

March 13, 2021

Dear Mayor Wheeler and Commissioners Hardesty, Mapps, Rubio, and Ryan:

As parks, natural areas, & trails supporters, we are writing to strongly advocate for an important change in the language of Shelter to Housing Continuum recommendations from the Planning and Sustainability Commission. **We recommend the removal of Open Space Zones from consideration for either temporary or permanent houseless shelters EXCEPT for a declaration of emergency by the City Council due to a catastrophic natural disaster.**

We appreciate the consideration, research and thought that staff and commission members put into the S2HC report and its associated recommendations. The misery and distress that houseless people suffer in our community is a heart-rending consequence of decades of inequality, ill-considered policy and economic failures. Houselessness is not new to Portland but has grown rapidly in recent years and seems likely to continue to increase as we deal with the long shadow of this pandemic. We believe the majority of the recommendations will do much to help Portland address our houseless crisis.

Our concern is focused on the recommendation that allows temporary shelters in public Open Space. We recommend that Open Space, including developed parks, natural areas, and trails, be removed from consideration for siting of either permanent or temporary shelters. Our rationale is outlined below.

1. Availability of Vacant & Underutilized Land - Because adequate alternatives exist, there is no need to site temporary or permanent shelters in the Open Space Zone.

A BPS staff report to the PSC makes this abundantly clear: “The Buildable Lands Inventory showed us that we have plenty of land to meet the City's housing needs, for everybody. The constraint on affordability and shelter facilities is the cost of land and the cost of construction and operations, not the amount of available vacant and underutilized land. If we have enough land to house everybody, it is logical to assume we can find space for the facilities used to shelter people currently not housed. So no, we do not need . . . Open Space to meet that need.”

2. Equity and Access - Allowing shelters in public open space removes that space from use for intended park purposes by everyone else.

Increasingly, Portland residents live in spaces with no yard or outdoor area whatsoever. As our population increases and densifies, the role of parks, natural areas and trails becomes more and more essential. Looking ahead, the need for even more parks and open space will be critical to maintain our region's livability for all. Changing the allowed uses for properties in the Open Space Zone makes it unavailable for its intended use.

Over the past twenty years, Portland voters have consistently approved tax measures to address inequities in access to parks, natural areas, and trails, most recently approving a

new Parks levy in November 2020, in the midst of the pandemic. Obviously, access to these special places is important to our citizens. We cannot betray that trust.

3. Physical & Mental Health - Nature is not just a nice thing to have – it is fundamentally important for our health, well-being and happiness.

Study after study has confirmed that regular contact with nature is required for mental health and well-being. When people visit parks and green spaces, they benefit from a reduction in anxiety, depression, and stress. Ensuring that these places are always there for *everyone* is critical for the health of our entire community.

The pandemic has highlighted the immensely important role that parks and natural areas play in a densely populated urban environment. On July 31, 2020, a *Washington Post* article entitled “Pandemic underscores how public parks shape public health” reported that “Traffic to local parks is up dramatically [in the pandemic] as people seek safe outdoor places for recreation. Online searches for terms like “trails near me” . . . have spiked to unprecedented levels in recent months.”

4. Negative Impacts on the Resource - The environmental impacts of outdoor shelter are real and are difficult, if not impossible, to mitigate.

Chapter 33.296 of the Portland City Code “allows short-term and minor deviations from the requirements of the zoning code for uses that are truly temporary in nature, will not adversely impact the surrounding area and land uses, and which can be terminated and removed immediately.” Siting permanent or temporary shelters in the Open Space Zone would be in direct conflict with the intent of this chapter. When protected and well managed, urban wildlife habitat makes important and measurable contributions not only to urban wildlife, but also to clean air and clean water. Sadly, these areas are already under stress. We see around us the negative environmental impacts resulting from unsanctioned camping in open space. It does not take long for the things we value most in our parks, natural areas and trails to be destroyed by overuse or inappropriate use. Siting larger, sanctioned camps or shelters in parks or natural areas, even on a “temporary” basis, is a policy decision that would do irreparable harm.

5. Long Term Character of this Emergency – Unfortunately houselessness is not a temporary problem.

In the event of an emergency caused by a natural disaster, such as an earthquake, there is no question that public open space must be made available for temporary shelters. The humanitarian crisis related to our houseless community certainly qualifies as an emergency, but it is an emergency that is ongoing and manmade. It must fall into a separate category.

