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Devon Chaffee
Executive Director

January 12, 2023

VIA EMAIL (abeloin@ManchesterNH.gov)

Adrienne Beloin, MSW
Director of Homelessness Initiatives
City of Manchester
1528 Elm Street
Manchester, NH 03101

Re: Proposed January 17, 2023 Sweep of Encampment Containing Houseless Individuals

Dear Director Beloin:

Our respective organizations—including the National Homelessness Law Center¹ that litigated *Martin v. City of Boise*, 920 F.3d 584 (9th Cir. 2019)—are aware of the City’s Sunday, January 8, 2023 email in which the City informs certain members of the Manchester community that houseless individuals at the encampment at Pine and Manchester Streets will be “ask[ed] ... to vacate the area” and “must vacate themselves and their belongings by 12 AM [midnight] on Tuesday January 17th or they will be subject to citation.” This encampment may contain up to 50 individuals, and this eviction will effectively occur in the evening of the Martin Luther King, Jr. holiday. The City’s January 8, 2023 email states that Manchester “started the operation of the overnight warming station at the Cashin Senior Activity Center [‘Center’] this weekend” where the Center has “offered cots, charging stations, waters, and off site storage,” among other things. The Center’s use for this purpose began on Friday, January 6, 2023.² This follows the Tuesday, January 3, 2023 meeting of the Board of Mayor and Aldermen in which some in Manchester, including business owners, complained about the presence of houseless individuals in the City.³

We have reviewed the eviction proposal and “warming station” made available by the City, including touring both the encampment and Center on January 10, 2023 and interviewing those directly impacted. For the reasons explained below, we ask that City officials postpone this eviction until a more permanent solution is established and to allow time for the City to consider the legal issues presented here. As you know, the community to be evicted is among the most marginalized in New Hampshire, with many suffering from mental illness and substance use disorder.

In sum, we do not feel that there is a need for the City to follow a rushed eviction process and arbitrary time frame, especially when the City has no immediate answer to the obvious question that will stem from this eviction—namely, where will these people go? The recent agreement to use the Tirrell House as a homeless shelter will only

¹ The Law Center is the national legal advocacy organization dedicated solely to ending and preventing homelessness. We have over 30 years of experience in policy advocacy, public education, and impact litigation. Since 2006, the Law Center has tracked laws criminalizing homelessness in 187 cities across the country, and we have documented the failures and costs of those policies in numerous national reports, including [Housing Not Handcuffs 2019: Ending the Criminalization of Homelessness in U.S. Cities](#) (2019). We have also published best practices, model policies, and case studies from across the country on how to constructively address homeless encampments. See [Tent City, USA: The Growth of America’s Homeless Encampments, and How Communities are Responding](#) (2018). The Law Center’s reports demonstrate that laws like the Proposed Ordinance do not address the underlying causes of homelessness, and instead injure homeless persons’ rights and waste taxpayer resources.

² There is also a warming station at 1269 Café at 465 Union Street that can accommodate 53 people and is open in evenings, but where no beds are provided.

³ See Andrew Sylvia, “Tensions rise at Aldermanic meeting over homelessness on Manchester Street,” [Manchesterinklink.com](https://manchesterinklink.com/tensions-rise-at-bma-over-homelessness-on-manchester-street/) (Jan. 3, 2023), <https://manchesterinklink.com/tensions-rise-at-bma-over-homelessness-on-manchester-street/>

house women, and there has been no date formally established for its opening.⁴ Given the absence of such a plan to immediately house and relocate these individuals in a sustainable and humane way, we hope that the City will postpone this eviction—an eviction that will only perpetuate a costly cycle of “chasing” the houseless from place to place⁵, and will only further ostracize, stigmatize, and endanger the safety of this community. Given the imminence of the eviction at midnight when Tuesday, January 17, 2023 begins, we ask for a commitment to postpone this eviction by Friday, January 13 at 10:00 a.m., which would allow us to seek judicial relief if appropriate.

