieve; it does not recommend that other climate action plans in the metropolitan area use identical goals.</i> "	Y
13	Liden	Keith	Community member	Email	8/9/2025	Y	The plan appears to assume continued state and federal funding to help implement it. Given the attitude of our current federal administration, this is probably unrealistic (I'm frankly surprised Metro's funding for this project hasn't been yanked) and should be reevaluated. To make matters worse, our state legislature becomes more dysfunctional and unreliable with each new session. ⓧ Recommendation: Include a section that discusses funding realities pertaining to implementation.	Add detail to the following text on p. 26 so that the text lists specific changes to federal programs and local resources for climate work: "It does not appear that the metropolitan area is on track to meet the 2030 target (as discussed below), and recent federal actions to scale back climate policies and programs, coupled with a lack of local resources, create a lot of short-term uncertainty for climate efforts in our metropolitan area and across the U.S." The new text will describe the current status of key state and federal processes that affect the climate actions in the CCAP, potentially including federal clean vehicle rules, federal solar credits, and state transportation funding. Available information may be limited because these processes are dynamic and ongoing.	Y
14	Liden	Keith	Community member	Email	8/9/2025	Y	The draft assumes that if active transportation services and facilities are improved, more people will walk, ride, and take transit. However, this isn't reflected in recent data. For example, TriMet's ridership was basically flat from 2005 until Covid and is now struggling to get above 60% of pre-Covid levels. Bicycling levels peaked around 2016, dropped steadily after that, and are now only seeing a feeble uptick. All the while, transit service and bicycle facilities got better! The "build it and they will come" mantra is apparently no longer valid.  Recommendation: Metro needs to sponsor a comprehensive survey to better understand what it will take to get people to not grab the car keys every time they leave home.	Add the following bullet to p. 56 as a potential transportation-related next step for Metro: "Conduct research into how and why public transit and active transportation use is changing, and recommend steps to address these changes and maximize use of these modes." This text may also include additional detail on relevant Metro projects, such as the Community Connectors Study.	Y

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15	Liden	Keith	Community member	Email	8/9/2025	Y	<p>Teleworking may be a good GHG reduction strategy, but it has been a disaster for downtown Portland and other business districts in the metro area. Downtown Portland has one of the highest vacancy rates in the country, and it's a shell of its former self. Higher telecommuting rates will only drag it down further with higher vacancy rates and plummeting real estate values.</p> <p>Recommendation: Acknowledge telecommuting, but don't encourage it.</p>	<p>Add the following bullet to p. 84 as an implementation recommendation for the Maximize Teleworking action:</p> <p>"Promote teleworking in a way that contributes to development in employment centers," including additional details about the challenges that teleworking presents for transit use and for development in some activity centers.</p>	Y
16	Liden	Keith	Community member	Email	8/9/2025	Y	<p>The plan should forget about high-speed rail and opt for reasonably fast conventional rail with better service instead. If the California high-speed rail debacle is any indication, a high-speed project here would take a century to complete. We've been working on the Columbia River Crossing for over 20 years with nothing to show for it yet. In short, we have a poor track record constructing big projects on time and on budget.</p> <p>Simply providing more frequent service and reasonably fast trains should be the goal. For example, the Portland-Seattle train has the ride quality of a stagecoach, often stops for freight traffic, and occasionally reaches around 75 mph (big deal). It takes around 4 hours for a trip that is less than 3 hours by car. Switzerland has virtually no high-speed trains, but it still offers some of the best train service in Europe.</p> <p>We could also strive to make train travel more pleasant. We've invested billions in PDX, but we can't seem to find the money to adequately maintain our train station and its disgraceful immediate neighborhood.</p> <p>Recommendation: Focus on improving service, speed, reliability, safety, and comfort of conventional intercity rail.</p>	<p>Add text to p. 90 (Related plans, projects and resources for the High-speed Rail action) acknowledging Metro's Regional Rail Futures study: "High-speed rail is focused on serving major metropolitan areas. Additional interregional passenger rail connections between smaller cities could also help to reduce driving and better connect the metro area to destinations in cases where there is adequate demand and infrastructure. Metro's Regional Rail Futures Study is currently exploring the potential to create these connections."</p>	Y