The S2HC report acknowledges this fact in the 15.04 commentary: “Portland’s housing emergency was first declared in 2015 and has been extended several times. These extensions have highlighted that the need for shelter is not an episodic emergency, with a discrete beginning and end, but is a continuing crisis.” It is understood that the need

to provide shelter options for our houseless population will be required long into the foreseeable future. The fact is temporary shelters placed in the Open Space Zone would most likely not be temporary at all.

For the reasons outlined above, we believe there is no compelling rationale to support inclusion of Open Space for siting temporary or permanent shelters. The long-term impacts would be severe and the resources and time required for restoration would be extraordinary. Portland can and must do better than surrendering its parks, natural areas, and trails to any use, temporary or permanent, that jeopardizes their primary purpose - now and into the future.

In making this recommendation, we are not saying that parks have no role to play in helping to address the houseless crisis. On the contrary, Parks are already making a significant contribution. PP&R's restrooms are available to all park users at 70 parks throughout the city and, during the pandemic, the bureau has nearly doubled that amount in order to ensure access to hygiene. In partnership with five different school districts, PP&R hosts a free lunch program in the summer – complementing the program offered through the schools during the school year. Finally, Parks has always opened community centers in response to extreme weather conditions or other short-term emergencies such as Covid-19, and we support such temporary uses in these facilities.

With their talented team of parks and recreation professionals, we know there are many more creative ways that PP&R can support the S2HC effort. However, siting shelters in public open space should not be one of them.

Thank you for this opportunity.

Our Specific Recommendation

- 1. Amend language in 33.296.030.G to remove the Open Space Zone from consideration as either temporary or permanent houseless shelters EXCEPT for a declaration of emergency by the City Council due to a catastrophic natural disaster such as an earthquake**
- 2. Amend language in the new provision 33.296.030.H to add an exception for the Open Space Zone.**

Respectfully submitted by the following individuals and organizations

Darlene Carlson	Parks Advocate and former PP&R employee
Mary Anne Cassin	Parks advocate, volunteer, and 25 year PP&R employee
Patricia Frobos	Parks Advocate
Gay Greger	Parks Advocate, volunteer, and 24 year PP&R employee
Michelle Harper	PP&R Citywide Collaborative Services Mgr, retired
Susan Kelly	Parks advocate, City Club Past President
Mary Ruble	Parks Advocate
Zari Santner	Parks advocate and retired Director of Portland Parks and Recreation
Jim Sjulín	Parks and trails advocate
Kia Selley	Parks Advocate

Organizational Co-Signers

Portland Chapter, American Rhododendron Society
- Crystal Springs Rhododendron Garden

Brentwood Darlington Neighborhood Association

East Portland Parks Coalition

Friends of Laurelhurst Park

Leach Garden Friends

Friends of Marquam Nature Park

Pleasant Valley Neighborhood Association

Portland Garden Club

Portland Parks Foundation

Individual Co-Signers

Mike Abbate	Parks Advocate and Former Director of PP&R
Dick Adams	Parks Advocate
Deborah Adams	Parks Advocate
Paul Agrimis	Parks Advocate
Stan Amy	Parks Advocate
Lenny Anderson	Trails Advocate
Eileen Argentina	Parks Advocate
Mary Auch-Hankins	Parks Advocate

Gene Avery	Parks Advocate
Susan Avery	Parks Advocate
Jules Bailey	Chair, Portland Parks Foundation
Dean Baker	Parks Advocate
Cynthia Bankey	Park Advocate, Urban Designer
Lynn Barlow	Parks Advocate
Hal Barwood	Parks Advocate
Janet Bebb	Parks Advocate
Jerry Bier	Parks Advocate
Suzanne Bishop	Parks Advocate
Kelley H. Bishop	Parks Advocate
Mort Bishop	Parks Advocate
Andrew Black	Parks Advocate
Henry Blair	Parks Advocate
Laurie Blair	Parks Volunteer
Dick Boak	Parks Advocate
Gabriel Bocanegra	Parks Advocate
Yvonne Boisvert	Parks Advocate
Cara Bolles	Parks Advocate
Kimberly Bown	Parks Advocate
Bonnie Bray	Parks Advocate
Lila Brightbill	Parks Advocate
Jan Brittain	Parks Advocate
Alice Brocoum	Friends of Tanner Springs
Ann Brown	Parks Advocate
Roger Brown	Parks Advocate
TJ Browning	Parks Advocate
Kim Buchanan	Parks Advocate
Sean Burgess	Parks Advocate
Mike Burnett	Parks Advocate
Bennett Burns	Parks Advocates
Robin Busch	Parks Advocate
Barbara Bushong	Friends of Tanner Springs
Kristin Butler	Parks Advocate
Michael Butler	Parks Advocate
Michael Carlson	Parks Advocate
Don Carlson	Parks Advocate, Past Chair - Parks Golf Advisory Committee
Joanne Carlson	Parks Advocate
Ann C. Carter	Parks Advocate
Brenda Carpenter	Parks Advocate, Member of Parks Golf Advisory Committee
Geoff Carr	Parks Advocate
Laurie Causgrove	Parks Advocate & Volunteer
Pat Chandler	Parks Advocate

