

MID-WILLAMETTE HOMELESS INITIATIVE- PANHANDLING CASE STUDY

February 28, 2019

Policy Question

Should the MWHI recommend an ordinance or program(s) to reduce panhandling in the region?

Background

The Mid-Willamette Homeless Initiative (MWHI) is a collaborative effort among the cities of Independence, Monmouth, Salem, and Keizer and Marion County. The initiative's purpose is to identify and launch proven strategies that will reduce homelessness in the region. The strategic plan recommends re-engaging the City of Salem's *Give Hope, Not Money* program, including implementation of a collection system similar to that of Salt Lake City's *Real Change* program or the City of Albuquerque's *311* program, providing a way to divert money that would be given to panhandlers to programs that can provide to those experiencing homelessness with wraparound services. The coordinator's work plan includes this topic as a project designed to research ways to reduce panhandling and identify alternatives for implementation.

Approaches to Address Panhandling

Three research-based approaches were identified below to reduce panhandling: (1) Program-Based Alternatives; (2) Giving Alternatives, Paired with Educational Campaign; and (3) Regulatory Approach.

(1) Program-Based Alternatives.

Program-based alternatives help those who are engaged in panhandling meet resource needs, such as daily work. Such programs build working relationships and connections with individuals that provide supportive services; e.g., housing, shelter, mental health, food, and rehabilitation services. These alternatives offer avenues for individuals to learn and build skills and create a current work history.

The cases identified are Portland, Maine *Opportunity Crew*; Albuquerque, New Mexico *There's a Better Way*; Cincinnati, Ohio *Generocity 513*; and Chicago, Illinois *A Day for Change*. The programs are all work-associated programs that provide pay and connective services.

Attachment 1 (pages 5-7) contains more details about these researched, program-based alternatives that work with homeless individuals to build working skills, education, and linkages to services, helping them become self-sufficient with housing and jobs.

There are several benefits from program-based alternatives. The programs link participants to services, giving them the opportunity to gain job skills, earn money, and offer the potential for future job placement. Companies can receive tax deductions for donations, gain advertisement, and support their communities.

Disadvantages include that programs are generally seasonal, running from spring to fall. These programs are funded by donations from local companies, nonprofits, or government funds. Also, it is difficult to measure whether program-based alternatives help reduce panhandling. There was a limited number of panhandler participants in the researched programs, and the data does not show if participants had

found employment, are still employed, whether participants have stable housing, or if they are continuing to panhandle.

(2) Giving Alternatives, Paired with Educational Campaigns.

A giving alternative offers people who are giving cash to panhandlers a different way of helping. These programs are text-and-give services, retrofitted parking meters, online donations, and sponsorships. Giving alternatives are generally coupled with an education component that either focuses on the availability of alternative forums to give or on the advisability of giving to those who panhandle. Money that may have been given directly to panhandlers is diverted to service providers or community-based services that aid those experiencing homelessness, assuming those who are panhandling are homeless.

Researched giving alternative programs that were identified are Atlanta, Georgia *Stop Panhandling*; Palo Alto, California *Downtown Streets Team*; and Salem, Maine *Change It*. These programs are associated with giving to services, work opportunities, housing programs, education, rehabilitation programs, and ways to donate campaigns.

Attachment 2 (pages 8-9) describes giving alternative programs that focus on re-educating the public to donate to local services, rather than donate cash to a homeless individual. The funds generated for local services help homeless individuals become self-sufficient by providing work opportunities, housing programs, education, and outreach programs.

The program uses technology, like texting, to reach the younger generation for donating to programs, instead of giving handouts to panhandlers. That couples with “special savings” to local businesses in the area. However, the elderly population might not use or have texting ability. Also, if there are limited “special savings,” it could discourage people from donating.

(3) Regulatory Approach.

A regulatory approach would be accomplished by an ordinance focusing on prohibiting panhandling. Many cities prohibit panhandling in certain places, such as near ATMs, or regulate the manner of panhandling, such as prohibiting aggressive panhandling. According to American Civil Liberties Union (ACLU), 61 cities in Oregon have ordinances restricting panhandling or begging in some way. There are eleven cities that have total bans. Four cities have bans on aggressive solicitation. Three cities have limitations on time and place, restricting panhandling during certain hours or in certain areas.