I. This Proposed Eviction Should Not Occur.

Respectfully, we believe that this proposed eviction is inhumane, especially given the admitted lack of sustainable and permanent options for this community. Capacity at the Families in Transition (“FIT”) Adult Emergency Shelter is approximately 138 beds and, most nights, that shelter is full.⁶ We interviewed one person on January 10, 2023 who was unable to get a bed at FIT for four days in a row. It has also been reported that two women seeking shelter there were recently turned away because the two open beds were designated for men. As the City itself has acknowledged, this houseless population has nowhere else to go on a sustainable basis for 24 hours per day, 7 days per week. The Cashin Senior Activity Center is only a temporary warming center, and it is only open from 7:00 p.m. to 6:00 a.m. And those using the Center apparently cannot bring their property into the Center beyond what can fit in a small bag, with the only current option provided being off-site storage for other possessions according to the City’s January 8, 2023 email. And the Center effectively evicts this houseless population at 6:00 a.m.—*which is one hour before it was originally scheduled to close as a warming shelter⁷ and is about the coldest time of the day.* “Wake up” occurs at approximately 5:00 a.m., and the bus leaves from the Center at approximately 5:45 a.m.

The City has been candid about the lack of community-based and long-term resources for this houseless population. Mayor Craig has stated in a joint letter with several other mayors that “New Hampshire’s systems of care for individuals experiencing or at-risk of homelessness are not meeting the needs of communities across the state and are contributing to a statewide homelessness crisis.”⁸ Similarly, the Emergency Operations Center’s January 8, 2023 press release acknowledges that it is continuing “to seek suitable space for a 24/7 emergency shelter, due to the lack of capacity at state-funded shelters across New Hampshire.” Chief Aldenberg has also noted that there is no current solution to permanently addressing the needs of this population on a 24-hour basis, stating on Monday,

⁴ See Paul Feely, “Agreement reached to use Tirrell House as women’s homeless shelter,” *Union Leader* (Jan. 12, 2023), https://www.unionleader.com/news/politics/agreement-reached-to-use-tirrell-house-as-womens-homeless-shelter/article_de858132-4207-58bf-9ac6-03994325c272.html.

⁵ See Rudy Perez, “Homeless Encampment Sweeps May Be Draining Your City’s Budget,” *Housing Matters* (Jan. 4, 2023), <https://housingmatters.urban.org/feature/homeless-encampment-sweeps-may-be-draining-your-citys-budget>, (“Sweeps reduce the visibility of homelessness, but evidence shows they only further displace unhoused people and do not address its root causes. Sweeps exacerbate negative outcomes for people experiencing homelessness while straining city budgets.”).

⁶ See Carol Robidoux, “Gimme shelter: As emergency shelter beds are prepared, how did we get here and what’s next?,” Manchesterinklink.com (Jan. 6, 2023), <https://manchesterinklink.com/gimme-shelter-as-emergency-shelter-beds-are-prepared-how-did-we-get-here-and-whats-next/>.

⁷ See Paul Feeley, “City Hall: Plan to use Cashin Center as shelter unveiled, safety concerns aired,” *Union Leader* (Jan. 7, 2023), https://www.unionleader.com/news/politics/city_hall/city-hall-plan-to-use-cashin-center-as-shelter-unveiled-safety-concerns-aired/article_a9090fd7-e6a9-537c-99b1-d9b6f32a67f6.html (“City officials announced later Wednesday the Cashin Center would open as a shelter from 7 p.m. to 7 a.m. two days later.”).

⁸ See Carol Robidoux, “Craig joins with other NH mayors calling on Sununu, statewide officials for action on homelessness crisis,” Manchesterinklink.com (Jan. 3, 2023), <https://manchesterinklink.com/craig-joins-with-other-nh-mayors-calling-on-sununu-statewide-officials-to-solve-homelessness-crisis/>.

January 9, 2023 that “the question becomes, where are they going to go? That’s for the folks in the outreach community to figure out That’s the complicated part.”⁹

In the absence of answers to these critical and unresolved questions, this eviction should not occur, especially where it would be occurring in the middle of winter in one of the coldest months of the year. As Mayor Craig stated in response to the State’s eviction of individuals from state courthouse property in Manchester in November 2020: “This action from the State is inhumane, causing trauma to individuals with nowhere else to go.”¹⁰ The Mayor added that the clearing there was an “injustice.”¹¹ The same is true here, especially where the City itself has partially contributed to this problem. For example, the City took steps in 2021 to further ostracize houseless individuals by preventing camping in City parks after the State’s eviction of houseless individuals at the Superior Courthouse in November 2020¹²—steps that left many in this population to use the very sidewalks at issue here outside FIT.

