City of Portland

Office of the
City Administrator
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Office of the City Administrator
Raymond C. Lee III, City Administrator

Memo: Response to Climate Justice Audit

Date: February 17, 2026
From: Raymond C. Lee III
To: City Auditor Simone Rede

This letter provides a written response to the recommendations from the audit "Climate Justice: Clear direction, strategies, and transparency needed to follow through on the City's climate commitments".

The City Administrator greatly appreciates the work of the Auditor's office in assessing the City of Portland's role in taking action to reduce planet-warming emissions and to help communities become more resilience to climate impacts, as well as the collaboration and partnership throughout the audit process.

As the audit findings rightfully highlight, climate work has been elevated in Portland's new form of government, providing an opportunity to align bureaus, policies and resources in support of climate priorities. With the Chief Sustainability Officer position in the City Administrator's Office and creation of the Sustainability and Climate Commission, we are positioned to provide the accountability and coordination mechanisms that the audit recommends.

Looking forward, it is clear that Portland faces interconnected crises that demand coordinated action, and Portlanders today and future generations are counting on us to act. As the new City Administrator, I am clear in my support for the city's climate goals, our commitment to environmental justice, our focus on building community resilience and the need to meet these and future goals within the financial constraints and realities we face. We agree with the recommendations provided in this audit and look forward to continuing this vital work on behalf of and alongside Portlanders in the years to come; however, without additional resources, this work risks being largely symbolic.

I appreciate your recognition of the ongoing funding challenges, and look forward to the work to come implementing your recommendations, in partnership with City Council, and with leadership from Chief Sustainability Officer Vivian Satterfield and teams across the city.

Below is our detailed response to the audit recommendation.

Recommendation 1

The City Administrator or a designee should provide centralized leadership and direction to help ensure the climate action plan is implemented. The City Administrator or a designee should also help define structures and mechanisms for effective coordination across the City to implement the plan.

Response for Recommendation 1

Agree

Target date to complete implementation activities: March 2028, with implementation of an iterative and collaborative process beginning immediately.

Narrative for Recommendation 1

Chief Sustainability Officer (CSO) will work with the City Administrator and Deputy City Administrators to improve accountability to the service areas to be responsive to the Climate Action Plan by:

- Collecting climate data to a defined 'minimum standard' to bring a certain minimum standard of project information, quality, and grounding in climate science
- Working with the City Performance Office to support metrics development and standards for reporting
- Designating climate leads within each service area to coordinate between CSO, citywide Climate Practitioners, Sustainability and Climate Commission, and service area leadership to create, implement, and report on work plans to implement the next Climate Action Plan
- Developing accountability and authority structures defining how all bureaus, service areas, and offices report progress, escalate challenges, and receive direction from CSO
- Clarifying CSO authority and assess staffing needs to provide strategic direction, coordinate climate-related budget requests and work plans, track implementation, and facilitate cross-bureau coordination

The City Administrator will support the CSO through regular climate updates to City Leadership Team and integration of strategic resources and staff allocation. Given that service area structures are relatively new, we commit to regularly reviewing effectiveness of coordination mechanisms and adjusting as needed.

Recommendation 2

The City Administrator, in conjunction with the Mayor and other City leadership, should factor in climate cost considerations, especially related to delayed action with respect to life and safety risks, as well as financial costs, during the budget process.

Response for Recommendation 2

Agree

Target date to complete implementation activities: Full integration by FY 2028-2029 budget process, with research, planning, and implementation beginning immediately.

Narrative for Recommendation 2

CSO will recommend the Sustainability and Climate Commission consider the merits and implementation of a climate budget as part of the next Climate Action Plan. PCEF will also be developing the next Climate Investment Plan (CIP) in 2027, presenting an opportunity to align those investments with a climate budget.