Many ordinances prohibiting the act of panhandling have been challenged as unconstitutional. Some communities have thus pivoted to regulating the exchange of money from vehicle to person. Seven Oregon cities prohibit drivers and passengers of vehicles from giving money or other tangible personal property to pedestrians while on a highway, road, or street.

The following Oregon cities and towns received letters from the ACLU of Oregon, which identified as problematic their anti-panhandling ordinances: Adams, Albany, Ashland, Bandon, Banks, Bay City, Brookings, Carlton, Cave Junction, Central Point, Chiloquin, Columbia City, Coos Bay, Corvallis, Cottage Grove, Culver, Dallas, Enterprise, Garibaldi, Gold Beach, Grants Pass, Happy Valley, Harrisburg, Hubbard, Jacksonville, Jefferson, Klamath Falls, Lafayette, Lake Oswego, Lebanon, Lincoln City, Malin, Manzanita, Medford, Mill City, Milton-Freewater, Newberg, North Bend, Nyssa, Pendleton, Philomath, Phoenix,

Pilot Rock, Prineville, Rainer, Rogue River, Roseburg, Seaside, Sheridan, Silverton, Stayton, Sutherlin, Umatilla (city), Union (city), Waldport, Warrenton, and Willamina.

Bill Monahan, general counsel to the Mid-Willamette Valley Council of Governments, provided a legal opinion that local governments should not attempt to craft anti-panhandling ordinances. According to Mr. Monahan, it has been proven to be nearly impossible to create an ordinance structured to address a “compelling state interest” that will stand up to legal challenge.

Attachment 3 (pages 10-11) contains the Mr. Monahan’s legal opinion on anti-panhandling ordinances.

Attachment 4 (page 12) provides greater detail about the Oregon cities that have passed panhandling bans or restrictions.

Staff Recommendation

Staff recommends the jurisdictions consider the most effective approaches to address the reduction of panhandling. While work opportunity programs affect a limited number of homeless individuals, in smaller jurisdictions, these programs may have greater impact. Larger jurisdictions may want to consider education campaigns for a broader reach. Staff does not recommend the jurisdictions craft anti-panhandling ordinances, per the advice of legal counsel.

Options for jurisdictions to explore include the following.

- 1. Work Opportunities.** Work programs give a set number of individuals the opportunity to build skills, work experience, and make money, rather than panhandling.

Option 1

Set up a business-sponsored program, run by a nonprofit, that offers panhandlers the opportunity to earn money by cleaning up public areas, such as parks. The program would require a supervisor, transportation, lunches, and minimum wage payments for up to four hours per day for the participants. Business sponsors would need to cover the estimated \$1,500 per week in costs for six participants working a four hour shift three days per week.

Option 2

Fund and implement a city-operated work program, similar to the one described above. Costs would increase to \$1,700 per week, because of higher supervision costs. The city may also want to refer clients to shelter, employment, behavioral health services, job preparedness training, healthcare screenings, hygiene care, and interim housing through relationships with area nonprofits. Ideally, the program would be operated by the city’s Public Works Department.

- 2. Giving Alternatives, Paired with Education Campaigns.** Giving alternatives offer people who are giving cash to panhandlers a different way of helping; e.g., text-and-give services, retrofitted parking meters, online donations, and sponsorships.

Option 1

Sponsor a nonprofit to create a text-and-give service. A text-and-give service is where individuals can text in donations using a phone application. Once the funds are transferred, the donor receives discounts, coupons, or incentives from local businesses. Proceeds go to identified community homeless programs.

Costs would include purchasing a text-and-give app, public outreach or marketing, and nonprofit staff time to oversee the program and to generate business sponsorships. Text-and-give software like Mgive, Rally4, and Snowball are designed for nonprofits, requiring small charges per donation or monthly charges, depending on the selected service option. Marketing budgets will vary, depending on the size of community and availability of free or earned media. Outreach could also drive potential donors to a website that takes online donations.

Option 2

Set up parking meters for donations to designated community homeless programs. Meters are placed around hot spots in town that accept coins or credit cards for donations. Meters would be painted to match the nonprofit recipient of donations and be easily identified. The estimated cost for five IPS "Smart Meters" is \$4,000, including the meters and services. (Note: The City of Salem Downtown Solutions Task Force considered this option and did not recommend it.)

