



Date: September 13, 2023

Committee: Charles County Commissioners

Bill: Legislative Proposal 6: Air Conditioning

Position: Letter of Information

These comments are offered on behalf of the Maryland Multi-Housing Association (MMHA). MMHA is a professional trade association established in 1996, whose membership consists of owners and managers of more than 210,000 rental housing homes statewide. In Charles County alone, MMHA represents 12 companies with 22 apartment communities and 4,060 dwelling units. Our members house over 667,000 residents of the State of Maryland and 13,000 in Charles County. MMHA membership also includes more than 207 associate members that supply goods and services to the multi-housing industry. More information is available at <https://www.mmhaonline.org/>.

This legislative proposal would require all multi-family and single-family property owners to provide and maintain tenant-operated air conditioning service with a system that is capable of maintaining a temperature of no more than 70 degrees in each habitable space at a minimum height of 5 feet above floor level. For each property where cooling is not under the control of the tenant, the property owner must maintain a temperature of no more than 75 degrees Fahrenheit from May 1st to September 30th in each habitable space at a minimum height of above 5 feet above the floor. Habitable spaces include bathrooms, toilet rooms, and unit hallways. The bill would be effective 12 months after its passage.

This proposal will incur significant costs for housing providers throughout the county, further driving up the cost of rental housing. At a time when the County and the State have a dearth of affordable housing, this proposal will increase rents across the residential rental spectrum. For instance, one MMHA member reports that the recent installation of a ductless air conditioning system totaled nearly \$15,000 per unit, in a property with 219 units. In total, this upgrade cost about \$3,285,000. Larger projects that require potential ductwork, mounting, cages, and additional electrical upgrades would carry additional costs. None of these figures encapsulate preexisting operational expenses housing providers face. The question then, is not “if” rents will raise, it’s *by how much*.

One might argue that window units could provide a more cost and energy effective option for low-income renters, however, there is a concern about the ability to sufficiently cool every habitable space in the unit to standards prescribed by the bill, given that a window unit is only capable of cooling a limited square footage area.

Further, this proposal introduces one of the strictest air conditioning requirements in the State. In both Montgomery and Prince George's County, air conditioning is required beginning June 1st rather than May 1st. Both jurisdictions require the unit be cooled to 80 degrees. Lastly, Montgomery county's law provides the property owner with the opportunity to request delayed implementation for necessary upgrades for a period of up to 24 months.

MMHA appreciates the opportunity to raise these concerns with the Charles County Commissioners. MMHA asks that the Commissioners consider these issues during its deliberations.

For any additional information, please contact Chinelo Osakwe at cosakwe@mmhaonline.org.