Proper climate budgeting aligns climate action and city budgets with adopted climate goals. This requires cross-organizational alignment with the climate action plan, PCEF's CIP, and the city budget office to ensure funding allocations support identified reductions. The city budget processes need to be amended to integrate the climate budget and create a process to approve investments based on alignment with the climate budget. Following C40's Climate Budgeting Framework, this approach:

- Embeds climate considerations into annual budget cycles rather than treating climate as a separate process
- Creates cross-organizational alignment between the Climate Action Plan, PCEF's CIP, and city budget office
- Enables tracking and reporting on climate measures alongside financial expenditures
- Provides transparent information on what funding is needed to meet climate goals and costs of delayed action

The CSO will work with City leadership and relevant staff to:

- Coordinate CAP development timeline with PCEF CIP planning (2027) to establish aligned climate priorities and fund strategies.
- Leverage C40 Cities' Climate Budgeting Framework, step-by-step guide, and learning from pilot cities to adapt climate budgeting to Portland's governance structure.
- Identify additional steps within existing city processes to integrate climate budgeting. Typically, the cities that use climate budgeting will adopt a multi-year climate plan, climate investment plan, and climate budget plan that cover 3-5 years.
- Provide training for finance staff, climate analysts, and bureau implementation staff.
- Amend city budget processes to integrate climate budgeting, including budget instructions, decision frameworks for evaluating requests that weigh climate benefits and trade-offs, cost of inaction, and lifecycle cost analysis for capital investments.

Phase implementation: research and planning (FY 2026-27), pilot and PCEF CIP coordination (FY 2027-28), full citywide integration (FY 2028-29).

The City Administrator acknowledges that Portland faces historic budget shortfalls and ongoing financial constraints. Climate budgeting will provide transparency about what is needed to meet climate goals, cost of inaction, and how limited resources can be most effectively allocated.

Recommendation 3

The Chief Sustainability Officer should work with the Sustainability and Climate Commission to ensure the new climate action plan includes goals and strategies to address climate adaptation in a way that is

integrated with work focused on climate mitigation. The results of the Climate Change Risk Assessment and community engagement should help inform this work.

Response for Recommendation 3

Agree

Target date to complete implementation activities: March 2028, with the Climate Change Risk Assessment completion in October 2026 and ongoing Climate Action Plan development process from February 2026.

Narrative for Recommendation 3

The next CAP will integrate climate mitigation and adaptation goals and strategies are essential for effective climate action through evidence-based adaptation planning and community engagement. CSO will ensure the Climate Change Risk Assessment (CCRA) findings and community engagement via the Sustainability and Climate Commission (Commission) directly inform CAP goals and strategies by working with City leadership and subject matter experts to:

- Use the CCRA to identify Portland's most significant climate risks and which communities and assets are most vulnerable
- Develop adaptation strategies based on CCRA analyses, including establishing specific, measurable adaptation goals for key climate risks
- Create an integration framework showing how mitigation and adaptation interact and examine co-benefits and tradeoffs of climate impact (*i.e.,* emissions reduction, adaptation benefits, and contribution to multiple goals)
- Lead community engagement through the Commission to ensure strategies reflect community priorities
- Work with the City Performance Office to develop metrics, baseline data, and reporting structures for outcomes

The City Administrator will support the CSO, alongside City leadership, to ensure the proper subject matter experts embedded in their service areas and bureaus have capacity to contribute to this work.

Recommendation 4

The Chief Sustainability Officer should work with the Sustainability and Climate Commission to develop a prioritization framework that ensures the next climate action plan is transparent about how actions in the plan were chosen and prioritized, while continuing to monitor progress on the Climate Emergency Workplan until the new plan is in place. The new plan should:

a) Provide sufficient detail to facilitate bureau actions and coordination.

b) Transparently communicate the multiple criteria used to enable identifying actions that advance several goals at once, or that may benefit one goal while creating tradeoffs for another.

Response for Recommendation 4

Agree

Target date to complete implementation activities: March 2028 for next Climate Action Plan completion, with ongoing Climate Action Plan development process and Climate Emergency Workplan monitoring.

