Climate Justice: Clear direction, strategies, and transparency needed to follow through on the City's climate commitments

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Summary

City governments have an important role in addressing climate change. Cities can take actions to reduce planet-warming emissions and help communities become more resilient to climate impacts, such as implementing clean electricity law and expanding tree planting.

The City of Portland uses a climate justice approach to address that climate change impacts the most vulnerable communities first and hardest. Since the transition to a new form of government in 2024, the City took steps to elevate climate work. However, work still remains to make climate actions more effective.

This audit examined how the City prioritized and coordinated its climate work. We found that centralized authority and defined coordination structures would help the City follow through on its climate commitments. Additionally, a realistic funding plan could help overcome the challenge of addressing competing priorities. These internal changes would provide clearer direction to bureaus and help to better prioritize and coordinate climate work.

This audit also examined whether the City considered the impacts of climate change on the community and how the City integrated community involvement into its climate work.

- We found that developing **a climate adaptation strategy** would help the City to more effectively address community impacts, especially for the Portlanders most vulnerable to the impacts of climate change.
- We found that **increased transparency** could help build trust with external partners and help ensure climate actions are implemented.
- We also found that guidance from **a community engagement strategy** could help achieve climate goals.

We recommend that City leadership provide clearer direction to ensure the City follows through on its climate commitments. We also recommend that City leadership work in collaboration with the Sustainability and Climate Commission to more effectively address community climate impacts and build trust with external groups.

Background

Cities have an important role in addressing climate change

Climate change is a serious threat. Portlanders already experience the effects through record-breaking heat, smoke from wildfires, floods, and other extreme weather.

Scientists also warn that the speed and scale of climate change is in uncharted territory, with key climate indicators worsening faster than in the past and increasing risks to people and the environment.

City governments can help address climate risks. Cities can make climate policies, provide market incentives to companies that reduce planet-warming emissions, and lead by example by internally reducing emissions. Cities can also support the work of other groups, including members of the community. Support includes education, outreach, technical assistance, and engaging with underserved communities. City governments can take some actions, but other climate work requires actions from community members, businesses, and other partners. Individual decisions and behaviors from businesses and community members add up to address climate risks. For example, businesses deciding to upgrade the lighting system in a commercial building, or community members deciding to take the bus over driving. The success of climate actions ultimately depends on collaboration between city governments and external partners.

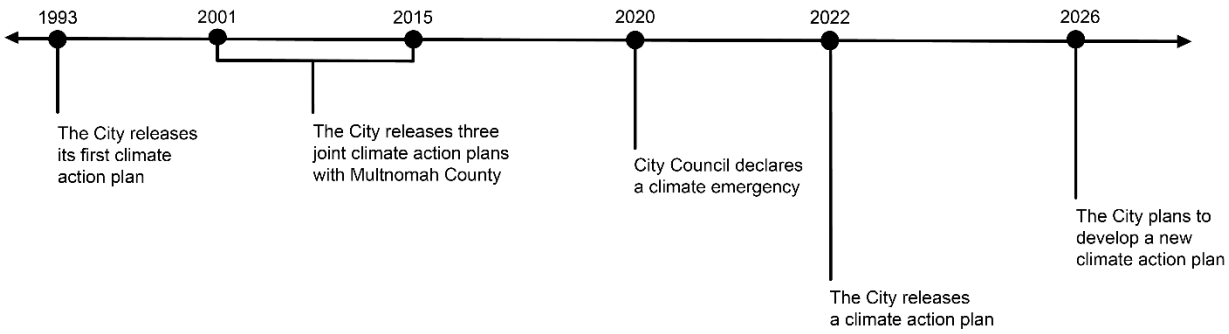
The City has made commitments to climate justice

Climate justice is an approach that recognizes that everyone faces impacts from climate change, but some communities are impacted first and hardest. The communities most at risk from climate change are known as frontline communities. The City defines frontline communities as including Black, Indigenous, and People of Color, immigrants, refugees, low-income individuals, labor and workers, people with disabilities, youth, and people experiencing homelessness.

