February 1, 2023

Mayor Shlomo Danzinger, sdanzinger@townofsurfsidefl.gov
Vice Mayor Jeffrey Rose, jrose@townofsurfsidefl.gov
Commissioner Fred Landsman, flandsman@townofsurfsidefl.gov
Commissioner Marianne Meishcheid, mmeischeid@townofsurfsidefl.gov
Commissioner Nelly Velasquez, nvelasquez@townofsurfsidefl.gov

Via email

Dear Mayor Danzinger, Vice Mayor Rose, and Town of Surfside Commissioners:

We write on behalf of the National Homelessness Law Center ("Law Center"), the American Civil Liberties Union of Florida ("ACLU of Florida") and Southern Legal Counsel regarding the recently proposed legislation that would ban obstructing sidewalks and streets, sleeping or camping on the beach or other public property, showering with chemical substances or washing clothes on the beach street ends, panhandling, and urinating or defecating on public property.

We, along with local advocates and unhoused residents of your community, fear that any legislation emerging from the Mayor's memorandum[1], issued at the Special Town Commission Meeting on January 10, will unjustly and unconstitutionally punish people for existing in public spaces, even when they have no indoor alternative place to be. We urge you to reconsider drafting and passing such legislation unless and until the town of Surfside can identify practically accessible indoor locations where Surfside residents who are unsheltered can safely sleep and store their belongings, in line with Surfside's constitutional obligations.

Who We Are

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.

[1] Town of Surfside, Special Town Commission Meeting Agenda, available at 5949e3d2-7f99-11ed-9024-0050569183fa-3d1e888c-00c7-4e56-a2ef-6e32146a1b55-1672760539.pdf (d3n9y02raazwpg.cloudfront.net)

The ACLU of Florida is the Florida affiliate of the national American Civil Liberties Union, which works daily in courts, legislatures, and communities to defend and preserve the individual rights and liberties guaranteed to all people in this country by the Constitution and laws of the United States. The ACLU of Florida is a statewide, nonpartisan organization with more than 50,000 members in Florida dedicated to the principles of liberty and equality. ACLU-FL has a longstanding history of protecting those who are experiencing homelessness and those individuals' rights to engage in life-sustaining activity. *See McArdle v. City of Ocala*, 519 F.Supp.3d 1045 (M.D. Fla. 2021); *Stone v. City of Fort Lauderdale,* No. 0:17-cv-61211-WPD (S.D. Fla. 2017); *Pottinger v. City of Miami*, 810 F. Supp. 1551 (S.D. Fla. 1992).

Southern Legal Counsel ("SLC") is a Florida statewide not-for-profit public interest law firm that is committed to the ideals of equal justice for all and the attainment of basic human and civil rights. SLC primarily assists individuals and groups with public interest issues who otherwise would not have access to the justice system and whose cases may bring about systemic reform. SLC works proactively to ensure fairness, social justice and government accountability for Floridians through focused, high impact initiatives, policy advocacy and civil litigation. Since 2004, SLC's Decriminalizing Poverty Project has worked to protect the civil and human rights of persons experiencing homelessness. SLC is a founding organizational member of the national campaign "Housing Not Handcuffs" that advocates for constructive solutions to homelessness instead of criminalizing homeless people. SLC is a statewide leader in the civil legal aid system on legal issues faced by homeless individuals. SLC has successfully litigated cases statewide protecting the rights of homeless individuals, including many cases challenging laws restricting requests for charity and *McArdle v. City of Ocala*, 519 F.Supp.3d 1045 (M.D. Fla. 2021), which resulted in the Middle District of Florida holding that the City of Ocala's open lodging ordinance was an unconstitutional violation of the Eighth Amendment as it criminalized sleeping, sitting, and resting outside even when individuals did not have access to indoor shelter.