Furthermore, though this eviction is apparently occurring because of “growing safety concerns” according to the City’s January 8, 2023 email, this eviction does not actually address any such public safety concerns. Indeed, the City’s current eviction decision is part of a pattern of continuously evicting houseless individuals—the Superior Courthouse in November 2020¹³, the Amoskeag campsite in February 2021¹⁴, the Firestone campsite in April 2021¹⁵, parks after the enactment of a 2021 ordinance, etc.—only to have encampments later materialize because the systemic problems leading to houseless remain unaddressed. The City’s proposed eviction will only exacerbate public safety concerns by simply moving these unaddressed concerns to other parts of the City, including parts of the City that will be less visible and less accessible to public safety officials. Pushing this population out further will only hinder the ability of health officials to monitor and track this population and, where appropriate, administer care. The City could

⁹ See Paul Feely, “As notices to vacate Manchester encampment posted, dozens meet to discuss city’s homeless crisis,” *Union Leader* (Jan. 9, 2023), https://www.unionleader.com/news/social_issues/as-notices-to-vacate-manchester-encampment-posted-dozens-meet-to-discuss-citys-homeless-crisis/article_8f05393a-7c72-5186-bff9-4a55fe3118a4.html?block_id=1120512.

¹⁰ See Asher Klein and Katherine Underwood, “NH Evicts Homeless From Encampment at Manchester Courthouse,” *NECN* (Nov. 20, 2020), <https://www.necn.com/news/coronavirus/nh-evicts-homeless-from-encampment-at-manchester-courthouse/2354674/>.

¹¹ <https://twitter.com/MayorJoyceCraig/status/1329900086235713536>.

¹² See Andrew Silvia, “Aldermen discuss public camping ordinance,” (Jan. 4, 2021), <https://manchesterinklink.com/aldermen-discuss-homeless-camping-ordinance/>. The City has also amended this ordinance to ban shopping carts. See Andrew Sylvia, “Aldermen ban shopping carts, multiple bicycles, in city parks,” *Manchesterinklink.com* (Oct. 18, 2022), <https://manchesterinklink.com/aldermen-ban-shopping-carts-multiple-bicycles-in-city-parks/>.

¹³ See Carol Robidoux, “Gimme shelter: As emergency shelter beds are prepared, how did we get here and what’s next?,” *Manchesterinklink.com* (Jan. 6, 2023), <https://manchesterinklink.com/gimme-shelter-as-emergency-shelter-beds-are-prepared-how-did-we-get-here-and-whats-next/> (“In November of 2019, a large encampment of people took over the state-owned Hillsborough County Superior Courthouse lawn. They were dispersed by NH State Police without any provisions for alternative care. About 15 of those were transported to respite beds in Derry. Within a month nearly all of those people were back on the streets. Those few who were left to figure out a plan were told the state-funded respite was ending on Dec. 31 and they had to go.”).

¹⁴ See Josie Albertson-Grove, “City clears homeless camp under Amoskeag Bridge following fire,” *Union Leader* (Feb. 6, 2021), https://www.unionleader.com/news/social_issues/city-clears-homeless-camp-under-amoskeag-bridge-following-fire/article_d85116af-7745-5d39-a9d8-358f6226daf2.html.

¹⁵ See Mark Hayward, “Homeless camp adjacent to Firestone to be cleared Thursday,” *Union Leader* (Apr. 9, 2021), https://www.unionleader.com/news/homes/homeless-camp-adjacent-to-firestone-to-be-cleared-thursday/article_1dea2912-26e6-5864-b14c-85e24b1658c5.html.

also help facilitate public safety by providing trash bins and toilets, but it has, to date, declined to do so even in the face of requests.¹⁶

II. The Eviction and Its Scope Likely is Unlawful.

Apart of from the inappropriateness of this proposed eviction, the eviction notice raises several legal concerns that the City should evaluate further before it takes action.