Attachment 1- Program-Based Alternatives

Portland, Maine *Opportunity Crew*; Albuquerque, New Mexico *There's a Better Way*; Cincinnati, Ohio *Generosity 513*; and Chicago, Illinois *A Day for Change*

Portland, Maine *Opportunity Crew*¹

In 2017, Portland, Maine offered an *Opportunity Crew* pilot program in connection with their local social services program. The program had an outreach of 64 clients for the opportunity crew. Seventeen clients participated in the program. Participants collected more than 310 bags of trash and worked 287 hours in just 51 days. Out of the 17 participants, 5 found employment.

The City of Portland now works with their Social Services Division and the city's Parks Division to run an opportunity crew program. The program requires a van and staff to coordinate the work crew. Breakfast, lunch, and water are provided. A local business can hire or sponsor the Opportunity Crew for one week for \$1,300. The tax-deductible sponsorship includes advertising at the clean-up site and publicity from the city. The *Opportunity Crew* is a 36-week program offering panhandlers the opportunity to earn money by cleaning up local parks and public areas and linking them with needed services, such as job training and support. Participants are paid \$10.90 an hour (minimum wage), for up to six hours per day, for up to ten participants. Participants are taken to a social services office at the end of their shifts for payment and to link them to services.

Opportunity Crew is a more hands-on approach that gives panhandlers the opportunity to become self-sufficient. This program requires marketing to businesses in the area and advertising on social media, radio, or news.

Albuquerque, New Mexico: *There's a Better Way*²

This work program pairs a day of work, including transportation, with community education and the opportunity for a day's wages. A city-donated van provides transportation. Wages are \$9 per hour, and the program also provides lunch, snacks, and water. During its first year, clients cumulatively earned \$50,000; 302 homeless individuals worked more than 932 day-long shifts; 112 individuals sought health and substance abuse treatment; and 9 individuals were placed in permanent supportive housing. For 2017, Albuquerque had budgeted \$181,000 for *There's a Better Way*.

Program goals are: (1) give people dignity in work; (2) connect individuals with services; and (3) promote collective impact to end panhandling. The program was started in phases. The first phase was signs for panhandlers to connect them to the information. A website, shelters, and service providers posted links for program donations, explaining the difference between donating and panhandling. The next phase was the purchase of a new vehicle with graphics *There's a Better Way! Help End Panhandling Call 311* and a website link for donations. The program's initial budget was \$50,000.

The city's Solid Waste Department drives to areas frequented by panhandlers and offers panhandlers day labor, such as landscape beautification and garbage removal. After their work day, passengers are transported back to the local hope center for the homeless for shelter, if needed. Since 2015, the crews have cleaned 894 city blocks and collected 256,741 pounds of waste. At the end of the workday, the workers receive their pay from the local hope center and are connected with other resources based on their needs.

¹ <https://www.portlandmaine.gov/1989/Portland-Opportunity-Crew>

² <https://www.cabq.gov/family/services/homeless-services/theres-a-better-way>

The program has seen a variety of accomplishments: 1,575 unduplicated people have worked in this program; 422 workers have pursued permanent employment information; 76 of those workers have gained permanent employment positions; 355 have received mental health and/or substance abuse services; and 21 households have been placed into stable housing.

Cincinnati, Ohio *GeneroCity 513*³

GeneroCity 513 is an initiative aimed at helping individuals who have been driven to panhandling, including those facing unfortunate circumstances like homelessness, addiction, and mental illness. Using a multi-faceted approach, *GeneroCity 513* offers positive alternatives to panhandling, helps connect panhandlers to social service agencies, and provides strategic case management to the most visible homeless persons in downtown Cincinnati. The initiative's programs include a jobs van, outreach workers, and donation stations.

The jobs van operates four days per week, picking up individuals each day and transporting them to a job site for a day of work. The jobs van also helps connect panhandlers to social service agencies for shelter, employment, and mental health and substance abuse services. Participants engage in community beautification efforts and are provided a free lunch during their shift. At the conclusion of their shifts, participants are paid \$9 per hour in cash for their labor and are dropped off downtown between 3 and 4 pm.

The program statistics covering 50 days in operation are: 255 miles cleaned, 1,906 bags of trash collected, 487 jobs van riders, and 71 riders referred to other resources. The program partners with Greater Cincinnati Behavioral Health Services. The *GeneroCity 513* program employs two outreach workers who aid individuals on the street, regardless of their location, mental state, sobriety or housing situation. The *GeneroCity 513* outreach workers supplement the outreach work being done by GCBHS' PATH Team and Downtown Cincinnati Inc.'s Social Services Outreach Coordinators.

