



CITY OF PORTLAND ENVIRONMENTAL SERVICES



1120 SW Fifth Avenue, Suite 613, Portland, Oregon 97204 ■ Mingus Mapps, Commissioner ■ Michael Jordan, Director

M E M O R A N D U M

March 10, 2021

TO: Eric Engstrom, Principal Planner, Bureau of Planning and Sustainability

FROM: Marie Walkiewicz, Senior Water Resources Planner

RE: Shelter to Housing impacts on sanitary and stormwater systems

This memo summarizes the Bureau of Environmental Services' assessment of the provisions of the Shelter to Housing Continuum (S2HC) Project to determine their potential impact on the bureau's ability to meet the sanitary and stormwater needs of all Portlanders.

BES regularly analyzes the sanitary sewer and stormwater system needs in the city, in conjunction with the Bureau of Planning and Sustainability's planning projects, to ensure that Portland residents and businesses have adequate sanitary and stormwater service. Based on an understanding of current and anticipated growth in the city and system conditions, BES identifies priority areas for upgrading infrastructure, improving system capacity, and providing programs needed to serve the community's needs related to clean water and public health. BES reviewed the S2HC project's recommended Title 33 code amendments and does not anticipate the amendments will have significant impacts to our sanitary or stormwater systems.

The S2HC amendments add flexibility for shelter siting; establish outdoor shelters as a new community service use; liberalize the allowances for group living; and, allow permanent occupancy of recreational vehicles and tiny houses on wheels.

- The expanded allowances and streamlined regulations for homeless shelters will increase the availability of safe and healthy housing options for the large number of people currently living in unauthorized camps. It is expected that many people will move to shelters where they have access to water, hygiene and dignified sanitation. This will reduce the risks of human waste from unauthorized camps impacting BES facilities or reaching local waterways.
- The new zoning provisions to allow group living uses to occur more broadly in single dwelling zones will not significantly impact sanitary or stormwater systems because they limit group living to a similar scale as household living uses. Group living facilities over 3,500 square feet will be evaluated individually for utility adequacy as part of the conditional use review process.

- The S2HC provisions will allow occupancy of RVs and tiny houses on wheels on residential properties. If the RVs and THOWs have plumbing, the provisions require that they have sanitary service via a campground-style dump station connected to sanitary service on the site. The S2HC provisions significantly increase the availability of sites where occupied RVs and tiny houses can be located, reducing the likelihood they will become established in ROWs and other unauthorized locations. The provisions also seek to minimize the costs of establishing sewer connections. As a result, these provisions are expected to reduce the risk of unauthorized discharge of sewage to sewer and stormwater facilities, thereby reducing risks to human health and the environment.

The Shelter to Housing Continuum Project makes important strides in improving access to housing options for Portland's most vulnerable residents and associated access to safe and dignified hygiene and sanitation. The project increases flexibility in City codes and rules, where feasible, while also ensuring that the needs of all Portlanders are met. For these reasons, BES is pleased to support the project and its recommendations.