

March 17, 2021

Ted Wheeler, Mayor  
City Commissioners  
1220 SW Fourth Avenue  
Portland, OR 97204

Mayor Wheeler and Commissioners,

I am writing to ask you to address two crises that are raised in the recommended Shelter to Housing Continuum. One is humanitarian, the other ecological. The first relates to a lack of affordable housing and homelessness. The second stems from degradation of the city's and Metro's natural area parks and ecologically sensitive lands as a result of widespread encampments. Today you have the opportunity and moral obligation to tackle both of these challenges.

I urge you to adopt the recommendations contained in the proposed Shelter to Housing Continuum code rewrites which take Open Space off the table for permanent shelters. This is consistent with the recommendation of the Bureau of Planning and Sustainability staff and the Planning and Sustainability Commission.

However, I also urge you to eliminate all lands with an Environmental Conservation (EC) or Environmental Protection (EP) overlay, regardless of the underlying zone. This is important because not all EP or EC environmental zones are necessarily in the Open Space Zone. I ask you do the same for floodplains, natural hazard lands, and regional trail corridors such as Springwater on the Willamette; Springwater Corridor; and 40-Mile Loop. All of these areas are both inappropriate for individual or group camping owing to the fact that those uses negatively impact these areas, are far from services, and are "out of sight, out of mind" and fail to provide humane living conditions.

Temporary Shelters: I also ask that you ensure the city's parks and natural resources are protected from random and sanctioned encampments. I urge you to remove the city's and Metro's natural area parks and regional trail corridors such as Springwater on the Willamette; Springwater Corridor; and 40-Mile Loop from consideration for temporary shelters.

Please amend 33.296.030.H (page 78, Volume 2, Shelter to Housing Continuum) as follows:

"This new provision accommodates the temporary operation of a mass shelter or an outdoor shelter on a site in all zones, with the exception of city and Metro's publicly owned natural area parks; land with an Environmental Conservation (EC) or Environmental Protection (EP) overlay; floodplains, and natural hazard lands, and regional trail corridors such as Springwater on the Willamette; Springwater Corridor; and 40-Mile Loop, of the city for up to 180 days within a calendar year."

Finally, while the Shelter to Housing Continuum code changes does not directly address it, there is a second issue that also constitutes an ongoing emergency. The issue is

unsanctioned individual and large encampments. Land managers in the city and at Metro have documented both the ecological and significant financial impacts individual camping and larger encampments have had on their properties. The environmental impacts include: soil compaction, cutting of trees, removal of understory vegetation, human waste in streams and wetlands, wildlife harassment, wildfire, millions of dollars of restoration undone and millions more in additional restoration, irreversible loss of ecological functions.

These impacts are not restricted to City of Portland parks and natural areas and Bureau of Environmental Services water quality and natural area restoration sites. Metro Parks and Nature program has also submitted testimony to the Planning and Sustainability Commission documenting impacts to their properties. I have included a PowerPoint presentation with images from Metro, the Johnson Creek Watershed Council, and my own photos that illustrate the ecological impacts and inhumane living conditions in the city's and Metro's natural areas, floodplains and Environmental Protection and Environmental Conservation zones.

Many find these images troubling; and they are. They are not intended to discredit or otherwise denigrate those who find themselves without alternatives to camping in publicly owned natural areas or on ecologically sensitive areas. They represent the dual crises of homelessness and ecological degradation. Much public commentary and testimony decry the widespread impacts of trash or littering. Those impacts, while they do represent a legitimate quality of life concern, are ephemeral. My concern is the long term, and in some instances irreparable, impacts on the city's natural resources. They also illustrate the inhumane living conditions that predominate in these areas. The city must provide alternatives to these conditions. There are no silver bullets but adoption of the Shelter to Housing Continuum code changes, with the amendments I have suggested, is one program.

Respectfully,  
Mike Houck  
Park, Trail and Natural Area Advocate  
2433 NW Quimby Street, #4  
Portland, OR 97210  
503-319-7155  
[mikehouck@urbangreenspaces.org](mailto:mikehouck@urbangreenspaces.org)

cc Metro Council  
Jon Blasher, Metro Parks and Nature