The City has a history of making commitments to climate work and climate justice. The City of Portland compiles its planned climate work into climate action plans. Portland was the first city in the United States to adopt a climate action plan in 1993. Since then, the City has updated its climate action plans several times. The City and Multnomah County released joint climate action plans in 2001, 2009, and 2015. These plans started to include a climate justice approach in 2015. The 2015 Plan did not use the term climate justice, but the concepts of climate justice are reflected through the plan incorporating equity to address different communities experiencing climate effects differently.

The City’s most recent climate action plan includes a specific focus on climate justice and will be developed starting in 2026. In 2020, Portland City Council declared a climate emergency and directed the City to use a climate justice approach. The 2022 Plan was created to respond to Council’s climate emergency declaration and includes a focus on frontline communities. It expired in 2025. The final progress report was released in August 2025. The City will start developing a new plan in 2026.

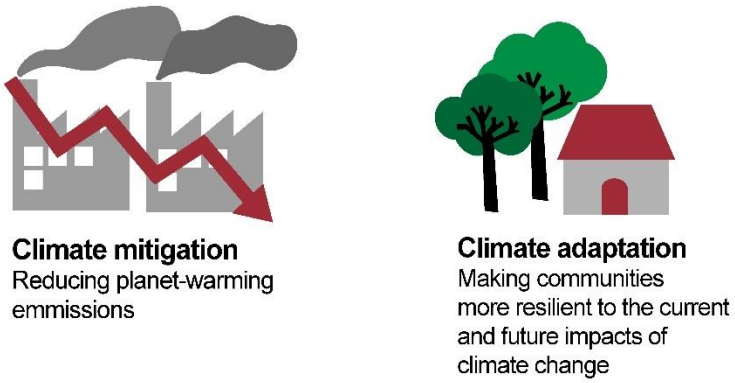
Figure 1. The City has updated its climate action plans several times and will start developing a new plan in 2026



Source: Audit Services' visualization of milestones and key climate documents from 1993-2025

Actions in the City's climate action plans fall under two categories: climate mitigation and climate adaptation. Individual or collaborating bureaus are responsible for completing these actions.

Figure 2. Climate mitigation focuses on reducing planet-warming emissions, while climate adaptation focuses on making communities more resilient.



Source: Audit Services' analysis of the 2022 Climate Emergency Workplan

Climate mitigation means reducing planet-warming emissions from the built environment, vehicles, and industry. For example, the Bureau of Planning and Sustainability is responsible for implementing Oregon's 100 percent clean electricity law. Completing this action would mean that Portland's electricity comes from renewable sources that do not release planet-warming emissions.

Climate adaptation means making communities more resilient to current and future impacts of climate change. For example, Portland Parks & Recreation, the Bureau of Environmental Services, and Planning and Sustainability are responsible for expanding tree planting in East Portland and other priority spaces. Completing this action would expand the environmental, public health and livability benefits of urban trees to areas that are more exposed to hazards than other parts of Portland.

The City has elevated climate work in its new form of government

The City took several steps to elevate climate work during its transition to a new form of government in 2025.

The City changed its Charter to give the Mayor and City Administrator climate responsibilities. Both the Mayor and City Administrator are now responsible for advancing efforts to mitigate the human-made climate crisis and prioritize environmental justice initiatives.

The Chief Sustainability Officer position was also elevated. The position was originally in Planning and Sustainability and has moved to the City Administrator's Office.

Council also approved the creation of the Sustainability and Climate Commission. The Commission is a dedicated, 20-person body who champions for climate action in the City and reports to the Chief Sustainability Officer. It is made up of community climate experts and community members with lived experience. The Commission will develop the City's next climate action plan and is described by the City as having a role in advancing climate justice.

Results

Centralized authority and defined coordination structures could help the City follow through on climate commitments

City leadership did not effectively authorize a mechanism to hold bureaus accountable for climate work. Effective climate action planning relies on city leadership to authorize, resource, and deliver on climate actions. Planning and Sustainability led the development of the 2022 Plan, but managers and staff from multiple bureaus told us that it did not have the authority to enforce bureaus to act. Planning and Sustainability's authority was also limited because it was not positioned centrally within the City.