The Proposed Legislation Runs Afoul of Established Law

Proposed Bans on Sleeping and Camping on Public Property and Obstructing Sidewalks

In *Martin v. Boise*, the Ninth Circuit ruled that punishing a person experiencing homelessness for sitting, sleeping, or lying on public property in the absence of adequate alternatives constitutes cruel and unusual punishment under the Eighth Amendment. *Martin v. City of Boise*, 920 F.3d 584, 587 (9th Cir. 2019). Federal courts in the Eleventh Circuit have also recognized constitutional protections for individuals engaging in life-sustaining activities. In Florida, a federal court adopted the holding of *Martin* in *McArdle v. City of Ocala*, 519 F.Supp.3d 1045 (M.D. Fla. 2021), when the Middle District of Florida enjoined Ocala from enforcing its open lodging ordinance because the city did not have enough shelter space for its residents experiencing homelessness and law enforcement did not inquire into the availability of shelter space before enforcing the ordinance. In *Pottinger v. City of Miami*, the Southern District of Florida held that the City's "custom, practice and policy of arresting, harassing and otherwise interfering with homeless people for engaging in basic activities of daily life … in the public

places where they are forced to live" did not comply with constitutional commands. *Pottinger v. City of Miami*, 810 F. Supp. 1551, 1554 (S.D. Fla. 1992).

The Mayor's memorandum informing the drafting of the proposed legislation in Surfside suggests prohibiting "persons from congregating upon the sidewalks of the town so as to create an obstruction or hinder the passage of pedestrians" and states clearly that the "Town Code could be expanded further to address and prohibit activities or conduct that obstruct public sidewalks and rights-of-way, such as sitting, sleeping, lying, or loitering in a manner than inhibits the free, safe, convenient and normal use of public rights-of-way…"[2] The memorandum further suggests prohibiting "overnight sleeping and/or camping on public places, parks and the beach…"[3]

Given that sleeping, sitting, and lying down are considered life-sustaining activities under *Martin* and as reaffirmed in Florida in the *McArdle* case, and given that Surfside does not currently have sufficient indoor alternative locations at which residents can undertake these activities[4], the ordinances run afoul of the Eighth Amendment rulings in *Martin* and *McArdle.* The proposed legislation in Surfside is precisely the kind of policy that the *Pottinger* court condemned for its attempt to punish "homeless people for engaging in basic activities of daily life … in the public places where they are forced to live." *Pottinger v. City of Miami*, 810 F. Supp. at 1554.

Recently, the *Martin* ruling was reaffirmed. Grants Pass, Oregon maintained an ordinance much like the proposed legislation in Surfside that prohibited sleeping on any public sidewalks or streets, as well as camping on any public property. *Johnson v. City of Grants Pass*, 50 F.4th 787 (9th Cir. 2022). Under that ordinance, relying on any blanket or bedding to sleep anywhere in public would be prohibited. The City of Grants Pass argued that its anti-camping ordinances complied with *Martin* because they did not criminalize the act of sleeping, but instead prohibited sleeping in a campsite and the ordinances only imposed civil fines and not jail time. The Court found that the Grants Pass ordinances were unconstitutional under the Eighth Amendment "to the extent they prohibited homeless persons from 'taking necessary minimal measures to keep themselves warm and dry while sleeping when there are no alternative forms of shelter available.'" *Johnson*, 50 F.4th at 808." Indeed, Surfside's Acting Police Chief John Healy has publicly defended the proposed legislation, stating that "in Surfside, we don't run people out of town." But the *Grants Pass* ruling suggests that basic tolerance of unsheltered people does not preclude violations of the Eighth Amendment when the government is, as Surfside is attempting to do now, "punishing homeless people for taking necessary minimal measures to keep

[2] Town of Surfside, Special Town Commission Meeting Agenda, available at 5949e3d2-7f99-11ed-9024-0050569183fa-3d1e888c-00c7-4e56-a2ef-6e32146a1b55-1672760539.pdf (d3n9y02raazwpg.cloudfront.net)
[3] Ibid.
[4] Our research suggests that the only shelter facilities available for Surfside unsheltered residents are in the City of Miami, more than 5 miles away from the town of Surfside itself. Even in the event that Miami shelter beds are open and available to Surfside residents subject to enforcement of the proposed legislation, there is no practical way for those residents to access shelter, particularly without sacrificing their survival belongings and their access to communities and services in Surfside on which they rely.

themselves warm and dry when there are no alternative forms of shelter available."