17	Liden	Keith	Community member	Email	8/9/2025	N	<p>As a recently retired planner who has worked in the metro area for many years, I have been frustrated about how the traffic engineering profession (with exceptions, of course) undercuts our planning aspirations to create livable communities that are walkable, bicycle-friendly, and transit-friendly. My experience with ODOT and Washington County in particular has demonstrated how time and again traffic engineers demand streets that will first and foremost make driving fast and convenient at the expense of active transportation modes. Bloated street cross sections and intersections, maintenance of highway speeds on streets that are transitioning from rural to urban, and infrequent and unsafe crossings on arterials and collectors continue to be required by the traffic engineers over the protest of urban planners and designers. Planning for UGB expansion areas has placed more emphasis on making them great places to drive instead of first focusing on making them great places to live. I'll spare you the examples but simply say this blind Robert Moses allegiance to the automobile will smother active transportation and create new high crash corridors into the future.</p> <p>Recommendation: Get the traffic engineering profession to support active transportation.</p>	<p>No change recommended.</p>	N
18	Jackson	Cassandra	Port of Portland	Meeting	8/18/2025	Y	<p>Acknowledge the Port's new Clean Ports plan, funded by a federal grant.</p>	<p>Change as requested. Update Appendix 1 to include a summary of this planning effort.</p>	Y

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19	Steinke	Don	Climate Action of SW Washington	Email	8/23/2025	N	<p>High-level</p> <ol style="list-style-type: none"> <li>1. Stop permitting the construction of barriers to clean energy. New construction that is not EV-ready, not solar-ready and not all-electric ready, is a financial barrier to clean energy. It is not cost effective to dig up asphalt or tear out sheet rock for electrical conduit.</li> <li>2. Stop digging deeper. Stop permitting projects (or expenditures of funds into equipment) that will increase emissions.</li> <li>3. Maximize energy efficiency everywhere.</li> <li>4. Electrify everything possible. The most palatable time to replace non-electric devices is when they age out or require a permit for repairs.</li> <li>5. Develop a workforce training program for heat-pump installations. Also develop a sustainable funding resource for heat pumps. Contractors don't want to staff-up unless they can have fairly steady work for 3 or more years.</li> </ol> <p>Misc.  Discourage the burning of woody debris or trash. We need to keep carbon sequestered as long as nature allows.</p> <p>Clean up brownfields fully so that they can be converted to mixed use development</p>	No change recommended. Comment noted. These recommendations are generally supportive of the actions related to new and existing buildings and compact communities. Metro will consider the comment re: workforce training programs for heat-pump installations as it finalizes the workforce planning analysis in the CCAP.	N
20	Steinke	Don	Climate Action of SW Washington	Email	8/23/2025	N	<p>Alt fuels</p> <p>Say No to using hydrogen for applications for which electric batteries will work. Make socially just electrolytic hydrogen to replace dirty hydrogen in fertilizer and steel manufacturing.</p> <p>Say NO to blending hydrogen into home heating fuels.</p> <p>Say NO to storage and transport of hydrogen. As the smallest molecule, hydrogen is prone to leaks and is an indirect greenhouse gas with a carbon intensity of 30.</p> <p>If we wanted to use electricity to replace all the dirty hydrogen on the market with electrolytic hydrogen, that would require all the electricity produced by the entire US electric grid, including nuclear, coal, oil, and all the renewables.</p> <p>Say no to liquid biofuels, and renewable diesel.</p>	Comment noted. The CCAP is a local and regional plan, and local and regional agencies have very little authority to require or discourage the use of specific fuels. State agencies in Oregon and Washington are responsible for administering low-carbon fuel standards and regulating the energy provided by utilities. Metro will share this comment with relevant state agencies.	N

