

March 1, 2021

Dear Mayor Wheeler and members of the Portland City Council,

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 fund 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, wellbeing 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 myriads of other creative ways that PP&R can support the S2HC effort. However, siting shelters in public open space should not be one of them.

We would welcome the opportunity to meet with you to discuss this issue further. We also plan to submit testimony at the March 17 hearing.

### **Proposed Amendments to the S2HC Recommendations**

- 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.**