First, the Cashin Senior Activity Center is not an “available overnight shelter” as defined under Section 130.13(B) of Manchester’s City Ordinances addressing camping in public places—one of the statutes relied upon in the Notice to Vacate. Thus, the existence of the Center does not justify both the City’s prohibition on camping in this area and the City’s proposed eviction. Under the ordinance, an “available overnight shelter” shall “mean that the person can, at the time of citation, *go to a local homeless shelter*, that said shelter has an available overnight space for the individual at no charge to the person, that said available overnight space will be available to that person upon their arrival and that the person is not barred for any reason including but not limited to bail conditions, protective orders, trespass orders, rules of the shelter, policies of the shelter, intoxication or impairment from going to the local homeless shelter.” (emphasis added).

Here, the Center is not “a local homeless shelter.” As the City’s January 8, 2023 email states, the Center is only an “overnight warming station” and is “meant to be a temporary relief due to the emergency of safety and cold weather.” Further, both the Emergency Operations Center and the Mayor have described the Center a “warming center” or “warming station”¹⁷ in their respective January 8, 2023 press releases.

The Center’s “warming station” function is fundamentally different from a traditional “homeless shelter,” as the Center’s “warming station” is not permanent, but rather is a “short-term, limited duration, no-services facility that becomes operational when temperatures or a combination of precipitation, wind chill and temperatures become dangerous.”¹⁸ Indeed, the Center’s station only provides sheets and economy “cots” that lack mattresses in a communal space. This is clear from the pictures below:

¹⁶ See Andrew Sylvia, “Tensions rise at Aldermanic meeting over homelessness on Manchester Street,” Manchesterinklink.com (Jan. 3, 2023), <https://manchesterinklink.com/tensions-rise-at-bma-over-homelessness-on-manchester-street/> (“In response to concerns from others regarding litter and feces, he said that porta-potties and sharps boxes would solve the problem “tomorrow” and provide evidence to those on the street that action will be taken to address the problem.”); Andrew Sylvia, “Tensions rise at Aldermanic meeting over homelessness on Manchester Street,” Manchesterinklink.com (Jan. 3, 2023), <https://manchesterinklink.com/tensions-rise-at-bma-over-homelessness-on-manchester-street/> (“In response to concerns from others regarding litter and feces, he said that porta-potties and sharps boxes would solve the problem ‘tomorrow’ and provide evidence to those on the street that action will be taken to address the problem.”); Mark Hayward, “Mark Hayward’s City Matters: Winter is coming. Is the city ready to take care of the homeless?,” Union Leader (Dec. 4, 2022), https://www.unionleader.com/voices/city_matters/mark-haywards-city-matters-winter-is-coming-is-the-city-ready-to-take-care-of/article_86886236-d5c7-5344-a4cc-dd054453cf34.html (“But the biggest unmet necessity? ‘Public toilets. That’s the biggest problem right now,’ Higgins said The FIT homeless shelter also won’t allow the homeless living outside their doors to use the bathroom, Savard confirmed.”).

¹⁷ <https://www.manchesternh.gov/Government/Mayor-and-Aldermen/Mayors-Office/Press-Room>.

¹⁸ See Paul Feeley, “City Hall: City to operate warming station at Cashin Senior Activity Center,” *Union Leader* (Oct. 16, 2022), <https://finance.yahoo.com/news/city-hall-city-operate-warming-081100384.html>.



The Center also does not serve meals, but only “snacks” and “juice” according to the January 8, 2023 email. And it does not appear that individuals can store possessions in the Center beyond what can be provided in a small tote bag. Nor does the Center meet the definition of “emergency shelter” in He-M 314.02(a) and He-M 1007.02(e), which is defined as “any facility, *the primary purpose of which is to provide temporary shelter for homeless individuals or families,*” excluding transitional housing. Here, the Center’s “primary purpose” is obviously not “to provide temporary shelter,” but rather to provide activities for seniors.¹⁹ In any event, an “emergency shelter” defined under these rules must provide under He-M 314.02(d) the following: “a. Adequate bedding and mattress; b. Basic food at no cost to the guest; c. Soap and hot water for personal hygiene; and d. First aid.” Again, we know the Center does not fit this definition because it does not provide adequate bedding (and instead only offers an economy cot without any mattress), does not provide meals (and instead only provides “snacks”), and does not provide shower facilities