The City has made some improvements to centralize authority, but challenges remain. The Chief Sustainability Officer is now positioned centrally in the City Administrator's Office. The Chief Sustainability Officer has authority over the Sustainability and Climate Commission, which will create the new climate action plan. While the Chief Sustainability Officer is positioned more centrally, the Officer does not have a direct link to the bureaus that will implement the plan because bureaus report to the City Administrator through a deputy city administrator rather than directly to the Officer. Managers and staff from the Sustainability Office and other bureaus told us that the Chief Sustainability Officer still does not have the authority to ensure bureaus are accountable for the climate action plan.

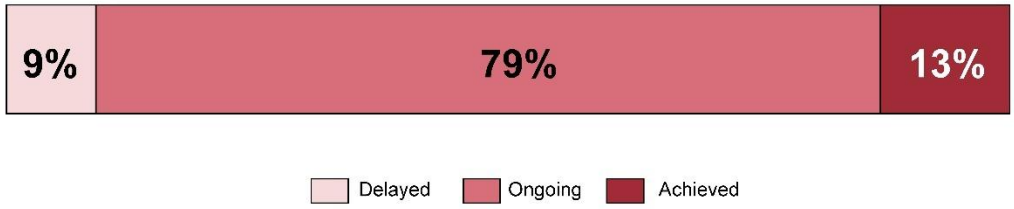
Figure 3. The Chief Sustainability Officer is positioned centrally within the City but does not have a direct link to bureaus

Source: Audit Services' analysis of August 2025 City organization chart

Bureau accountability for climate implementation is a challenge because bureaus are responsible for implementing climate actions but have competing priorities with other core responsibilities. Managers and staff from multiple bureaus told us that climate work adds costs, which makes climate action prioritization difficult when bureaus are facing budget constraints. Clear direction from City leadership on how bureaus should prioritize climate work could help address the challenge of competing priorities.

Clear direction from City leadership could also help to advance progress on ongoing climate work and areas the City has identified as needing attention. By the final progress report, 79 percent of the 2022 Plan's climate actions were ongoing and 9 percent of actions were delayed. The progress report stated that many actions described important ongoing work that predated the 2022 Plan and will continue beyond it. Management told us that these actions are ongoing because they require complex resources and capacity. Staff also identified two areas in the progress report as having progress but needing to accelerate. These areas include actions and investments that make City infrastructure and operations more climate-resilient, as well as policy change and leadership. Best practices say that climate action planning needs vigorous leadership to succeed and focus from City leadership may be needed in these areas.

Figure 4. Most of the 2022 Plan's 47 actions remain ongoing



Source: Audit Services' analysis of the final progress report for the 2022 Climate Emergency Workplan

The 2022 Plan does not clearly define an organizational structure for bureaus to coordinate climate work. Effective coordination is especially important because more than half of the actions in the 2022 Plan involved more than one bureau. To maximize efficiency and effectiveness, organizations should make sure structures align with the intended goal. Without a defined structure for coordination, it is difficult to ensure that cross-bureau climate actions are carried out efficiently. Managers and staff from multiple bureaus described challenges in coordinating climate work, including navigating siloes across bureaus.

Staff and managers from multiple bureaus told us that past climate work depended on committed individuals doing their best and relying on the relationships they've built as a substitute for a more defined coordination structure. For example, staff created a volunteer group of climate practitioners from different bureaus to coordinate work for the 2022 Plan.

The City's transition to a new form of government presents an opportunity to formalize organizational structures for coordinating climate work. For example, the Sustainability Office has done some work to restructure the volunteer group of climate practitioners to align with the Office and the Sustainability and Climate Commission. Further centralizing authority and defining structures for coordinating climate work would help the City improve accountability and implement climate commitments more consistently. Doing so can deliver benefits for everyone, especially the frontline communities most impacted by climate risks.