Furthermore, although Surfside may not currently have an explicit practice of "run[ning] people out of town," the passage and enforcement of the proposed legislation would have the effect of displacing people from Surfside given that their unavoidable, life-sustaining conduct such as sitting, lying down, sleeping, and existing in public places would be criminalized.

Proposed Bans on Public Urination, Defecation, and Use of "Chemical Substances" While Showering

Sleeping, sitting, and lying down are not the only activities that constitute life-sustaining conduct: urination, defecation, and keeping oneself clean are also activities that all people *must* do in order to stay alive and healthy. Of course, doing such activities in private spaces is preferable given the public health concerns with undertaking such activities in public spaces and the dignity inherent in conducting such activities in private spaces. However, in the absence of adequate restroom facilities available to unsheltered Surfside residents, it is inhumane and counterproductive to criminalize these life-sustaining activities in public places, which effectively criminalizes these activities altogether. As Ron S. Hochbaum notes in a 2020 article for the North Carolina Law Review, "To criminalize public urination and defecation, while failing to provide access to bathrooms, suggests that homeless individuals' very existence is criminal."[5] As the Supreme Court has determined, criminalizing status, which is inherent in the criminalization of public urination and defecation without provision of access to bathrooms, is unconstitutional in violation of the Eighth Amendment. *Robinson v. California*, 370 U.S. 660 (1962).

Further criminalization of "showering … with chemical substances" and "washing of clothes" is equally concerning. Maintaining basic hygiene is on par with sitting, sleeping, lying down, urinating and defecating as a life-sustaining activity that should not be criminalized in public spaces in the absence of indoor alternatives; criminalizing the act of cleaning oneself or one's clothing not only *creates* many more public health problems than it solves, but it also, like the other provisions of this legislation, criminalizes unsheltered Surfside residents solely based on their status as unsheltered. Moreover, the maintenance of basic hygiene is integral to human dignity. Punishing residents for undertaking such a fundamental activity is cruel and inhumane.

Proposed Ban on "Aggressive and/or Obstructive Panhandling"

"Aggressive panhandling" ordinances have consistently been deemed by courts across the country to be unconstitutional violations of the First Amendment. The Supreme Court has repeatedly found the solicitation of donations to be protected speech under the First Amendment.[6]

[5] Ron S. Hochbaum, "Bathrooms as a Homeless Rights Issue," 98 N.C.L. REV. 205 (2020).

[6] *Williams-Yulee v. Fla. Bar*, 575 U.S. 433 (2015) (solicitation by candidate for office); *Int'l Soc. for Krishna Consciousness, Inc. v. Lee*, 505 U.S. 672, 677 (1992) (solicitation by religious organization); *United States v.*

The Supreme Court held in *McCullen v. Coakley*, 573 U.S. 464, 477 (2014) that, "The government's ability to restrict speech in [public for a] is very limited" and has held consistently that "streets, sidewalks, and parks are considered without more, to be public forums." *United States v. Grace*, 461 U.S. 171, 177 (1983). Federal courts have also consistently found that medians and public beaches constitute public forums for the purpose of First Amendment analysis. *See, e.g.*, *Cutting v. City of Portland*, 802 F.3d 79, 83 (1st Cir. 2015) (finding medians to be a public forum); *McCraw v. City of Oklahoma City*, 973 F.3d 1057 (10th Cir. 2020) (same); *Smith v. City of Fort Lauderdale*, 177 F.3d 954, 956 (11th Cir. 1999) (finding a public beach to be a public forum).