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21	Steinke	Don	Climate Action of SW Washington	Email	8/23/2025	N	<p>Transportation</p> <p>1. Require a reduction of per-capita vehicle miles travelled in SOV. This is because even if the sale of ICE cars were to end today, existing ICE cars would continue to pollute for a long time.</p> <p>2. I urge Oregon/Metro to include an Indirect Source Review program within its State Implementation Plan as authorized under the Clean Air Act. According to the link below, local air quality districts are allowed to regulate entities, such as warehouses and airports, that attract pollution.  <a href="https://environmentalenergybrief.sidley.com/2025/04/16/states-propose-new-indirect-source-rules-targeting-warehouse-emissions/">https://environmentalenergybrief.sidley.com/2025/04/16/states-propose-new-indirect-source-rules-targeting-warehouse-emissions/</a>  In Washington, the Dept of Ecology has apparently done this in at least one case.  <a href="https://ecology.wa.gov/ecologys-work-near-you/regional-work/southwest-region/bridge-point-development-tacoma-settlement">https://ecology.wa.gov/ecologys-work-near-you/regional-work/southwest-region/bridge-point-development-tacoma-settlement</a></p> <p>3. Consider underwriting a lease program for electric trucks because regular banks won't finance a lease program for electric trucks. Banks need a record of post lease sale prices before they can underwrite leases.  We need:  1. Adequate EV charging infrastructure in new multifamily developments  2. Adequate EV charging infrastructure in existing multifamily developments  3. Adequate EV charging infrastructure in new employee parking lots,  4. Adequate EV charging infrastructure in existing employee parking lots, particularly Government property.  5. A comprehensive plan to incubate medium and heavy-duty fleets.  6. A comprehensive plan to provide charging infrastructure for medium and heavy-duty fleets.  7. Re hydrogen powered planes: For now, the highest and best use of green hydrogen is to replace dirty hydrogen in the making of fertilizer.  8. Re rail. Use wires, not liquid fuel.  9. Develop a plan to increase the reliability of public EV chargers  10. Develop a plan that will quickly lead to secure parking for bicycles.  11. Promote electric water craft.</p>	<p>Comment noted; no change recommended. Oregon's Climate Friendly and Equitable Communities rules already require local and regional transportation plans in urbanized portions of the metro area within Oregon to demonstrate a reduction in vehicle miles traveled. State building codes already require pre-wiring for EV charging infrastructure in many new developments, and state agencies in Oregon and Washington are leading work to electrify medium- and heavy-duty fleets through efforts such as Oregon DEQ's CERTA program, which funds a variety of programs to reduce medium- and heavy-duty emissions).</p> <p>With respect to local regulation of air quality and GHG emissions: Local and regional governments in the Metro area collaborate with state agencies to reduce climate pollution, especially on major commercial and industrial polluters, which have traditionally been under the regulatory authority of state environmental agencies. State agencies in both Oregon and Washington have created cap-and-invest programs (Oregon's Climate Protection Program, Washington's Climate Commitment Act) that aim to reduce GHG emissions from major polluters through a combination of regulation and incentives, in keeping with emerging best practices. Meanwhile, Portland and Multnomah County explored the potential to form a local air quality management district in 2018, and found supporting a resourced state regulatory program in conjunction with locally-led education, outreach, and incentive programs are a more effective multipronged approach to air quality issues. This suggests that the best opportunity to address GHG emissions from major commercial and industrial polluters is through existing state-led efforts. Metro will monitor the status of the Climate Protection Program and Climate Commitment Act through 2027 through the status reporting required by the grant that funds development of the CCAP.</p>	N