A realistic funding plan could help the City prioritize its climate work

Ongoing financial constraints make it challenging for the City to fund its climate work. The 2022 Plan identified individual actions with a staffing or funding gap exceeding $500,000. These actions represent around a quarter of all actions, and for most, the gaps were substantially higher. Additionally, the City faced a historic budget shortfall of $93 million in the general fund and $65 million beyond the general fund for Fiscal Year 2025-26 and expects financial challenges to continue. In 2025, the federal government also froze or cancelled several significant grants funding the City's climate work. As a result, funding climate work may be difficult because the City must balance limited resources across many competing priorities.

The Portland Clean Energy Fund (PCEF) can fund some bureau climate work if that work matches the criteria of the program. PCEF is designed to invest in community-led projects that reduce carbon emissions, create economic opportunity, and help make Portland more resilient to a changing climate. Bureaus completing climate related projects will receive $387 million in PCEF funding over five years starting from 2024. Almost a quarter of the 2022 Plan actions received PCEF funding. However, community members have expressed concern about the City's use of PCEF. Some public testimony supported City projects, especially those focused on active transportation and tree care. But, some public testimony opposed allocating significant resources to bureaus and advocated for greater funding for community-led projects through PCEF's Community Grants program. Some community and business groups also told us that the City has not been transparent enough about how PCEF funding is used when allocated to bureaus.

Although focusing on climate action while making budget decisions is one of the City's stated values, climate work is not fully integrated into the City's budget process. Staff and managers from multiple bureaus told us that they would like the City to have a more systematic approach to budgeting to make sure climate work happens. The Sustainability Office is exploring climate budgeting, a best practice from C40 Cities, a global network of cities addressing climate change. Climate budgeting would embed climate targets and considerations into the City's decision-making as part of the existing budget process. This practice could help to ensure there is a realistic funding plan for climate work.

While the City may currently face significant funding challenges, it also made a commitment to respond to the climate emergency by initiating greater action and resources. Managers and staff and community groups also told us that dedicated resources are an important part of prioritizing climate work. Actions that are not funded may not happen and may never deliver their intended benefits.

A rapidly changing climate poses both health and financial risks to the City and the community. Around a quarter of the actions in the 2022 Plan have co-benefits for improving public health in addition to climate benefits. The City not completing actions that have intended climate and public health benefits impacts everyone. The effects are even greater for the frontline communities hit first and hardest by the impacts of climate change.

Developing a climate adaptation strategy could help the City more effectively address community impacts, especially on the most vulnerable

The 2022 Plan does not have specific goals for climate adaptation. Climate planning experts recommend that city governments should identify adaptation goals for each of the key climate risks that a city faces. For example, a goal related to the risk of increasing heat may be that community members will be healthy and productive and infrastructure will be resilient, during periods of extreme heat. The 2022 Plan includes a priority to build Portlanders' resilience to the impacts of climate change with a focus on the most vulnerable. However, this is not a specific goal staff can use to measure progress and does not address Portland's specific climate risks.

By contrast, the 2022 Plan specified goals for climate mitigation. The City aims to reduce Portland's planet-warming emissions by 50 percent from 1990 levels by 2030, Additionally, the City has a goal of reaching net-zero planet-warming emissions by 2050.

The City conducts climate adaptation work, like expanding tree planting, but a defined strategy could help improve effectiveness. Around half of actions in the 2022 Plan are focused on climate adaptation. Staff and managers at multiple bureaus told us that the City still needs to focus more on climate adaptation. Without clear goals and strategies, the City could select climate actions that are less efficient or effective in addressing Portland's biggest climate risks. The City also may not be able to track progress on adaptation work because there are not specific goals to measure performance against.

Climate mitigation is important to prevent the worst impacts of climate change. Climate adaptation is also important because the community is already experiencing impacts of climate change, especially frontline communities. Managers and staff from multiple bureaus told us that adaptation work was a last minute addition to the 2022 Plan and that more focus is needed in this area.

An evidence-based approach can help the City tackle adaptation work. The City is currently working on a Climate Change Risk Assessment, a scientific assessment to improve its understanding of Portland's climate risks. This assessment can provide scientific evidence to inform the City's adaptation goals and strategies.

Community groups can also inform effective adaptation strategies. Engagement helps community members visualize how climate change is likely to impact them and to identify opportunities associated with adaptation strategies. The City can also secure support for climate actions by engaging community groups. Community support can make these actions more effective by achieving change at a scale beyond what the City can achieve on its own.