The program's website keeps their services and data up-to-date and easy to find. The program has no barriers to whom they help in the homeless population. The program goes to the homeless population, instead of homeless individuals locating them. However, the program has a limited number of workers (ten individuals) and runs only Tuesday through Thursday from 10-3 pm.

Chicago, Illinois *A Day for Change*⁴

A Day for Change works with [A Save Haven Foundation](http://www.asafehaven.org/)⁵ offering panhandlers and homeless individuals a chance to work a five-hour shift consisting of manual labor, such as shoveling snow or picking up trash, for a cash payment of about \$55. The pilot program was designed to reach 100 people. The mayor's office said it reached 225 people in its first three months for a total payout of \$12,000 to \$15,000. The city announced allocated funds totaling \$540,000 toward expanding the initiative. The yearlong *A Day for A Change* program aims to help more than 550 people who are struggling with housing and economic stability.

Two work vans do daily work recruitment at viaducts and underpasses, where a concentrated population of homeless individuals and panhandlers reside. Program participants are eligible to earn up

³ <https://www.generocity513.org/>

⁴ <https://chicagotonight.wttw.com/2017/03/15/chicago-expands-day-change-homeless-program>

⁵ <http://www.asafehaven.org/founders-letter>

to \$600 annually and receive meals, transportation, behavioral health services, job preparedness training, healthcare screenings, hygiene care, and interim housing.

A Save Haven Foundation is a large contributor to this program. It is a networking system for the homelessness community in the city. The populations served are individual adults, including veterans and non-violent reentry clients; families with children; and youth. The program also includes individualized case management, shelter, food, treatment, education, job training, access to employment, and access to affordable housing.

A Day for Change aligns with other innovative city investments to reduce homelessness, such as a surcharge on the house sharing industry, making Chicago among the first municipalities to leverage a dedicated funding source for homelessness; participation in the national Ending Veterans Homelessness Initiative campaign housing more than 3,000 homeless veterans; and the creation of the Citywide Task Force to Reduce Homelessness, charged with addressing chronic homelessness citywide.

Attachment 2- Giving Alternatives, Paired with Educational Campaigns.

Cases identified are Atlanta, Georgia *Stop Panhandling*; Palo Alto, California *Downtown Streets Team*; and Salem, Massachusetts *Change It*.

Atlanta, Georgia *Stop Panhandling*⁶

In 2015, Atlanta Downtown Improvement District hired a Social Impact Director who focused on leading and convening stakeholders to understand quality of life issues. The district has been instrumental in supporting social service organizations that work downtown to reduce poverty. Initiatives resulted, such as cold weather relief for people experiencing homelessness during the winter; a partnership with Lyft to help people with transportation needs move from the street to a shelter and from shelter to housing; and partnerships with area hotels to bring people experiencing extreme poverty into hospitality employment.

The district established a coordinated access point to enroll people experiencing homelessness. A diversion initiative was set up to divert arrests of people experiencing homelessness or extreme poverty into treatment. In addition, the district created a comprehensive plan to end incarceration for people experiencing mental illness and participated in an annual homelessness count and a Homelessness Continuum of Care ten-year strategic plan. The Home First program was developed, a \$50 million initiative to establish 1,000 units of permanently-supportive housing and other services for people experiencing homelessness.

The district is campaigning to *give change that makes sense*. It stated, “Asking for money is illegal anytime in Downtown Atlanta, and after dark throughout the city.” “The more you give change to panhandlers, the more their lives don’t change. ... A donation of \$100 can provide one week of transitional housing with intensive professional services for someone in need.”

Palo Alto, California *Downtown Streets Team*⁷

The Downtown Street Team, a nonprofit program located in San Rafael, California, campaigns to redirect residents’ generosity through a meter-based donation program to reduce panhandling in the community. Instead, “Put Your Change to Work” donates to get people off the street and back to work. This program uses a purple meter that is installed throughout downtown and accepts both coins and credit cards for donations. Tax donation receipts are available for online donations. The webpage also provides statistics on homelessness, prevention, and actual cost to the city for homeless efforts.