Leslie Chigbrow	Parks Advocate
Ronald J. Clemenson	Parks Advocate
Julie Coe	Co-leader: Friends of Laurelhurst Park
Bill Coffman	Parks Volunteer
Sonja Connor	Parks Advocate
Joe Cortright	Parks Advocate
Kathy Couturie	Parks Advocate
Emily Crumpacker	Parks Advocate
Martha Cryan	Parks Advocate
Lynda Darling	Parks Advocate
Judith Dauchy	Parks Advocate
Jackie Davis	Parks Advocate
Kelly Davis	Parks Advocate, Co-Chair Rose City NA
Sheri Davis	Parks Advocate
David Dawson	Parks Advocate
Eleanor Kay Dawson	Parks Advocate
Maureen Delaney	Parks Advocate
Jeffry Dennis	Parks Advocate
Jane Dennis	Parks Advocate
Leslie Dimitman	Parks Advocate
Judy Douglas	Friends of Tanner Springs
Bob Downing	PP&R Parks Maintenance Manager, parks advocate, and parks volunteer
Charles Duffy	Parks Advocate
Shannon Duffy	Parks Advocate
Lisa Eddleman	Parks Advocate
Christian Eddleman	Parks Advocate
Keely Edmonson	Former PP&R employee, Park Advocate, and mother of 7 & 9 year old park users.
Ginger Edwards	Parks Advocate
Carol Erickson	Parks Advocae
Judy Farmer	Parks Volunteer
Nancy Faulk	Friends of Tanner Springs
Kenyon Fink	Parks Advocate
Tom Fischer	Parks Advocate
Keith Fleming	Parks Advocate
Stephanie Fleming	Parks Advocate
Linda Fogerson	Parks Advocate; Board Member - Friends of Mt. Tabor Park
Joan Foley	Parks Advocate
Stephanie J. Frederick	Parks Advocate
Ted Frison	Parks Advocate
Sherry Fullerton	Parks Advocate
Patty Freeman	Parks advocate

Christie Galen	Wildlife Ecologist & member of City's Terrestrial Ecology Enhancement Strategy Advisory Group
Jeanne Galick	Parks Advocate
Bob Gandolfi	Parks Advocate, Parks Foundation
Marshall Gannett	Research Hydrologist; Oregon Academy of Science 2017 Outstanding Oregon Scientist
Martha Gannett	Parks Volunteer
Jim Gardner	Parks Advocate
Martha Gardner	Parks Advocate
Peggy Glascock	PP&R Parks Maintenance Supervisor, retired; Friends of Laurelhurst Park
Sue Glenn	35 year Parks & Recreation Professional; former PP&R Zone Services Manager
Share Gilbert	Parks Advocate
Avel Gordly	Former State Senator, Parks Advocate
Jon Gove	Parks Advocate
Marti Granmo	Parks Advocate
David Haleston	Parks Advocate
Mary Anne Hannibal	Parks Advocate
Denise Hannon	Parks Advocate
Linda Hannon	Parks Advocate
Tricia Hardie	Parks Advocate
Susan Hartnett	Parks Advocate
Shannon Hartwell	Parks Advocate
Warwick Harvey-Smith	Parks Advocate, recently moved from Portland
Candace Harvey-Smith	Parks Advocate, recently moved from Portland
Susan Hathaway-Marxer	Parks Advocate & 12 years as PP&R's Property Manager
Kay Heiney	Parks Advocate
Robert Heiney	Parks Advocate
Mary Beth Henry	Parks Advocate
Laura Herbon	Parks Advocate
Damon Hess	Parks Advocate
Vicki Hess-Smith	Parks Advocate
Denise Hill	Parks Advocate
Ann Marie Hofbauer	Parks Advocate
Donna Sunseri Howard	DMH Accountant
Bob Hrdlicka	Parks Volunteer
Jill Hrdlicka	Parks Volunteer
David Hudson	Parks Advocate
Thomas Hughes	Parks Advocate
Vanessa Hughes	Parks Advocate
Carol Hutchins	Parks Advocate
Roberta Hyde	Park Advocate & 27-year employee at Mt. Scott Community Center
Valerie Ilsley	Parks Advocate
Gretchan Jackson	Parks Advocate