22	Steinke	Don	Climate Action of SW Washington	Email	8/23/2025	N	<p>Buildings</p> <p>1. Maximize efficiency  2. Encourage rooftop solar plus batteries.  3. Take lessons from the PAE Building in down town Portland.  4. Consider supporting the gas industry in transitioning to a new business model such as thermal energy networks or other ideas as suggested in this Sightline Article: <a href="https://sightline.org/2023/07/17/without-gas-what-business-models-could-gas-utilities-pursue/">https://sightline.org/2023/07/17/without-gas-what-business-models-could-gas-utilities-pursue/</a>  2. Develop a plan to help small brewers transition away from gas.  3. Recognize the huge amount of CO2 produced by burning propane in rural communities and develop a plan for them.  4. Develop a plan to help Food carts transition away from gas.  5. Develop a plan to help commercial kitchens decarbonize. Start with the excessive hot water requirements</p>	<p>Comment noted; no change recommended. Items #1 and 2 are generally supportive of the actions to reduce emissions from buildings that are already in the CCAP . The remaining comments, which get into detail about opportunities to reduce emissions from certain types of businesses or certain buildings, will be shared with the Climate Partners' Forum, which includes representatives of local governments throughout the region. These comments are best addressed through local partnerships and/or permitting authority, and opportunities to address them will vary widely and depend on factors such as the type of businesses that are located in different cities and cities' authority over commercial development.</p>	N

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23	Rattay	Scott	Community member	Email	8/24/2025	N	I am writing to express opposition to the Metro Climate Action Plan in its entirety. The plan openly admits the intent to try unpopular and controversial methods to fight climate pollution. They are unpopular and controversial for a reason. They raise the cost of living and impose mandates that restrict how we live our lives. Metro's efforts to fight climate pollution are nothing but a money and power grab. <i>Comment includes additional discussion of concerns related to the draft CCAP.</i>	No change recommended. The CCAP online open houses and other outreach conducted by Metro and agency partners demonstrates widespread support for government action on climate change. The specific concerns addressed in this comment, including cost and accountability, are addressed in the draft CCAP, which includes analyses of the costs and savings due to each action and implementation timelines and recommendations that Metro will continue to track through follow-up status reporting.	N
24	Wilson	Michael	Community member	Email	8/13/2025	N	How about some truth????? <i>The rest of the comment was a forwarded email from <a href="mailto:executivedirector@co2coalition.org">executivedirector@co2coalition.org</a>.</i>	No change recommended.	N
25	Steinke	Don	Climate Action of SW Washington	Email	8/23/2025	N	<ol style="list-style-type: none"> <li>Although EVs are not the only climate solution, EVs are essential to meeting our emissions reduction goals. Yet I saw nothing in your plan in support of EVs. A great many people in the Metro area live more than 1 mile from a transit stop. <ol style="list-style-type: none"> <li>Remove barriers to EV adoption.</li> <li>Promote EV adoption.</li> <li>Support EV charging stations in new and existing multifamily developments</li> <li>As much as possible, electrify all government vehicles.</li> </ol> </li> <li>Although land use policy reform is essential, it alone will not reduce the pollution from trucks, buses, construction equipment, garden tools, trains, planes, ships and small water craft, none of which were mentioned in your draft.</li> <li>Washington has revised It's Clean Fuel Standard (CFS). It requires fuel suppliers to reduce the carbon intensity of transportation fuels by 45% below 2017 levels by 2038. Approved by the governor on May 17, 2025, this update accelerates and strengthens the original 20% reduction target, aiming to significantly decrease transportation-related greenhouse gas emissions and promote the use of clean fuels like electricity and low-carbon fuels.</li> <li>Alternatives to Taxiing Commercial Jets. Use electric tow vehicles. For a large commercial jet, the fuel used for taxiing typically ranges from 200 to over 400 gallons, but it can vary considerably. For example, a Boeing 747 can burn about one ton of fuel, which is roughly 320 gallons, during a 15-minute taxi.</li> <li>Consider shutting down the Delta Park Speedway</li> <li>Reconsider RECs. An economist has told me that un-bundled recs do not reduce emissions. They simply acquire credits from an existing renewable energy project. I recommend actual emissions reduction within the Metro area.</li> <li>Consider requiring data centers to "Bring Your Own New Clean Energy", B.Y.O.N.C.E.</li> <li>Regarding high-speed rail. I support fast regional rail on its own track, rather than super high-speed rail between Portland and Seattle. Tens of thousands of people drive from Kelso, Longview, Kalama, Woodland, and Ridgefield every day toward the Portland area. A super hi-speed train would not stop at any of those places.