In addition to the fact that the areas in which Surfside hopes to restrict panhandling are likely to be public forums, the legislation is likely to trigger even more constitutional scrutiny because it will be content-based in nature. Since the landmark Supreme Court *Reed v. Gilbert* case in 2015, every panhandling ordinance challenged in federal court has either been found constitutionally deficient or has been repealed, including in recent lawsuits in Florida against two state statutes as well as lawsuits against the cities of West Palm Beach, Ocala, Lake Worth, Pensacola, Pompano Beach, and Fort Lauderdale.[7] *See Reed v. Town of Gilbert, Ariz.*, 135 S. Ct. 2218 (2015)*; see, e.g., Norton v. City of Springfield, Ill.*, 806 F.3d 411 (7th Cir. 2015); *Thayer v. City of Worcester*, 144 F. Supp. 3d 218, 238 (D. Mass. 2015); *McLaughlin v. City of Lowell*, 140 F.Supp.3d 177, 195 (D. Mass. 2015); *Rodgers v. Stachey*, 382 F. Supp. 3d 869 (W.D. Arkansas, 2019). Ordinances that prohibit or limit charitable solicitation or panhandling are content based restrictions on speech that are presumptively unconstitutional. See *Messina, et al. v. City of Fort Lauderdale*, *Fla.*, 546 F. Supp. 3d 1227, 1240 (S.D. Fla. 2021) ("[T]he law limits in-person, vocal solicitations for money or things of value. But it doesn't touch other topics of discussion. … As long as the speaker doesn't say something to the effect of 'I'm poor, please help' or 'Do you have some spare change?' he may approach a stranger anywhere in the City and utter any other message. Because the Panhandling Ordinance prohibits one topic and allows all others, it is content based.") (internal citations omitted). Courts use the most stringent standard – strict scrutiny – to review such restrictions. *Id*. at 1238.

The suggested legislation in Surfside aims to prohibit "panhandling, begging or solicitation throughout the Town,"[8] which undoubtedly restricts content-based, protected speech in public

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Kokinda, 497 U.S. 720, 738 (1990) (Kennedy, J., concurring) ("personal solicitations on postal property for the immediate payment of money" by volunteers for political party); *Riley v. Nat'l Fed'n of the Blind of N.C., Inc.*, 487 U.S. 781 (1988) (solicitation by charitable organization); *Sec'y of State of Md. v. Joseph H. Munson Co*., 467 U.S. 947, 968 (1984) (same); *Vill. of Schaumburg v. Citizens for a Better Env't*, 444 U.S. 620, 638 (1980) (same); *Cantwell v. Connecticut*, 310 U.S. 296, 307 (1940) (solicitation by religious proselytizer).

[7] *See* National Homelessness Law Center, "Housing Not Handcuffs Litigation Manual Supplement," available at homelesslaw.org/wp-content/uploads/2022/03/HNH_Supplement)to_Litigation_Manual.pdf ("favorable outcomes" includes findings of unconstitutionality, repeals of challenged laws, injunctive relief in favor of Plaintiffs, and/or settlement agreements).

[8] Town of Surfside, Special Town Commission Meeting Agenda, available at 5949e3d2-7f99-11ed-9024-0050569183fa-3d1e888c-00c7-4e56-a2ef-6e32146a1b55-1672760539.pdf (d3n9y02raazwpg.cloudfront.net)

fora. The language used in Mayor Danzinger's memorandum only loosely defines what would make protected solicitation rise to the level of "aggressive and/or obstructive," relying mostly on whether the intention of the person soliciting donations is to intimidate. Discerning the intention of the person soliciting donations is subjective and arbitrary, and the memorandum does not provide adequate notice of what is and is not prohibited. Moreover, the memorandum states that solicitation "can be extremely disturbing and disruptive to residents, visitors and businesses, impede access and enjoyment of public places and businesses, and may create a sense of fear, intimidation and disorder."[9] This language suggests that any solicitation, regardless of the manner or subjective intention of the person soliciting, could be presumed to be aggressive or obstructive.

"Aggressive panhandling" ordinances like the one proposed here always fail to meet strict scrutiny and thus have been uniformly deemed unconstitutional by courts nationwide. They "often sweep in much more speech than is necessary to promote public safety, including speech that is entirely innocuous." *Messina*, 546 F. Supp. 3d at 1240; *see also McLaughlin*, 140 F. Supp. 3d at 194, 195 (giving panhandlers only one opportunity to convey their message, without allowing follow up, was more restrictive than necessary). For example, often such ordinances prohibit continued solicitation after an initial request is turned down. However, there is nothing inherently dangerous about a follow up solicitation. *Messina*, 546 F. Supp. 3d at 1245. Additionally, aggressive panhandling provisions omit conduct that is genuinely threatening. *Id.* (these provisions "would apply to the batterer who first asked for pennies but not to the activist who, before the assault, asked the victim to join the Communist Party or the Ku Klux Klan").