Melinda Jackson	Parks Advocate
Robin M Jensen	Friends of Marquam, West Willamette Restoration Partnership
Janet (Tami) Jewett	Parks Advocate
Alan Jewett	Parks Advocate
Pat Jewett	40 Mile Loop & North Portland Greenway Board Member
Connie Johnson	Parks Advocate
Dennis Johnson	Parks Advocate
Mark Johnson	Parks Advocate
Suzanne Jones	Parks Advocate
Dion C. Jordan	Former PP&R Board Member
Roberta Jortner	Parks Advocate
Karl Jortner	Parks Advocate
David Judd	Parks Advocate
Laurel Kaufman	Parks Advocate & Volunteer
Paul Kaufman	Parks Advocate
Jim Kelly	Co-founder, North Star Civic Foundation
Tom Kelly	President, Neil Kelly Co., Past President Prosper Portland
Kate Khline	Parks Advocate
Katherine Killops	Parks Advocate
Kristin Killops	Parks Advocate
Melissa Kim	Friends of Mt. Tabor
Arlene Kimura	Hazelwood N.A./East Portland Neighbors
Mary Kinnick	Parks Advocate
David Kish	Parks Advocate
Monica Klau	Parks Advocate
Jeff Knapp	Parks Advocate
Janet Knipe	Parks Advocate
Alice Knouff	Friends of Laurelhurst Park
Morley Knoll	Parks Advocate
Korleen Kraft	Retired Real Estate Broker
Julie Kupers	Parks Volunteer
Mary Lang	Parks Advocate
Marilyn Laufenberg	Parks Advocate
Theresa Leonard	Parks Advocate
Laura Lester	Parks Advocate
Deborah Lev	Former Portland Parks and career natural resource planner
Christen Lincoln	Parks Advocate
Mike Lindberg	Former Portland City Commissioner in Charge of Parks & Recreation
Paul Linnmann	Parks Advocate & formal member of the Parks Advisory Committee
Christie Little	Parks Advocate & former member of the Parks Advisory Committee
Constance Lively	Parks Advocate
Dawn Lottsfeldt	Parks Advocate

Nancy Lynn	Parks Advocate
Gene Lynard	Parks Advocate
John & Pam Maas	Parks Advocate
Betsy H. MacKay	Parks Advocate
Dominic Mara	Parks Advocate
Gayle Marechal	Parks Advocate
Kurt Marion	Parks Advocate
Susannah Marriner	Parks Advocate
Ken Martin	Parks Advocate
Jepi Martin	Parks Advocate
Roger Martin	Parks Advocate
Larry Marxer	Parks Advocate & golfer
Gail Massoli	Friends of Tanner Springs
Susan Masta	Parks Advocate
Carol Mayer-Reed	Parks Advocate and Principal, Mayer/Reed Inc.
Kyle McAvoy	Parks Advocate
Brenda McCool	Parks Advocate
Brian McCool	Parks Advocate
Brenda McCool	Parks Advocate
Margaret McGowan-Tuttle	Parks Advocate
Clark McCool	Parks Advocate
Mary McGilvra	Parks Advocate
Carrie	Parks Advocate
Sarah McGraw	Parks Advocate
Susie McKelvey	Parks Advocate
Kerianne McKeon	Parks Advocate
Maggie Mead	Parks Advocate
Erin J. Miller	Parks Advocate
Nicola Miller	Parks Advocate
Walt Mintkeski	Former Board Chair & current Advisory Circle Chair of the Johnson Creek Watershed Council
Stephanie Montgomery	Park Advocate
Cynthia Mooney	Park Advocate
Jim Mooney	Park Advocate
Becca Smith Morgan	Park Advocate
Ryan Morgan	Park Advocate
Joyce Morrelli	Park Advocate
Linda Morrow	Parks Advocate
Bruce Murray	Parks Advocate
Melissa Naito	Parks Advocate
Katie Neill	Parks Advocate
Diane Naseth	Parks Advocate
Gary Naseth	Parks Advocate