¹⁹ <https://www.manchesternh.gov/Departments/Senior-Services/William-B-Cashin-Senior-Activity-Center>.

for bathing. Under He-M 314.05(g), an “emergency shelter” must also not “exclude guests *for any part of the day*, from October 1 through April 30, unless reasonable arrangements are made for guests to use an alternative indoor site which is available for guests’ use while the shelter is closed.” (emphasis added). The Center, given its limited hours, does not meet this definition.

This usage of the Center is in stark contrast to FIT’s Adult Emergency Shelter, which is an obvious “homeless shelter” under Section 130.13(B) and is subject to the provisions of He-M 314. FIT, for example, offers, residents “hot showers, a bed each night, nutritious meals, and day programming.”²⁰ At this shelter, residents “can connect with a case manager who will help them access local resources they can utilize for housing, job training and placement, and other services, including healthcare through Health Care for the Homeless (HCH) Program of Manchester at Catholic Medical Center, located on-site.”²¹

Second, even if the Center’s warming center constitutes an “available overnight shelter” under Section 130.13(B) (and it does not), the eviction cannot occur under the ordinance because the Center is not open during the full time in which camping would be banned. Section (A) of this Ordinance states that: “It shall be unlawful for any person to use or cause to be used any of the streets, sidewalks, square or any other public place, excepting parks as governed by Chapter 96, as a camping place absent prior written permission from the Board of Mayor and Aldermen or its designee.”²² The prohibited “camping” is limited to “the use of public property as a temporary or permanent place of dwelling, lodging or residence, or as a living accommodation ***at any time between sunset and sunrise as defined on the date of offense by the official government record***, or as a sojourn that has not been authorized by the Board of Mayor and Aldermen or its designee.” (emphasis added). Thus, on January 17, 2023, camping becomes prohibited under the ordinance at approximately 4:39 p.m. (sunset) and it is prohibited until 7:13 a.m. the next day (sunrise)—an over 14-hour window. However, the Center is only open for 11 hours, and is not open from 4:39 p.m. to 7:00 p.m. and from 6:00 a.m. to 7:13 a.m. the next day—times when camping is prohibited. During these time windows, this population has nowhere to go, as not even the Center’s warming station is available.

Third—even if the Center constitutes an “available overnight shelter” that allows the City, in its discretion, to ban camping on public property under Section 130.13 (again, it does not)—the City’s January 8, 2023 email stating that “[a]ll residents in the encampment must vacate themselves and their belongings” is overbroad and exceeds the scope of the ordinance. “Camping” is only banned “between sunset and sunrise,” and thus camping is *explicitly allowed* between sunrise and sunset. For example, on January 17, 2023, camping would still be permitted under the ordinance from 7:13 a.m. (sunrise) to approximately 4:39 p.m. (sunset). However, the City’s January 8, 2023 email, in overbroad fashion, appears to seek to prevent camping in this area *at all times of day*. But the ordinance does not impose a prohibition on camping for a 24-hour period.

Fourth, the eviction order is overbroad in another way. Even during the times in which camping may be banned from sunset to sunrise (again, assuming the Center’s warming station is “a local homeless shelter,” which it is not), only defined “camping” would be banned under Section 130.13. Yet the City’s January 8, 2023 eviction order appears to sweep individuals off this public property even if they are not camping. For example, the posted “Notice to Vacate” states that “[a]ll persons” must leave this space—apparently even if they are sitting, sleeping, or simply existing without any indicia of “camping.” The City’s January 8, 2023 email similarly states that these residents must “vacate the area” “and must vacate themselves and their belongings.” But there is no authority in

²⁰ <https://www.fitnh.org/services/emergency-homeless-services/shelter/>.

²¹ *Id.*

²² At outset, even if the ordinance could be applied, it allows the Board of Mayor and Aldermen or its designee to allow such camping—something it is apparently electing not to do despite the concerns raised above in Section I.

