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Subject: Listening House opposition to amendments to day shelters ordinance

To the St. Paul City Council:

As a service provider and operator of a day shelter providing critical services to vulnerable people in need, Listening House is highly grateful for the forthcoming ordinance amending chapters 65 and 66 of the Legislative Code pertaining to homeless services facilities, making more spaces like these possible citywide to meet the need in our community.

I write today to offer feedback and requests from a service provider perspective on the proposed amendments to the ordinance posted this week. We welcome a dialogue, and I greatly appreciate your attention to these matters so that the intention of the ordinance, and our shared work together, can be fulfilled.

Prince Amendment: "In the event a local emergency is declared ... the facility may provide up to 10 beds for use during the declared emergency". **We strongly oppose this amendment as written**, which would preclude facilities like ours from offering beds for normal daytime use as part of the essential function of a day shelter. The assumption and potential impact of this statement is that an emergency must be "declared" before use of a bed can be authorized. As a day space, we have beds available for individuals who need/want to sleep during day hours when overnight shelters are not open, and by default do not offer overnight beds. It is essential that day services be able to offer space for rest and sleeping at all times, not just during declared emergencies. For example, many of our guests work jobs overnight and need a safe place to sleep during the day - Listening House is one of the only places they can do that. Others are simply exhausted from the experience of being homeless and not having access to consistent or regular food, sleeping space, warmth, dry clothes, hygiene/shower facilities and more for days, and the ability to offer daytime beds to them as part of a day shelter is a necessity of basic health. Should we offer overnight beds, it would be only in a declared emergency, in accordance with existing established procedures and law. Example: This past winter during the cold snap, Freedom House was available for overflow from other women's shelters in St. Paul. We sheltered 3-6 women each night of the declared cold weather emergency. Not being able to offer beds at all at a day shelter, though, is a core violation of the very function of spaces like ours. **We would oppose the amendment as written and ask Councilmembers to vote no.**

Alternatively, if the intention of the amendment is simply to specify when and where the day shelters can offer *overnight* beds, or another purpose, **we request time to discuss these scenarios with the Council** so as to avoid unintended impacts on our ability to serve people.

Noecker Amendment: "Security Plan for the facility shall be developed and submitted to the zoning administrator for approval": Listening House is highly concerned by the potential for this amendment to perpetuate unjust segregation through zoning, as well as the inequitable strains it places on day shelters that are not imposed on other organizations like bars, restaurants and similar entities in neighborhoods. For example, under the current vague language, a future CUP process could require 24-hour security even though a day shelter only operates 8-12 hours a day, functionally preventing the shelter from operating at all. **We would oppose this amendment as written and ask Councilmembers to vote no.**

Listening House is committed to meeting necessary and reasonable security needs for the wellbeing of

the day shelter, guests and nearby neighborhoods involved. We ask CMs reject this amendment as written as it does not build on lessons learned about partnerships in neighborhoods that contribute to safety of all involved.

Listening House has learned a lot about effective neighborhood partnerships and security plans that ensure guests and neighbors alike are well-served by the facility. We attend regular meetings of the SPPD Central District, engage with the neighborhood district council and local business community/association to address issues whenever they arise and prevent future issues from occurring. We also work with a volunteer network of neighbors who care about the facility, know the guests there, and help foster a positive community presence in the immediate area through personal relationships and greater communication. Lastly, we have raised significant funds for security costs, which supplement SPPD's responsive presence to our site.

The cost of security measures are great and should not impede an organization from being able to deliver their service. Participation and cooperation with local law enforcement and neighborhood councils – yes, this is done now and makes sense. An amendment to ensure the housed are “safe” from the unhoused via an unclear, expensive or unreasonable “security plan” – this is wrong. We ask that the Council oppose this amendment so that the criminalization of people in deep poverty and the unsheltered is not further perpetuated by the letter of the law or by people participating in CUP processes. Zoning is a key factor to segregation, and the proposed ordinance overall is taking a step to combat that legacy. Amendments of this kind run the risk of undercutting that purpose, and exacerbating the status quo.

More broadly, we must bring to your attention that the experiences Listening House has had in securing space to deliver essential services to the St. Paul community have often mirrored the double standards or different sets of rules imposed on the people who experience homelessness themselves. Rules are often based on perception or bias instead of the facts and realities at hand of people in need. Rules created by housed people, intended to continue pushing unhoused people further away. I am asking that you as the City Council acknowledge this dynamic in the policy process, and make it easier to help people in the most need, not harder.

We hope and believe that the above clarifications will still meet the intent of the ordinance while improving it for everyone's success. I greatly appreciate your attention to this feedback.

Thank you,

Molly Jalma  
Executive Director, Listening House of St. Paul