

Paula Sword

#278525 | March 17, 2021

Testimony to **Portland City Council** on the **Shelter to Housing Continuum Project, Recommended Draft**

Dear Council Members, I write to inform you that I disagree with your proposal to allow procedural shortcuts proposed by the Shelter to Housing Continuum proposal due to its direct conflict with the intent of Portland's Comprehensive Plan and Open Space Zone Designation. Furthermore, I would like to recommend that all references to temporary shelters in open spaces be removed with the exception of when there is a declaration of emergency by the City due to catastrophic natural disaster. To remind the public and council members, the Title 33, Section 100 of Planning and Zoning, dated 12/18/19 states in its opening remarks: Open Space Zone is "intended to preserve and enhance public and private open, natural, and improved park and recreational areas identified in the Comprehensive Plan. These areas serve many functions including: 1. Providing opportunities for outdoor recreation; 2. Providing contrasts to the built environment; 3. Preserving scenic qualities; 4. Protecting sensitive or fragile environmental areas; 5. Enhancing and protecting the values and functions of trees and the urban forest; 6. Preserving the capacity and water quality of the stormwater drainage system; and 7. Providing pedestrian and bicycle transportation connections." Within the open space zone Household Living and Group Housing is explicitly a non-allowable primary use. To circumvent this rule, the Shelter to Housing Continuum proposal provides the option to allow up to 180 days per year of temporary shelter and/or camping in an area zoned to "preserve and enhance public and private open, natural, and improved park and recreational areas". The Shelter to Housing Continuum proposal goes against the functions listed above in the following ways. 1. Providing opportunities for outdoor recreation; Allowing temporary housing and / or camping reduces outdoor recreational areas by decreasing access to areas for up to 180 days out of the year – or 50% of the year. Spaces will become unavailable as they are used semi-permanently; also, cleaning up of the temporary encampments increases the financial and resource burden on the city to maintain these areas further reducing opportunities for outdoor recreation. 2. Providing contrasts to the built environment; Temporary housing and / or camping does not provide a contrast to the built environment. For examples of how temporary structures look in contrast to the built environment, please visit one of the many existing encampments sitting next to Westmoreland Park, Oaks Bottom, and most bike corridors as well as along our creeks and waterways. Many of these temporary facilities take the area, use materials, and suggest other attributes of the built environment. 3. Preserving scenic qualities; Shelters of up to 180-days does not preserve scenic qualities as they are established long enough to impact the surrounding environment. 4. Protecting sensitive or fragile environmental areas; Shelters impact the sensitive and fragile environmental

areas going against what we teach our community around leaving no trace in these environments. It is impossible to leave no trace when a structure is erected in one place for periods of time. In addition, we have witnessed our creeks and waterways, such as Johnson Creek, be compromised by trash and human waste even when services and facilities are located directly adjacent to an encampment. 5. Enhancing and protecting the values and functions of trees and the urban forest; Encampments have impacted these areas through destruction of the trees and forest already. 6. Preserving the capacity and water quality of the stormwater drainage system; and Many open space designations are adjacent to creeks and watersheds. For an example of how the water quality is impacted, please visit the encampment under the Tacoma Street bridge along the Johnson Creek Watershed, about a quarter mile upstream from the Johnson Creek park; almost every day new homeless debris floats downstream. We also find human feces regularly adjacent to the park and available facilities impacting the designated watershed. I will add this same watershed is often used to teach the local preschool and day care children about nature. 7. Providing pedestrian and bicycle transportation connections. Due to temporary housing facilities pedestrian and bicycle transportation connections are already impacted with debris, reduced path width, and are perceived as unsafe. You may argue that sanctioned or supported shelters do not impact open space in these ways. I ask that you take a hard look at how these spaces are already impacted. According to the City of Portland's S2HC Frequently Asked Questions page, "Informal camping remains prohibited, but this prohibition has not been strictly enforced during the COVID-19 emergency. It is unkind to direct campers to leave parks, sidewalks, and roadsides unless there is another place they can safely shelter." It is unkind to the broader public to not be allowed to use our collective open spaces for the sake of temporary shelters. Furthermore, due to your lack of willingness to regulate and enforce already non-allowable uses within open space zoning a precedence has been established indicating the City will not be capable of enforcing the 180-day rule. Please preserve the intent of the open space zoning, which went through significant public process already; not bend the rules to pretend to solve an issue.

Testimony is presented without formatting.