</li> </ol> <p>(Comment continues, see complete comments, attached)</p>	Comment noted; no change recommended. Most of these ideas relate to federal- or state-led climate actions, and the CCAP is focused on actions that can be led by local and regional governments within the metropolitan area. As discussed in the CCAP, state agencies on Oregon and Washington administer clean fuel standards, lead actions related to vehicle electrification (particularly from heavy duty vehicles; for example Oregon's CERTA grant funds four different programs to reduce medium- and heavy-duty emissions), are currently leading on planning high-speed rail, and have the authority to regulate commercial and industrial pollution from businesses like speedways and data centers, while the Federal Aviation Administration regulates airplane fuels. In addition, the CCAP includes recommendations to ensure that RECs purchased by governments demonstrably reduce emissions. Metro will share this comment with state agencies in Oregon and Washington who generally have the authority to address the issues raised.	N

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26			Somali Empowerment Circle	Online survey	8/8/2025	Y	Somali Empowerment Circle appreciates the clarity and breadth of the draft CCAP, particularly its integration of equity considerations and the use of interactive StoryMap tools to improve accessibility. To strengthen the plan, we recommend including measurable outcomes and clear timelines for each action in the StoryMaps. We also encourage expanding engagement strategies for immigrant, refugee, low-income, and BIPOC communities to ensure those most impacted by climate change are actively involved in shaping solutions. Creating a transparent feedback loop where community members see how their input informs updates will build trust and participation. While priorities are clear, there is limited detail on how actions will be implemented. More specifics on processes, responsible parties, timelines, and resources, along with how equity will be embedded at each stage, would improve accountability and help partners like SEC align our efforts with the plan.	Change as requested. On p. 54, expand the recommendation related to collaboration to highlight the role that CBOs can play and highlight opportunities to use this collaboration not just to avoid negative impacts of certain actions, but to maximize the impact and benefits of all actions.  Revised text: "Collaborate early and broadly with a wide range of partners—including community-based organizations, businesses, residents, utilities and state agencies—to implement climate actions effectively and avoid unintended consequences. Though the actions in the CCAP are agency-led, few can be implemented by public agencies alone. Community-based organizations play a vital role in helping to reach vulnerable people who are most impacted by climate change during both planning and implementation. Businesses such as builders, utilities, and solid waste haulers, play a vital role in implementing certain actions, and often have in-depth knowledge of potential barriers and paths to implementation. For the many actions that seek to change people's behavior, residents can provide important insight on how to best engage people. Broad, up-front collaboration is particularly important for actions that risk increasing people's cost of living, such as implementing road or parking pricing and creating requirements to build more energy-efficient buildings or use lower-carbon materials. The Portland-Vancouver metropolitan area is already experiencing a housing shortage and inflation that is increasing the cost of living for everyone, and though there is broad public support for the actions in the CCAP, there is also significant concern about any actions that could further increase costs, particularly for vulnerable residents. It is especially important for agencies should work with residents, community-based organizations, and businesses who may be impacted by these actions to proactively address potential cost increases and other unintended consequences. Portland's Pricing Options for Equitable Mobility task force is an example of proactive cross-sector coordination to address the impacts of road pricing."	Y
27	Turville	Brianna	Community member	Email	8/27/2025	N	We need to protect our forests, especially old growth. We need to plan energy grid updates and changes in a way that doesn't hurt our valuable ecosystems. We need preschool for all, easier access to higher education, and easier access to child care if we're going to elevate lives like mine. We need to socialize more housing and healthcare if we want "safe, clean streets."  I also think we need more indigenous voices on ALL of our councils. Perhaps a percentage of seats should be given to leaders from our PNW tribes, leaders who can help us learn from our mistakes and live more harmoniously with Earth. Western culture has much to offer, but we can't do everything ourselves and fighting this isn't getting us anywhere but deeper into a mass grave.  (comment includes additional discussion of the need for transparency and accountability)	No change recommended. The comment recommends many steps that are supportive of the actions in the CCAP. However, none of these recommendations directly reduce GHG emissions, and the CCAP is required to focus on actions that produce demonstrable GHG reductions.	N

