



City Attorney's Office

April 18, 2025

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Re: Proposed Changes to City Public Camping Laws

Mr. Maynard,

I have now had an opportunity to review your April 15, 2025 letter and proposed changes to VMC 8.22.040.

As your client knows, the City of Vancouver (the “City”) has invested substantial time and resources into building a homelessness response strategy and system that is not only legally sound, but operationally practical, ethically responsible, and evidence-based. The policies in place today—and those actively being implemented—are the result of years of planning, public input, and collaboration across departments, service providers, and community stakeholders. The City has informed Clark County Matters (“CCM”) about these efforts and the very real logistical, capacity, and legal constraints that shape them. Your clients’ claims and oversimplified “fixes” ignore the work already being done.

The solution to people living outdoors is not more or stronger laws—it is having more indoor places for people to live. An “equal or greater commitment to preventing and discouraging public camping,” particularly by way of enforcement is meaningless without available alternatives to public camping. Your statement is more accurate if written in reverse — “Without an equal or greater commitment to more shelters, services and affordable housing, Vancouver’s efforts to prevent and discourage public camping to end unsheltered homelessness will be unsuccessful.”

The City does not currently have the shelter or housing capacity needed to bring everyone indoors, even if it were to attempt to utilize enforcement to do so. Nor does

the City have enforcement capacity (officers or jail space) to effectively eliminate citywide unsheltered homelessness, especially without the additional shelter and housing resources it actively continues to pursue.

Many of the changes you propose to VMC 8.22.040 duplicate efforts already in place and laws already in existence, exceed what can be reasonably enforced, or are counterproductive because they undermine the very strategies that help people transition out of homelessness. For example, your proposed 1000-foot exclusion zones would effectively ban camping citywide—a strategy that is not only infeasible to enforce, but would also undermine outreach and engagement efforts by pushing people farther out of sight and reach, which also creates safety issues for the individuals themselves. Your suggestion to extend the daily camping prohibition to begin at 4:30 a.m. would result in widespread sleep deprivation among unsheltered individuals, interfere with access to services, and further erode their ability to stabilize. None of these outcomes are aligned with the City's goals or values—or with basic standards of human dignity. They also arguably violate Washington Supreme Court ruling *Hands v. Hansen*, 2025 Wash. Lexis 206 (April 17, 2025).

The strategies you propose are either already in place in a more practical form or have been reviewed and deemed unworkable for reasons outlined above. The City will continue to increase capacity to meet the critical needs and advance a comprehensive, trauma-informed homelessness response strategy grounded in shelter, housing, outreach, and responsible enforcement.

Please let me know if you have any questions. Thank you.



Nena Cook | City Attorney



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