

From: [Virginia Ehelebe](#)
To: [Council Clerk – Testimony](#)
Subject: Housing Emergency Declaration Metrics (Item 202)
Date: Tuesday, March 30, 2021 11:40:54 AM

Dear Mayor Wheeler and City Commissioners,

I urge the Council, as it prepares to extend the housing emergency declaration once again, to fully honor its October 2017 pledge to spell out the criteria for declaring an end to the emergency. Ordinance 189387 took a first step, by identifying indicators concerning homelessness and housing affordability. These indicators, however, are not actionable enough on their own to justify ending or extending emergency declarations, in my view. Two other elements need to be specified: namely, the data series to be used to track those indicators; and—most crucially—the numerical yardsticks used to determine if those data series signal a housing emergency exists.

—Devising such metrics is not an easy task but it is doable. I am confident some of the good citizens of Portland well versed in housing-related statistics could, for example, compile a list of timely, consistent, and reliable data series that would be the foundation of clear, actionable triggers for declaring the start or end of a housing emergency. They also could act as a sounding board for the tricky task of deciding what type of numerical yardsticks to use. Two obvious questions are: should those metrics be framed in terms of national, regional, and similar-city averages? Should actionable triggers be the most recent data points or longer term trends?

—The S2HC proposal to include the housing emergency and shelter shortage concepts in Title 15 adds to the importance of fleshing out these criteria sooner rather than later. The misunderstandings swirling around the shelters-in-parks issue certainly give Portlanders a greater appreciation of the emergency powers that code confers. Those powers call for judicious and precise application of emergency and crisis labels. The “continuing emergency” phrase used to describe the housing and shelter emergencies in the S2HC FAQs fails to meet this standard; it is uncomfortably close to framing those issues as “ongoing crises,” which arguably conflates a true crisis (such as widespread starvation caused by crop failure) with a chronic problem (food insecurity). Such formulations can end up skewing public policy priorities. And they sow confusion among the public, especially when applied to issues—such as homelessness—where varying definitions already fuel misunderstandings about policy initiatives. Explicit yardsticks, rather than elastic definitions, would drive sound policies and give Portlanders greater confidence that the city government is acting both reasonably and responsibly.

I know the Council has been inundated in recent weeks with S2HC-related suggestions and will therefore touch lightly on mine, which center on the proposed outdoor shelter code. I believe it contains skewed incentives, ones that will spur almost all new operators to set up low-cost bare bones villages rather than follow the Kenton’s Women Village (KWV) model. That would be unfortunate for Portland’s unhoused and housed residents alike. Differentiated zoning code privileges (such as by right status for KWV-style villages, but conditional use approval for those not offering high-quality services and dwellings) would help remedy this problem. Explicit code language on licensing also is needed, in my view. These changes obviously would take time to draft and vet.

That leads me to one here-and-now-S2HC-suggestion: heed the plea from numerous Eastside community residents to hold off on any permanent code changes for now. Enactment of the new housing emergency declaration allows time for revisiting not only the RV/THOWs proposals—as Commissioner Mapps has recommended—but also the outdoor shelters and the parks issues. Indeed, I think a new, less confusing framework is needed—one that clarifies rather than obscures the underlying policy vision.

Respectfully,

Virginia Ehelebe

City Council Meeting - Wednesday, March 31, 2021 2:00 p.m.

Agenda No.	First	Last	Zip
202.1	Tim	McCormick	97219
202.2	Sean	Green	97212
202.3	Katelynn	Nyssen	97236
202.4	Gay	Greger	
202.5	Linda	Robinson	
202.6	Zari	Santner	
202.7	Patricia	Frobes	