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29	Kay	Jenna	Clark County Community Planning	Email	9/4/2025	Y	Pg 27- We don't recommend trying to anticipate future state policy action.	No change recommended. The CCAP is required by the grant that funds it to project the GHG impact of state actions to reduce emissions.  Other commenters have noted the uncertainty involved in attempting to forecast the impact of state climate policies at this moment. See response to comment 13 for more information on how Metro intends to address this in the final CCAP.	N
30	Kay	Jenna	Clark County Community Planning	Email	9/4/2025	Y	Pg 29 -It's likely the population estimates referenced in the document from WA State are from the Office of Financial Management, not the Department of Commerce.	Change as requested, as follows:  Population growth rates come from the following sources, according to county: <ul style="list-style-type: none"> <li>• Clackamas, Columbia, Washington, and Yamhill Counties – Portland State University Population Research Center, Multnomah County – Metro.</li> <li>• Clark and Skamania Counties – Washington <del>Department of Commerce- Office of Financial Management</del> . See annual population estimates in Appendix 2.</li> </ul>	Y
31	Kay	Jenna	Clark County Community Planning	Email	9/4/2025	Y	Pg 70 -The description of RTC's role seems a bit off. RTC certifies jurisdiction's Comprehensive Plan Transportation Elements, not the entire comprehensive plan.	Change as requested, as follows:  "RTC works with its local partners to <del>ensure that local plans</del> <u>certify that the transportation elements of local comprehensive plans</u> address the GMA requirements.	Y
32	Rudolph	Mary	NW Natural	Email	9/4/2025	N	Energy Efficiency NW Natural was pleased to see that energy efficiency included as an Action Item in the Buildings Category. NW Natural is proud to support energy efficiency in both households and businesses. Our customer dollars help fund Energy Trust of Oregon's energy efficiency programs for gas equipment. Energy Trust of Oregon's energy efficiency programs fund upgrades to equipment and structures to aid in lowering energy use and costs for customers. Additionally, NW Natural, in partnership with local community action partners and community-based organizations, administers our low-income energy efficiency program for our customers. These low and no cost incentives are intended to not only reduce energy costs for these customers but also improve their affordability and reliability.	No change recommended. Comment expresses support for the CCAP actions related to energy efficiency in existing buildings.	N
33	Rudolph-Knobbe	Mary	NW Natural	Email	9/4/2025	Y	Innovation and Decarbonization NW Natural was encouraged to see language around technological advancements and innovations as a decarbonization tool but was disappointed that the focus was only on advancements in renewable electricity and lacked any consideration of innovations in the natural gas space. NW Natural is committed to working with our customers, regulators, and elected leaders to continue to drive innovative approaches to strengthening and decarbonizing our energy delivery system. Our company has led advancing decarbonization practices and pursuing lower carbon fuels. NW Natural recommends adding information about renewable natural gas and hydrogen as decarbonization tools for the natural gas system to the Comprehensive Climate Action Plan. NW Natural believes that technological advancements and new innovations will help decarbonization.	In the Collective Actions section (p. 51): edit the paragraph re: addressing natural gas emissions as follows:  "Addressing natural gas emissions: Natural gas is the largest single remaining source of projected emissions in 2050. Natural gas utilities are working to decrease the carbon intensity of their product, and these efforts are not captured in the chart above, but it would be challenging to reduce the carbon intensity of natural gas to zero. Achieving a transition away from natural gas involves a coordinated effort that could include developing <del>new cleaner- sources of natural gas</del> <u>cleaner alternatives to natural gas, such as renewable natural gas or hydrogen</u> , prioritizing these sources for the cases where natural gas is most necessary, and shifting from natural gas to electric appliances where feasible, all while ensuring that there is capacity to deliver the energy that people need without significantly increasing the cost for end users. So far it has been challenging to identify affordable low-carbon alternatives to natural gas."	N