Increased transparency could help build trust with external groups and ensure climate actions are implemented

It is important for climate action planning to be transparent because there are many groups with an interest in or ability to influence climate action. Climate action planning should be an inclusive, collaborative process with input from a diverse network of internal and external groups. Internal groups include the bureaus responsible for completing climate actions. External groups include community members and businesses involved in or impacted by climate actions. The City can increase transparency to build trust with external groups and to coordinate its climate work.

Building trust is especially important for a climate justice approach because frontline community members have been harmed by the City's actions. Council's 2020 climate emergency declaration acknowledges that the City's historically racist land use policies and discriminatory real estate, planning, and infrastructure investment practices resulted in greater climate impacts for frontline communities. Frontline communities may experience significantly higher ambient temperatures, higher utility bills, poorer air quality, and greater health risks. Increasing transparency is one way the City can build trust with these vulnerable communities, with the broader community, and with all external partners.

Transparently communicating how the City prioritizes climate actions could help build trust by demonstrating that decision-making is fair in how actions were chosen or prioritized. Best practices say that actions should be prioritized based on a transparent, multi-criteria assessment. This approach considers multiple factors to highlight actions that advance several goals at once or benefit one goal while creating tradeoffs for another. Management from Planning and Sustainability told us that it had an internal strategy for assessing multiple criteria and prioritizing actions in the 2022 Plan by focusing bureaus and City elected officials on key actions within their authority. But Planning and Sustainability did not transparently communicate this strategy in the Plan. Managers and staff told us they were trying to complete the 2022 Plan in a short period of time to respond to specific needs.

Describing climate actions in more detail could also help ensure internal and external groups have enough information to implement actions. Climate actions in the 2022 Plan lacked sufficient detail to facilitate implementation with bureaus and external partners.

For example, actions do not always include information about timeframes, costs and responsibilities. Not enough detail could limit the ability of bureaus to coordinate with each other and with external partners. Insufficient detail could also limit the City's ability to track progress on climate work effectively because it may be difficult to determine whether actions are on schedule, adequately resourced, or who is responsible for implementing them.

Figure 5. Climate actions lacked sufficient detail about timeframes, costs, and responsibilities

Type of Detail	2022 Plan gaps	Example
Timeframes	21 percent of actions do not have clear timeframes	Some actions are labeled as "To Be Determined" for timeframe
Costs	26 percent of actions do not have information about estimated staffing or funding shortages	The plan includes estimated staffing and funding shortages instead of overall costs Some actions are labeled as "To Be Determined" for estimated staffing and funding shortages
Responsibilities	100 percent of actions clearly identify responsible bureaus, but do not clearly identify external partners or define their roles	Some actions reference that the responsible bureaus will be working with the community, other bureaus, or agencies but do not clearly identify these other actors

Source: Audit Services' analysis of the 2022 Climate Emergency Workplan

Bureaus are still working to carry out most of the actions described in the 2022 Plan, but there are no plans to transparently communicate progress on actions because the plan is expired. The City previously communicated updates on the 2022 Plan through

progress reports and a series of public events before the Plan expired in 2025. There will be an interim period between the expiration of the 2022 Plan and the creation of a new plan. Staff described the typical planning process taking around two years to complete. Some community groups, community members, and a business group emphasized the importance of moving quickly on climate action given the urgency of the climate crisis. Continuing to transparently communicate progress on current work while a new climate action plan is developed can help build trust with external partners that it is acting with urgency.

A community engagement strategy could help the City achieve its climate goals

Engaging the community is critical to the success of climate action plans. Community engagement should be transparent and include agreed upon goals amongst a diverse set of external partners, including frontline communities. External partners should also inform the selection of climate actions.

The City included limited community input while developing the 2022 Plan. The City engaged community in the creation of Council's 2020 climate emergency declaration which informed the 2022 Plan. However, we heard from multiple bureaus that the community was not fully involved in informing the selection of actions. Management told us that they focused on engaging community for policy work over plan development due to limited resources. This may have also been due to frustration. Managers and staff told us that staff and community were frustrated by community engagement efforts for climate work between the 2015 Plan and the 2022 Plan. The City attempted to more fairly engage with the community during that time, but management said that the attempt left everyone feeling like they didn't know how to move forward.