Section 130.13 for such a sweeping prohibition that goes beyond “camping.” Of course, people have a First Amendment right to occupy public spaces, including sidewalks, so long as they are not preventing others from also accessing the sidewalk. They should not and cannot be “moved along” for using this public space. *See City of Chicago v. Morales*, 527 U.S. 41 (1999) (on vagueness grounds, striking down ordinance that prohibited criminal street gang members from loitering in a public place and that allowed a police officer to order persons to disperse if the officer observed any person loitering that the officer reasonably believed to be a gang member).

Fifth, independent of any statutory authority cited, we believe that this proposed eviction violates the constitutional rule set forth in *Martin v. City of Boise*, 920 F.3d 584 (9th Cir. 2019). There, the Ninth Circuit held that two city ordinances—a disorderly conduct ordinance and a camping ordinance, which criminalized sleeping outside on public property, whether bare or with a blanket or other basic bedding—violated the Eighth Amendment insofar as it imposed criminal sanctions against homeless individuals for sleeping outdoors on public property, when no alternative shelter was available. The City has appropriately relied on *Martin* in the past in declining to evict people from this encampment.²³ As noted in *Martin*, “as long as there is no option of sleeping indoors, the government cannot criminalize indigent, homeless people for sleeping outdoors, on public property, on the false premise they had a choice in the matter.” *Id.* at 617. Thus, the question under *Martin* is whether the Center’s overnight warming station constitutes “available beds” that provide the “option of sleeping indoors.” It does not, especially where the Center only offers economy cots that contain no mattresses, no shower facilities, and no meals and, thus, does not meet the criteria set forth in He-M 314.02(d) or He-M 314.05(g) for an “emergency shelter.” As a result, a temporary overnight “warming station” open from 7:00 p.m. to 6:00 a.m. is not the kind of “beds” that the *Martin* Court envisioned when it required the practical accessibility of shelter beds as a precondition for enforcing any laws criminalizing life-sustaining outdoor activities. To be sure, many congregate shelter facilities are also only open at night, but the Center’s “warming station” here only operates when temperatures become dangerous—a feature that distinguishes it from a typical congregate shelter that, while potentially only open for “sleeping,” is open every night like FIT.

Finally, in the event the City conducts a clearing, it cannot destroy the property belonging to any of these houseless individuals. *See, e.g., Pottinger v. Miami*, 810 F. Supp. 1551, 1559, 1570-73 (S.D. Fla. 1992) (“[A] homeless person’s personal property is generally all he owns; therefore . . . its value should not be discounted.”; “However, the City’s interest in having clean parks is outweighed by the more immediate interest of the plaintiffs in not having their personal belongings destroyed.”).

Given the seriousness of these legal issues, we respectfully ask that any eviction be delayed until they can be fully considered and until more permanent solutions are established. **Given the imminence of the eviction at midnight when Tuesday, January 17, 2023 begins, we ask for a commitment to postpone this eviction by Friday, January 13 at 10:00 a.m.** An immediate response is necessary given the eviction deadline set by the City and the fact that the courts are not open on the Monday, January 16, 2023 Martin Luther King Jr. holiday. Thank you for your consideration.

²³ *See* Andrew Sylvia, “Aldermen discuss safety outside homeless shelter,” Manchesterinklink.com (Dec. 21, 2022), <https://manchesterinklink.com/aldermen-discuss-safety-outside-homeless-shelter/> (during discussion of case, “Manchester Mayor Joyce Craig reminded the board that there is no available shelter space in the entire state, let alone Manchester”); Paul Feely, “City Hall: Plan to use Cashin Center as shelter unveiled, safety concerns aired,” *Union Leader* (Jan. 7, 2022), https://www.unionleader.com/news/politics/city_hall/city-hall-plan-to-use-cashin-center-as-shelter-unveiled-safety-concerns-aired/article_a9090fd7-e6a9-537c-99b1-d9b6f32a67f6.html (“Manchester Police Chief Allen Aldenberg said his officers “legally cannot go over there and kick people off the sidewalk without a lawful violation to do so,” citing a U.S. Ninth District Court of Appeals’ ruling in *Martin v. Boise*.”).



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Sincerely,

/s/ Gilles Bissonnette

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