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34	Rudolph-Knobbe	Mary	NW Natural	Email	9/4/2025	N	<p>Electrification Focus</p> <p>NW Natural is disappointed in the CCAP's focus on electrification. The Northwest Energy Efficiency Alliance's Residential Building Stock Assessment shows that 82% of multi-family housing units in the region use inefficient baseboard/wall or unit heaters as their primary heating source. NW Natural wonders why the CCAP's sole focus is on converting gas in residential and commercial buildings instead of evaluating all emission reductions options, including upgrading inefficient electric resistance homes or wood stoves, especially as these types of heating are more prevalent in homes where individuals may be more energy burdened.</p> <p>NW Natural is also concerned about the increased energy bills consumers could see due to electrification. Compared to the cost of natural gas, consumers who have electricity could see costs that are 3.5 times those of natural gas customers. Between the high cost of the new equipment and the increased monthly energy bill, fuel switching becomes financially burdensome and does not always lead to reductions in emissions.</p>	No change recommended. As described in Table 19 (p.145), electrification actions save households money. The comment cites data showing that natural gas is cheaper per unit of energy provided than electricity is, but the electrification actions in the CCAP all involve replacing conventional appliances with versions that are electric and more efficient--which means that they use less energy overall, thus lowering costs. Though electric appliances can be costly, the CCAP relies on the many available existing incentive programs to keep costs low for consumers.	N
35	Rudolph-	Mary	NW Natural	Email	9/4/2025	Y	<p>Resiliency - NW Natural is disappointed with the lack of natural gas resiliency measures discussed in the draft. Energy reliability is critical to address at the household, business, and community levels and is a foundational component of emergency preparedness, which is particularly important for our region. NW Natural's pipeline system serves as a vital asset for resilience in the region. When cold winter storms strike or high winds knock down a transmission line and electricity is lost, the gas system provides essential heating and cooking options for homes with fireplaces and gas cooktops. Many gas water heaters also function during power outages. (Comment goes on to provide additional information about the severity and impacts of power outages).</p>	No change recommended. The CCAP is required by the grant that funds it to focus on reducing climate pollution, not on adapting to the impacts of climate change.	N
36	Rudolph-	Mary	NW Natural	Email	9/4/2025	Y	<p>Resource Adequacy</p> <p>NW Natural and other regional energy providers have documented concerns about the grid's ability to handle an increase in demand. Attached to this letter is an analysis performed by the Pacific Northwest Utilities Conference Committee (PNUCC) and the Northwest Gas Association (NWGA), evaluating the resources adequacy issues the region faces. Electrification furthers the demand on the electricity grid, increasing the risk of power outages. By leveraging natural gas usage in communities it helps lessen the demand on the electricity grid, reducing the need for expensive investments into transmission and provides resiliency features during blackouts. To help create a more sustainable and resilient energy future, joint energy planning between electric and gas utilities should occur which should be called out in the CCAP as a key strategy. (comment provides more details about the impacts of power outages and the benefits of joint energy planning</p>	No change recommended. As discussed in the response to comment 35, adaptation and resilience are outside the scope of the CCAP, and as discussed in the response to comment 33, Metro defers to the states of Oregon and Washington in their oversight of the energy grid. Metro has coordinated with state agencies throughout the development of the CCAP. Metro acknowledges the increasing demands that are currently being placed on the electric grid described in the comment, but Metro has not seen any specific evidence to suggest that increasing electricity use in buildings at the scale and pace (i.e., over a 25-year time period) contemplated in the CCAP would place an unsustainable burden on the metropolitan area's energy supply.	N