Marianne Nelson	Parks Advocate
Martha E. Nielsen	Parks Advocate
Fred Nilsen	City Nature Westside Supervisor (including Hoyt Arboretum and Forest Park), retired
Jocelyn O'Brien	Parks Advocate
Patrick O'Brien	Parks Advocate
Ann O'Reilly	Parks Advocate
Candace Overman	Parks Advocate
Ken Overman	Parks Advocate
Jim Owens	Parks Advocate
Thomas Palmer	Parks Advocate
Paul Papak	Parks Advocate
Carolyn Parchinsky	Parks Advocate
Elizabeth Parkman	Parks Advocate
Leonora Perron	Parks Advocate
Julia Person	Parks Advocate & Member Parks Golf Advisory Committee
Kathy Phoutrides	Parks Advocate
Leslie Pohl-Kosbau	Parks Advocate
Brandy Poirier	Parks Advocate
Cici Polson	Volunteer Pittock Mansion
Ken Poorman	Parks Advocate
Sue Poorman	Parks Advocate
Jane Pullman	Friends of Tanner Springs
Ron Query	Friends of Tanner Springs
Wendy Rankin	Parks Advocate
Meryl Redisch	Parks Advocate
Laura (Lou) Reynoldson	40 Mile Loop Land Trust Board President
Linda Robinson	East Portland Parks Advocate
Tony Rosenast	Parks Advocate
John Rosenthal	Parks Advocate
Marti Rosenthal	Parks Advocate
Emily Roth	Parks Advocate
Colin Rowan	Parks Advocate
Andrew Rowe	Parks Advocates
Francie Royce	Trails Advocate
Scott O. Pratt	Parks Advocate
Craig J. Ruble	Parks Advocate
Gaye Rumsey-Riggs	Parks Advocate
Alex Salizar	Park Maintenance Supervisor 25 years, retired
Allyson Savage	Parks Advocate
Kelly Savage	Parks Advocate
Janet Schaefer	Parks Advocate
Barb Scharff	Jesuit Volunteer Corps and Friends of Trees.

Mary Ann Schmidt	Crystal Springs Partnership co-chair
Harry Schumacher	Parks Advocate
Donna Schreiner	Parks Advocate
Bob Schulz	PP&R Employee, Retired
Deborah Scott	Open space and trail advocate
Rochelle Scivens	Parks Advocate
Gary Scivens	Parks Advocate
Ethan Seltzer	Parks Advocate
Michele Shapiro	Parks Advocate
Doug Shapiro	Concerned Resident
David Shaw	Parks Advocate
Louise Shorr	PP&R City Nature Volunteer Coordinator, retired
Mark Smallwood	Parks Advocate
Roger Smith	Parks Advocate
Kathy Fong Stephens	Parks Advocate
Joan Stevens-Schwenger	Parks Advocate
Linda Stolz	Parks Advocate
Carol Stone	Parks Advocate
Barbara Surell	Parks Advocate
Laurie Sykes	Parks Advocate
Steven Tebor	Parks Advocate
C. Lyn Terry	Parks Advocate
Maria Thi Mai	Parks Advocate
Diana Thomas	Parks Advocate
Sarah Thomas	Parks Advocate
Sue Thomas	Parks user and advocate
Lynn Thompson	Parks Advocate
Liz Tilbury	Parks Advocate
Paddy Tillett	Member, Portland Parks & Recreation Board
Thuy Tu	Parks Advocate
Patty Turner	Parks Advocate
Linda Twitchell	Parks Advocate
Krista Van Engelen	Parks Advocate
Susan Van Winkle	Co-Lead: Friends of Laurelhurst Park
John J. Vecchio	Parks Advocate
Stan Vernon	Parks Advocate
Julie Vigeland	Parks Advocate
Bob Visdos	Parks Advocate
Thanh-Thuy Vominh	Friends of Mt. Tabor
John von Schlegell	Parks Advocate
Frances von Schlegell	Parks Advocate
Keith Walters	PSU Emeritus Professor
Beth Warner	Parks Advocate

Reinier Warschauer	Parks Advocate
Harriet Watson	Past President, City Club, and founding director, Portland Parks Foundation
Roger Weaver	Parks Advocate
Joy Weaver	Parks Advocate
Mary Welch	Parks Advocate
Richard Wenzel	Friends of Tanner Springs
Dayna D Wenzel	Friends of Tanner Springs
Jonathan West	Parks Advocate
Tim White	Parks Advocate
Stacie White	Parks Advocate
Caroline Whitney	Parks Advocate
Rachel Wiener	Parks Advocate
Terry Wiesner	Parks and Golf Advocate
Melinda Williams	Parks Advocate
Nancy Williams	Parks Advocate
Karen Willoughby	Parks Advocate
Mark Griswold Wilson	Portland Parks Ecologist, retired
Mary Wilson	Parks Advocate
Jay Withgott	Parks Advocate
Lynn O'Brien Wolfe	Parks Advocate
Jo Wright	Parks Advocate
Lance Wright	Parks Advocate, retired PP&R horticulturist
Schuyler Wright	Parks Advocate

