



**March 24, 2024**

**To:** Mayor Wheeler and Portland City Commission

**CC:** Relevant City Staff

**Subj:** Support for Multifamily Energy Reporting and Tenant Disclosure Policy & Electrification Efforts Broadly

Mayor Wheeler and Portland City Commissioners,

The undersigned organizations are writing to express our strong support for the draft Multifamily Energy Reporting and Tenant Disclosure Policy, and more broadly for policies to reach Portland's 2050 goal of zero-emission buildings. There is a growing body of literature which clearly shows the significant health and climate impacts of using fossil fuels in homes and buildings, and the overwhelming benefits of making the transition to high-efficiency electric alternatives. It is critical for the City to quickly move forward with a suite of policies, including the Multifamily Energy Reporting and Tenant Disclosure Policy, to support the equitable electrification of homes and buildings while mitigating health impacts and reducing energy burden for the most vulnerable members of the community.

Specifically, we strongly support the draft policy, as it will provide key information regarding the energy use of large multi-family buildings in the City, which, combined with existing reporting requirements for large commercial buildings, will provide a comprehensive and useful set of data on the climate impacts of the City's largest buildings. Collecting this data is the first step to creating a plan to rapidly and equitably reduce emissions associated with Portland's building stock, and to transition these buildings to clean, renewable electricity. Additionally, the reporting requirements included in the policy will give prospective tenants in Portland important information regarding energy use and utility bills which will in turn help to protect vulnerable communities from high energy burden and incentivize landlords to install high efficiency appliances. The reporting requirements will also give prospective tenants critical disclosures about the health impacts of burning gas in homes, and allow renters to make informed decisions about their health when considering homes and apartments.

Multnomah County's 2022 report, *A Review of the Evidence: Public Health and Gas Stoves (Report)*, made clear that appliances that burn methane gas pose a direct threat to the health of Oregonians and to our climate.<sup>1</sup> Specifically, the *Report* documented the deleterious effects on

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<sup>1</sup>Multnomah County, "[A Review of the Evidence: Public Health and Gas Stoves](#)", November 2022

health of nitrogen oxide (NOx) emissions associated with the combustion of gas. Exposure to NOx associated with gas stoves has been shown to increase the risk of children experiencing asthma symptoms by 42% and the risk of being diagnosed with asthma over their lifetime by 24%.<sup>2</sup> Since the publication of Multnomah County's *Report*, a peer-reviewed study found that almost 13% of all childhood asthma cases in the United States are associated with exposure to gas stoves.<sup>3 4</sup>

In addition to the significant impacts to indoor air, data from the US Environmental Protection Agency shows that the use of gas in homes and buildings is a significant source of outdoor NOx pollution, generating nearly 1,000 tons of NOx pollution annually.<sup>5</sup> The county has the largest NOx pollution of any county in the state, 35% higher than the next highest county.<sup>6</sup> In Multnomah County, gas-fueled building equipment generates three-fourths as much NOx pollution as comes from gas power plants across the entire state.<sup>7</sup> [One in 10](#) adults in Multnomah County report an asthma diagnosis, making the disease among the most prevalent chronic illnesses in the county. Because exposure to NOx, ozone, and PM2.5 can trigger and exacerbate asthma attacks, reducing NOx emissions from homes and buildings should be a priority for the City of Portland. The health burden associated with this pollution is not borne equally, as asthma rates are higher in low-income communities and communities of color, who are more likely to live in places where outdoor air is more polluted.<sup>8</sup>

Beyond just increasing awareness about the very real threats to public health, this policy is a strong step toward the City's goals of a 50% reduction of emissions (compared to 1990 levels) by 2030, and 100% by 2050.<sup>9</sup> According to the most recent published data, residential and commercial buildings make up 38% of greenhouse gas emissions in Multnomah County, making them the second largest source of emissions in the County.<sup>10</sup> At the state level, fossil fuel equipment in Oregon homes and businesses releases as much climate pollution as 1.1 million passenger cars, more than are [registered](#) in Multnomah and Washington Counties combined.<sup>11</sup> <sup>12</sup> Transitioning to our increasingly clean electrical grid can dramatically reduce climate emissions, while providing many co-benefits to Portland residents.<sup>13</sup>

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<sup>2</sup> Weiwei Lin, Bert Brunekreef, Ulrike Gehring, "[Meta-analysis of the effects of indoor nitrogen dioxide and gas cooking on asthma and wheeze in children.](#)" International Journal of Epidemiology, Volume 42, Issue 6, December 2013, Pages 1724–1737,

<sup>3</sup> Gruenwald, T.; Seals, B.A.; Knibbs, L.D.; Hosgood, H.D., III "[Population Attributable Fraction of Gas Stoves and Childhood Asthma in the United States.](#)" *Int. J. Environ. Res. Public Health* **2023**, *20*, 75.

<sup>4</sup> Maxine Joselow, [Gas stove pollution causes 12.7% of childhood asthma, study finds](#), Washington Post, 2023

<sup>5</sup> U.S. Environmental Protection Agency (EPA), [2020 National Emissions Inventory](#), March 2023. Appliance emission estimates include residential & commercial emissions for the gas, oil, & other fuel categories, with commercial emissions adjusted to exclude certain non-appliance sources like pipeline compressor stations.

<sup>6</sup> EPA, [2020 National Emissions Inventory](#). See note 5.

<sup>7</sup> EPA, [2020 National Emissions Inventory](#). See note 5.

<sup>8</sup> National Academy of Medicine (formerly Institute of Medicine) Committee on Environmental Justice, [Toward Environmental Justice: Research, Education, and Health Policy Needs](#), 1999.

<sup>9</sup> City of Portland, "[About the Climate Emergency Declaration](#)"

<sup>10</sup> City of Portland, "[Summary of 2021 Multnomah County Carbon Emissions and Trends](#)", July 2023

<sup>11</sup> EIA, "[Energy-Related CO2 Emission Data Tables – Sectoral specific emission tables by state](#)," July 2023.

<sup>12</sup> EPA, "[Greenhouse Gas Equivalencies Calculator](#)," 2024.

<sup>13</sup> RMI, "[All Electric Buildings: Key to Achieving Oregon's Climate Goals](#)," July 2023

In light of this information, the undersigned organizations strongly support the Portland City Council to move forward with the Multifamily Energy Reporting and Tenant Disclosure Policy, and more broadly, to develop policies to electrify homes and buildings across the city in order to protect our public health, our pocketbooks and our climate.

Thank you for your consideration.

Signed,

Brian Stewart, Co-Founder, Electrify Now

Meredith Connolly, Oregon Director, Climate Solutions

Karen Harrington, Legislative Committee Chair, Climate Reality Project, Portland Chapter

Lindsey Scholten, Executive Director, Oregon League of Conservation Voters

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