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37	Houck	Mike	Urban Greenspaces Institute	Email	9/4/2025		I have read Metro's Comprehensive Climate Action Plan. While I applaud what seems to be a comprehensive approach to reducing greenhouse gases by focusing on focusing on the region's transportation system and built environment, admittedly a leading source of greenhouse gases, the word "Comprehensive" is inappropriately applied when describing a Metro's response to climate change. Metro will not have a truly "comprehensive" response to climate change until it adopts aggressive climate adaptation strategies. I recommend that Metro Council do the following to create a truly comprehensive regional response to climate change: 1). Adopt a Climate Adaptation Policy. 2). Convene a regional climate adaptation forum. 3). Utilize existing Climate Action Plans and Climate Adaptation Strategies to develop adaptation strategies. 4). Participate in the C40 Network. 5). Parks and Nature Program: Metro should review its target areas and policies regarding local share to ensure its continuing acquisition strategies are aligned with climate adaptation and nature-based solutions to climate change. (comment provides additional detail on the importance of adaptation and on the recommendations above)	No change recommended. The grant that funds the CCAP requires the use of "comprehensive" in the plan's name and requires the CCAP to focus on reducing climate pollution, not on adapting to the impacts of climate change. Other Metro projects and programs, including the Regional Transportation Plan and Parks and Nature land acquisition program, have more of a focus on adaptation and resilience. Metro will share this comment with staff who are involved in those efforts.	
38			Blueprint Foundation, Cohort 4 of Change is in the Air program	Email	9/4/2025	Y	We sincerely appreciate the vision and ambition behind the Comprehensive Climate Action Plan. Your commitment to clean energy, low-carbon transportation, and equitable, healthy communities sets a strong foundation for a sustainable future for the Portland-Vancouver region. As those who will live with the outcomes of these policies for decades, we urge you to ensure the plan includes clear, measurable indicators and a transparent framework for tracking progress. Without this, it will be difficult to know if the plan's investments are achieving real-world benefits or if adjustments are needed.	No change recommended. As discussed in the draft CCAP, many of the actions depend on further funding or other initial steps to move forward, which makes it challenging to provide specific timelines or milestones for tracking progress beyond what is already in the plan. However, Metro will consider this feedback as it continues to report on the status of the actions in the CCAP through 2027, with a focus on creating transparency and accountability for the many different organizations involved in implementing these actions.	
39			Blueprint Foundation, Cohort 4 of Change is in the Air program	Email	9/5/2025	Y	This need is especially urgent for air quality, a critical issue for many impacted communities. The plan currently lacks a defined strategy to integrate community-led, non-regulatory air monitoring—a proven approach that empowers residents, informs emergency response, supports public health, and provides credible data to evaluate success. Embedding community-driven monitoring into the CCAP will enhance accountability and help ensure environmental and equity goals are met.	No change recommended. The scope of the CCAP is limited to actions that reduce greenhouse gas emissions. Metro acknowledges that monitoring air quality can support the outcomes described in the comment, but monitoring does not reduce GHG emissions, nor does it help to track levels of GHG emissions, which are a global pollutant that is best tracked through methods other than local monitoring.	
40			Blueprint Foundation, Cohort 4 of Change is in the Air program	Email	9/6/2025	Y	We also encourage stronger support for youth-led invention and innovation. While continuing existing initiatives is important, investing in youth education and hands-on projects focused on energy innovation and carbon capture can spark new solutions and foster meaningful engagement. Programs like The Blueprint Foundation's Change is in the Air have already demonstrated success in training community scientists, deploying air monitors, and engaging the public. We are ready to partner with Metro to expand these efforts and help meet regional needs.	Metro will consider this comment as it finalizes the Workforce Planning Analysis in the CCAP and may make changes as a result. The Workforce Planning Analysis will identify the job sectors that are critical to implementing the CCAP, identify any shortages in these sectors that may pose barriers to implementing the plan, and identify programs and interventions that can help to address these shortages.	