Narrative for Recommendation 4

CSO and the Sustainability and Climate Commission will continue to monitor progress and evaluate the Climate Emergency Workplan by bringing:

- Regular updates and ongoing work from service areas and bureaus and their subject matter experts to the Commission
- Short-term climate priority recommendations to the Mayor, City Administrator, and City Council, alongside the next CAP development process
- Evaluation of the Climate Emergency Workplan ongoing work to City leadership

CSO and the Sustainability and Climate Commission will develop a multi-criteria prioritization framework for the next CAP that evaluates potential actions and facilitates decision making based on:

- Climate impact, including emissions reduction potential, adaptation benefits, and co-benefits that contribute to multiple goals
- Equity and justice, including benefits for frontline communities, reduction of disparities, and centering community priorities and lived experiences
- Feasibility and implementation, including City authority and capacity, costs and resources, and realistic timelines
- Co-benefits and tradeoffs related to other City priorities, including economic development, public safety, infrastructure resilience, and potential conflicts

The framework will include clear methodology for evaluation, weighting, community input, and equity centering. The CAP development process will transparently document the prioritization process and explain how actions were selected.

CSO will ensure next CAP is clearly actionable by providing sufficient detail and funding mechanisms to facilitate bureau actions, coordination, and implementation by including:

- Feasible timeframes with start and end dates, milestones, and interdependencies on related work
- Costs and resources requirements, such as estimated full implementation costs, staffing needs, capital and operating costs, potential funding sources, and identified gaps
- Clear responsibilities and roles, lead and supporting bureaus, external partners, and coordination requirements
- Input from the City Performance Office to measure specific outcomes, baseline data and targets, and reporting requirements

- Implementation plans that include key activities, coordination mechanisms, risk mitigation, community engagement, and equity considerations

The City Administrator and City leadership will work with CSO to set clear authority lines, create realistic timelines based on organizational capacity, specify coordination for cross-bureau action, and develop pragmatic funding strategies to commit to actions. The next CAP will be designed from the start as an implementation tool and based in the multi-criteria prioritization framework.

Recommendation 5

The Chief Engagement Officer and the Chief Sustainability Officer should work with the Sustainability and Climate Commission to develop a community engagement strategy that enables community engagement, especially among frontline communities, at all stages of climate action work. The strategy should:

a) Consider whether community groups receive adequate resources for their involvement

b) Integrate work the community has already been involved in

Response for Recommendation 5

Agree

Target date to complete implementation activities: Ongoing

Narrative for Recommendation 5

The Chief Engagement Officer and CSO will work with the Sustainability and Climate Commission to develop a community engagement strategy addressing:

- Engagement principles: center frontline communities and those most burdened by climate impacts, provide clear information about purpose and decision-making roles, build existing relationships, respect community expertise, use multiple modalities, and maintain sustained engagement
- Engagement through all phases: planning, decision-making, implementation, monitoring, and revision
- Fair compensation: evaluate current practices, research best practices, develop recommendations for compensation, and establish accessible processes with procurement
- Integration of existing input and resources: synthesize community input from Council's 2020 Emergency Declaration, Climate Emergency Workplan, charter reform Climate and Environmental Justice listening sessions, bureau-specific engagement, PCEF engagement, and Sustainability and Climate Commission design workshops
- Engagement gaps and needs: identify what prior community engagement has not been adequately acted on, prioritize repeated engagement results, focus new engagement where community priorities are unclear, and use existing pathways to reduce community burn out
- Communication plan: set clear expectations about how community input will be used and who makes final decisions, and feedback loops showing how input influenced decisions.

- Leverage City partnerships and their engagement results: Multnomah County, including the Climate Justice Plan and Climate and Health Vulnerability Assessments, and climate nonprofit and organizations that collect and maintain community data

The City Administrator and City leadership will work with CSO and Chief Engagement Officer to ensure proper engagement, communication, equity, and subject matter expert staff are contributing to this work in alignment with newly established Citywide strategies, clearly identify resource needs and constraints.

Please contact Chief Sustainability Officer Vivian Satterfield at vivian.satterfield@portlandoregon.gov or 503-314-6790 with any questions.

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