Nor would such an ordinance be the least restrictive means of achieving Surfside's stated interests. Aggressive panhandling provisions that make conduct already punishable by criminal statutes subject to additional penalties because of its connection with protected speech fail the narrow tailoring requirement. See *McLaughlin*, 140 F. Supp. 3d at 193 ("The City may not deem criminal activity worse because it is conducted in combination with protected speech, and it certainly may not do so in order to send a message of public disapproval of that speech on content based grounds."); *see also Messina*, 546 F. Supp. 3d at 1245; *Thayer*, 144 F. Supp. 3d at 236-37; *Browne v. City of Grand Junction*, 136 F. Supp. 3d 1276, 1293-94 (D. Colo. 2015). Aggressive panhandling ordinances often include approaching a person in such a manner that the person is threatened with either imminent bodily injury, touching a solicited person without explicit permission, blocking a solicited person from passing, or intimidating, or compelling or forcing a solicited person to accede to demands. These activities already are punishable under existing state criminal laws and the City Code, which the City could enforce to address harmful conduct, including assault, battery and disorderly conduct. *See, e.g.*, §§ 784.03, 784.011, 877.03, Fla. Stat. (2021); *see also* Code of the Town of Surfside, Fla., § 54-1 (incorporating all misdemeanors under state law into the City Code). Panhandling ordinances that impose harsher penalties for panhandlers than for others who commit the same crimes do not constitute the least restrictive means of promoting public safety and thus fail constitutional challenges.

[9] Ibid.

The Proposed Ordinance Runs Counter to Federal Policy Guidance

Because people experiencing homelessness are not on the street by choice but because they lack choices, punishment serves no constructive purpose. As stated by the United States Department of Justice, "criminalizing homelessness is both unconstitutional and misguided public policy, leading to worse outcomes for people who are homeless and for their communities." *Bell v. Boise, et al.*, ECF 276, Case No. 1:09-cv-540-REB, Statement of Interest of the United States (D. Idaho. Aug. 6, 2015). Just like the camping bans in Grants Pass and Boise, Surfside's proposed legislation "creates a costly revolving door that circulates individuals experiencing homelessness from the street to the criminal justice system and back." *Id.* (quoting the U.S. Interagency Council on Homelessness). Policies that create criminal records because someone is homeless "create barriers to employment and participation in permanent, supportive housing programs." *Id.* Additionally, convictions can "also lead to lengthy jail sentences based on the ordinance violation itself, or the inability to pay fines and fees associated with the ordinance." Finally, "pursuing charges against individuals for sleeping in public imposes further burdens on scarce defender, judicial, and carceral resources." *Id.*

In addition, the Surfside legislation runs counter to guidance disseminated by federal agencies, including guidance released on June 7, 2021, by the CDC. *See* Interim Guidance on People Experiencing Unsheltered Homelessness, Ctrs. For Disease Control and Prevention, https://www.cdc.gov/coronavirus/2019-ncov/community/homeless-shelters/unsheltered-homelessness.html (last updated Feb. 10, 2022). The CDC guidelines state in part, "[i]f individual housing options are not available, **allow people who are living unsheltered or in encampments to remain where they are.** Clearing encampments, even if just for certain hours, can cause people to disperse throughout the community and break connections with service providers. This increases the potential for infectious disease spread." *Id.* As such, the CDC advises that communities should not clear any encampments unless and until they can provide individual housing units for those displaced. Specifically, the CDC states that "[e]ncampment disbursement should **only be conducted as part of a plan to rehouse people living in encampments,** developed in coordination with local homeless service providers and public health partners." *Id.* Otherwise, the CDC recommends that encampment residents be allowed to remain where they are and be provided with necessary sanitation facilities.