Managers and staff from Planning and Sustainability and the Sustainability Office said community involvement has improved since those earlier efforts but acknowledged that community members still want more meaningful engagement. Some community-based organizations and community members suggested that the City could improve by sharing more climate work information with the community, clarifying how community groups can engage in climate work, and involving community groups in decision making.

Community groups can also feel burdened by repeated requests from government for the same information, especially if they are not compensated for their time. Some community groups told us that they want to be more fairly compensated for their time working with the City. In addition to working with the City, community groups also engage with other local jurisdictions. For example, some community groups are helping develop Multnomah County's upcoming climate action plan. Community groups are

involved in climate work across the region. To address potential burden, the City can consider compensating groups for engaging in its effort.

The City could also incorporate information from climate work that community groups have already participated in, to reduce the burden of repeatedly asking them the same questions. There are many sources of information available from the City's past climate work and the climate work of other local jurisdictions. For example, community groups helped identify 12 regional climate goals for Multnomah County's upcoming climate action plan. Community groups also provided feedback on climate for Council's 2020 climate emergency declaration and in 2022 listening sessions related to efforts to change the City Charter. Different bureaus also engage community groups to implement climate actions. The City could use existing information and plan future engagement to be more focused and relevant for community groups.

The Sustainability and Climate Commission structure offers a new opportunity for engaging community for the next climate action plan. The commission is made up of community members who represent themselves as individuals rather than represent community groups. The City will still need to engage with community groups and the Commission could help inform that strategy.

Developing a strategy to address engagement challenges can help community engagement to be more meaningful and have more impact. Clear expectations and transparent communication could help address past issues of not knowing how to move forward. A strategy can include a communication plan to help inform community members about the purpose of engagement, the benefits for participants, and how their input will be used. It can also include feedback mechanisms to enable evaluation and adjustments that are responsive to the needs of community. A community engagement strategy can also apply to all phases of the climate action planning process including planning and implementation.

Continuing to improve engagement with community groups can help the City build stronger partnerships that benefit climate work. Inclusive engagement builds widespread support, encourages action and investment from the community, fosters credibility, and strengthens the resulting climate action plan. Stronger partnerships with the community can ultimately help the City achieve its climate goals.

Recommendations

To ensure the City follows through on climate commitments:

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.

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.

To more effectively address community climate impacts:

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.

To build trust with external groups and enable achieving climate goals:

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.
5. The 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.

The City Administrator agreed with our recommendations

We provided this report to the City Administrator and the Deputy City Administrator for Community and Economic Development. The City Administrator responded on behalf of the City and agreed with our audit recommendations.

How we did our work

The audit objectives were to determine how the City prioritized and coordinated climate action and the extent to which the City considered impacts to community and integrated community involvement into its climate action work.

The scope of the audit was climate actions from the 2022 Climate Emergency Workplan.

To accomplish our objectives, we:

- Interviewed managers and staff involved in climate work from Planning and Sustainability, the Sustainability Office, the Water Bureau, the Bureau of Transportation, the Bureau of Fleet and Facilities, the Bureau of Environmental Services, Parks & Recreation, and the Citywide Asset Managers Group.
- Interviewed representatives from community-based organizations representing frontline communities, community-based organizations focused on climate work, and a business organization.
- Reviewed community feedback and regional climate goals and an environmental justice zine created by community groups
- Analyzed Citywide and bureau-level planning documents, the 2020 Climate Emergency Declaration and associated progress reports, and the 2022 Climate Emergency Workplan and associated progress reports.
- Reviewed best practices for climate planning and government management from the United Nations, C40 Cities, the U.S. Global Change Research Program, the National Association of Climate Resilience Planners, Committee of Sponsoring Organizations of the Treadway Commission, and Government Finance Officers Association; City reports; policies; and other audits.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

City of Portland

Office of the
City Administrator
1221 SW 4th Ave.
Portland, OR 97204

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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