The street team and local businesses work together to reduce the impact of panhandling on downtown businesses. Businesses can also sponsor a *Change to Work* meter ranging in price per year with a two-year, tax-deductible commitment to support efforts in reducing panhandling.

Street team members are panhandlers and homeless volunteers that clean up the streets and discourage loitering, panhandling, and disorderly conduct in the community. Each member receives a case manager, pro-bono attorney, therapy services, and non-cash stipends. This program pulls them out of the mindset of survival mode and into goal setting mode. Since 2016-17, team members removed

⁶ <https://www.atlantadowntown.com/adid/areas-of-focus/social-impact>

⁷ <http://streetsteam.org/pyctw>

more than 3,000 tons of debris from urban waterways. They cleaned homeless encampments, removing trash daily, and successfully recruited encampment residents to become team members.

The program has employed 811 team members for 90 days or more, averaging nine employment placements per month; 91% of graduates keep their jobs for 90 days or more; graduates have earned more than \$905,000 in taxable income, and the average hourly wage is \$13.12. The program has helped house 848 people, 614 being team members, averaging eight people housed per month.

Salem, Massachusetts *Change It*⁸

Change It donors can text SALEM to 50555 and donate \$5, with a dual goal of raising donations for new programs and decreasing the amount raised by panhandling. In addition, donors receive special savings to local shops and eateries.

This program encourages donors to “text to give.” These proceeds go to support the city’s Collaborative Hope homelessness initiative. The key highlights of this program are to obtain new homeless outreach workers, police patrols, and additional supportive services for the homeless. The goal is a *Housing First* program that moves individuals permanently into housing and off the street.

⁸ <https://www.salem.com/mayors-office/pages/change-it>

Attachment 3- Bill Monahan, Council of Governments General Counsel Legal Opinion on Anti-Panhandling Ordinances

To: Homeless Initiative Program Coordinator

From: Bill Monahan, General Counsel

Re: Legal Opinion on Anti-Panhandling Ordinances

Date: October 23, 2018

You have provided me with background information that you compiled while studying what various communities in Oregon and elsewhere are doing to address the issue of panhandling. Some of the information reports on programs structured to create jobs for homeless individuals to offer alternatives other than panhandling. One objective of these programs is to provide citizens with opportunities to give funds to help individuals, presumably so the act of panhandling will not be necessary. Other materials are focused on ordinances passed to curb the act of panhandling through issuance of citations.

I have reviewed the materials as well as articles, cases, and letters regarding anti-panhandling ordinances that have been put into effect in various cities. From the research provided, as well as research I have performed and recently received at a continuing legal education session, my conclusion is that any city considering enacting new regulations to regulate panhandling will have a very difficult task creating regulations that pass constitutional scrutiny. Any city considering undertaking such an effort should carefully consider whether initiating an effort at this time is appropriate.

Anti-panhandling ordinances have been struck down consistently in federal courts as the constitutional test to create a restriction that does not discriminate on the basis of content or that is narrowly tailored to further a compelling state interest is extremely, if not impossible, to meet. Ordinances have been found to be in violation if their purpose is for safety and welfare, to keep streets or sidewalks clear for the public to pass, or to remove panhandlers to be out of sight or away from business centers, religious or other institutions. Anti-panhandling laws on their face have been found to impose restrictions on solicitation that do not exist for other types of speech.

For these reasons, it is my opinion that local governments should not attempt to craft an anti-panhandling ordinance. It has been proven to be nearly impossible to create an ordinance structured to address a "compelling state interest" that will stand up to legal challenge. Constitutional legal scholars consider this test to be the most demanding test in constitutional law.

As you requested, I took into consideration the ordinance adopted in 2007 by the City of Roseburg which makes unlawful the transfer of any money or tangible personal property from a driver or passenger in a vehicle on a highway, road or street in Roseburg to a pedestrian. This ordinance, adopted as Roseburg Ordinance No. 3275, makes any person found violating the ordinance to be guilty of committing a traffic violation punishable by a fine not to exceed \$75. While Roseburg continues to enforce this ordinance (although it is not clear how often it is used and whether it is consistently applied), and your research shows at least seven other Oregon cities have adopted similar ordinances, it is not advisable that additional cities do so in 2018. Cities such as Bend evaluated the ordinance and chose not to follow the example after identifying the difficulty associated with providing consistent and fair enforcement. I agree with Bend's city attorney's assessment of the enforcement issues.

