

## **Coalition of Housing & Homeless Organizations (COHHO)**

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January 15, 2009

Grace Perry-Gaiter  
DCPL  
General Counsel  
Martin Luther King Jr. Memorial Library  
901 'G' Street, N.W., 4th Floor  
Washington, D.C. 20001

**Subject: Public Comments on Proposed Amendment of § 810 to Chapter 8, Title 19 of the D.C. Municipal Regulations**

Dear Ms. Perry-Gaiter:

Many of the member organizations of the Coalition of Housing & Homeless Organizations (COHHO) would like to express their concerns regarding the proposed amendment of §810 to Chapter 8, Title 19 of the D.C. Municipal Regulations. The proposed amendments will particularly negatively impact many of the people we serve.

We understand that District of Columbia Public Library's (DCPL) policy is to provide and maintain a safe and secure environment in which every customer can access information. Further, DCPL has stated its intention to develop these guidelines to ensure that its customers are free from harassment, abuse, harm, and undue stress when using its facilities. While DCPL likely does not intend to exclude certain customers through these amendments, COHHO members are concerned the new regulations will prevent many of the people we serve from accessing the public libraries.

Many people experiencing homelessness may need to access libraries during the day because of the District's severe shortage of day centers and 24-hour shelter facilities, a problem that has become even more acute since the closing of the Downtown DC BID Service Center. In addition, libraries provide much-needed life-improvement services to customers without homes; in particular, many people experiencing homelessness use the computers to maintain contact with service providers and to research job opportunities.

The three proposed amendments that raise particular concerns for COHHO members are the provision related to restrictions on the number of bags one may have in the library, the punitive measure related to sleeping in the library, and the punitive measure related to use of the bathrooms for washing.

The bag restrictions indicate that a person may have no more than one large and one personal bag, with the larger bag limited to 9 inches by 14 inches by 22 inches. Due to lack of public storage spaces and shortage of storage space at shelters, many people

experiencing homelessness must carry all of their earthly belongings with them at all times. As such, it is not practical to expect a person who has no place to store his or her belongings to fit everything he or she owns into a small carry-on size bag and a small personal bag. If the Proposed Rule is adopted intact that individual will be prevented from accessing public libraries.

In light of this, we ask that DCPL reconsider the bag configuration and number so a person with 4 or more bags that fit into the same area covered by a 9x14x22 bag be allowed to access library facilities. In addition, we also ask that the library consider installing lockers for people to use while in the library, if they have more bags than the allowed amount.

The provision restricting use of library bathrooms for bathing, shampooing, doing laundry, or changing clothes imposes a penalty of being banned from the library for 30 days for the first offense and 90 days for repeat offenses. Instead of imposing a 30-day ban, we request that a person receive a warning for the first offense, along with information about where one can get his or her personal hygiene needs met.

We are also concerned that the provision restricting sleeping in the library will be enforced in an uneven manner, with library personnel enforcing this restriction disproportionately against people who appear to be homeless.

We understand that DCPL is currently exploring ways to train its employees on issues of homelessness, and we certainly applaud those efforts and offer to assist. We encourage DCPL to implement mandatory trainings for its employees on these issues and to include resource and referral information. We also appreciate DCPL's exploring partnerships with local outreach providers. We encourage DCPL to use outreach workers as a first step when enforcing the library regulations. Calling on outreach workers will not only alleviate strain on library staff, but also help connect customers to needed services.

As DCPL moves forward with implementing any new regulations, we hope that DCPL will evaluate the enforcement of those regulations and will work with the community to ensure that customers are not being needlessly prevented from accessing libraries. We encourage DCPL to follow the best-practices approach of engaging people who are homeless to help meet their needs, so that all members of the public may enjoy what our public libraries have to offer.

Sincerely,

Coalition of Housing & Homeless Organizations

By:

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