The U.S. Interagency Council on Homelessness ("USICH") also released guidance on June 15, 2022, that includes principles for addressing unsheltered homelessness.[10] The guidance specifically notes that approaches that use law enforcement to criminalize homelessness "Result in adverse health outcomes, exacerbate racial disparities, and create stress, loss of identification and belongings, and disconnection from much-needed services. While these efforts may have the

[10] USICH, "7 Principles for Addressing Encampments," June 2022, available at Principles_for_Addressing_Encampments.pdf (usich.gov).

short-term effect of clearing an encampment from public view, without connection to adequate shelter, housing, and supportive services, **they will not succeed.**" *Id.* Among other principles and suggestions, the guidance urges communities to engage encampment residents to develop solutions, conduct comprehensive and coordinated outreach, address basic needs of unhoused people and provide storage for personal belongings, ensure access to shelter, and develop pathways to permanent housing and supports. Surfside should focus its efforts on working with and supporting the Miami-Dade County Homeless Trust to implement the USICH's guidance.

Moreover, USICH released its Federal Strategic Plan to End Homelessness in December, which notes that "Many communities have made it illegal for people to sit or sleep in public outdoor spaces or have instituted public space design that makes it impossible for people to lie down or even sit in those spaces," and state clearly that "these 'out of sight, out of mind' policies can lead to lost belongings and identification which can set people back in their pathway to housing; breakdowns in connection with outreach teams, health care facilities, and housing providers; increased interactions with the criminal justice system; and significant traumatization – all of which can set people back in their pathway to housing and disrupt the work of ending homelessness."[11]

Enforcement of the Ordinances May Increase Fiscal Costs

If Surfside is interested in reducing costs, numerous studies have shown that communities save money by providing housing and services to those in need, rather than saddling them with fines, fees and arrest records and cycling them through expensive hospital and jail systems. *See* Housing Not Handcuffs Report. For example, Los Angeles spends over $100 million annually addressing homelessness, including $50 million annually policing criminal and civil anti-homeless laws.[12] This is not only expensive but exacerbates homelessness instead of solving it.

Though it may hide the costs in the law enforcement and jail budget, the Proposed Ordinance will incur significant costs for Surfside and its taxpayers—without solving the problem of homelessness. Further, because "[o]nce housed, people can more easily and effectively work toward resolving issues such as alcoholism, drug addiction, and mental illness," research shows that "[i]t costs far less for cities to invest in non-punitive alternatives that actually solve homelessness."[13] For example, the Economic Roundtable of Homelessness in Los Angeles found

[11] United States Interagency Council on Homelessness, "All In: The Federal Strategic Plan to Prevent and End Homelessness," available at www.usich.gov/All_In_The_Federal_Strategic_Plan_to_Prevent_and_End_Homelessness.pdf.
[12] *See* Homelessness and the City of Los Angeles, https://s3.documentcloud.org/documents/1906452/losangeleshomelessnessreport.pdf (2015).
[13] *See* Chris Herring et al., Pervasive Poverty: How the Criminalization of Poverty Perpetuates Homelessness, 67 Social Problems 131 (2019), https://static1.squarespace.com/static/5b391e9cda02bc79baffebb9/t/5cc1c0569140b7fb43b1af44/1556201561950/Pervasive+Penality+social+problems+(1)+(1).pdf.

that housing reduced average monthly spending by 41% per person, even after including the cost of providing housing. This savings included a 95% reduction in jail facilities and services costs.[14] If the Town's true interest is in public health, safety, and economic growth, it could make a much better investment by providing housing and services, rather than making it harder for people to exit homelessness due to criminal penalties and arrest records.

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We all wish to end homelessness in our communities—but the best, most cost-effective, and permanent way to achieve that is to ensure that all who are unsheltered can access adequate, alternative housing. We urge you to stop the drafting of the proposed legislation, and instead divert the funding that would be spent developing and enforcing the ordinance to investment in housing and services that would end homelessness in Surfside. We are happy to discuss this matter with you. Please feel free to contact us with any questions or concerns.

Sincerely,

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[14] *See* Daniel Fleming et al., Where We Sleep: Costs When Homeless and Housed in Los Angeles, https://economicrt.org/wp-content/uploads/2009/11/Where_We_Sleep_2009.pdf (2015).