The Roseburg approach, in my opinion, is suspect, particularly in light of recent action taken by the American Civil Liberties Union (ACLU) of Oregon. In August, the ACLU, along with the National Law Center on Homelessness & Poverty, engaged in a concerted effort to raise awareness among cities and the general population to repeal laws it considers to be bad policy. ACLU of Oregon sent a letter to 61 Oregon cities it identified as having objectionable laws in a campaign to cause the repeal of anti-panhandling laws. As one would imagine, the ACLU asserted such laws will not stand up to constitutional scrutiny.

The ACLU has essentially put cities on notice that those cities that enforce anti-panhandling ordinances, rather than merely keep them in place as deterrents, will be exposed to legal action. In the past, in the *Volkar v City of Medford* case, the ACLU successfully challenged Medford's code that restricted solicitation of donations. Thus, it is likely prepared to apply resources to challenge the laws of other communities. Whichever community becomes the focus of ACLU action is likely to find the need to apply significant legal effort and community financial resources to defend its laws. Such challenges are often accompanied with public relations campaigns aimed at identifying a community as one that ignores citizen rights or lacks compassion. Negative publicity and notoriety sometime linger in a community after it has been engaged in contentious litigation. The ACLU might welcome an opportunity to make an example of a community that moves forward to consider a new ordinance following the issuance of their letter.

I should note that some cities in Oregon have ordinances fashioned to create civil exclusion zones or enhanced law enforcement zones. While not anti-panhandling in form, they have potential to be used to exclude someone who is both homeless and was issued a series of citations in a defined area of a city. The city attorneys of Medford and Ashland recently took part in a legal issues discussion in which they expressed confidence that their ordinances along these lines differ from the facts and ruling of the recently decided *Martin v Boise* case. In the *Martin* case, the U.S. Court of Appeals for the Ninth Circuit ruled that the City of Boise, Idaho could not cite homeless individuals for sleeping in public places on nights when beds for homeless were not available in the community. These cities plan to continue to enforce their ordinances. Our member jurisdictions may be aware of the laws in these communities and ask whether they can be adopted for their use. These laws are among those the ACLU has identified as being bad policy but may be enforceable for their limited purpose.

Attachment 4- Regulatory Approach

- 11 cities have total bans
 - o Seaside Municipal Code 131.21
 - o Warrenton Municipal Code 9.04.22
 - o North Bend Municipal Code 9.04.050
 - o Klamath Falls Municipal Code 5.242
 - o Cottage Grove Municipal Code 9.20.020
 - o Junction City Municipal Code 9.05.150
 - o Lincoln City Municipal Code 9.08.040
 - o Stayton Municipal Code 9.20.020
 - o Salem Municipal Code 95.060 Reserved
 - o Dallas Municipal Code 5.280
 - o Milton-Freewater Municipal Code 8-1-2-10
- 4 cities have bans on aggressive solicitation
 - o Wilsonville Municipal Code 10.310
 - o Brookings Municipal Code 9.10.345
 - o Medford Municipal Code 5.258 (Volkart v. City of Medford)
 - o Lebanon Municipal Code 9.30 and 9.35 (2016)
- 3 cities have limitation on time and place (restriction of panhandling during certain hours or areas)
 - o Wilsonville Municipal Code 10.310
 - o Ashland Municipal Code 10.130 (2016)
 - o Lebanon Municipal Code 9.30 (2016)

Prohibiting the act of panhandling has generally been challenged as unconstitutional; some communities have pivoted to regulating the exchange of money from vehicle to person

- 7 Oregon cities have implemented laws prohibiting drivers and passengers of vehicles from giving money or other tangible personal property to pedestrian while on highway, road, or street. Some also prohibit a pedestrian from accepting money or goods.
 - o Coos Bay Municipal Code 10.28.020 (2014)
 - o Brookings Municipal Code 10.20.145 (2016)
 - o Sutherlin Municipal Code 10.12.140 (2012)
 - o Central Point Municipal Code 12.20.025 (2012)
 - o Medford Municipal Code 6.360 (last amended 2011)
 - o Grants Pass Municipal Code 6.22.010
 - o Lebanon Municipal Code 9.35 (2016)
- Other Cases identified:
 - o Roseburg Municipal Code 8.02.150
 - o Springfield Code 6.112