

Allen W. Ratcliffe, Ph.D.
Volunteer Community Advocate
1424 N. Winnifred Street
Tacoma, WA 98406-2736
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Metropolitan Park District Board of Commissioners,

Gentleones,

I believe that proposed regulation 8.27.210, a blanket prohibition against erecting defined structures unless specifically authorized by the Parks Director conflicts with recent Federal Court and Federal District Court rulings re Martin v City of Boise.

Those Court decisions establish the right of homeless persons to sleep on public property when no other shelter is available and prohibit punishment of homeless persons for sleeping outside when no adequate alternatives exist. As I read them (and I am not an attorney) your proposed rules appear to violate both holdings.

My first objection is to the blanket prohibitions contained within your proposed rules. I urge you to consider establishing rules that clearly define public park spaces upon which homeless persons may erect temporary structures and camp. For example:

In which specific parks will temporary structures and overnight camping be permitted?

Within what portions of each specific park, and for how many days?

During what hours will temporary structures and camping be permitted in those parks?

How many temporary structures and how many persons may occupy the temporary structures

at any given time?

What restroom facilities will the Park District provide in those specific parks for use by homeless

people?

My second concern is to the removal of homeless persons' belongings without provision for safe storage, for informing them where and for how long their belongings will be held, and about what procedure must be followed to regain possession of held belongings.

Third, I note throughout the proposed rules exclusive focus on prohibition and punishment of persons found camping in public park properties. No attention is given to linking homeless persons with homeless outreach teams or other appropriate source of services that might enable them to find safe and healthy alternatives to camping on public park property.

Finally, since Federal Courts have established these rights and a disproportionate number of homeless persons are also persons of color, issues of equity and of human rights violations may be of concern.

Thank you for considering these comments.