



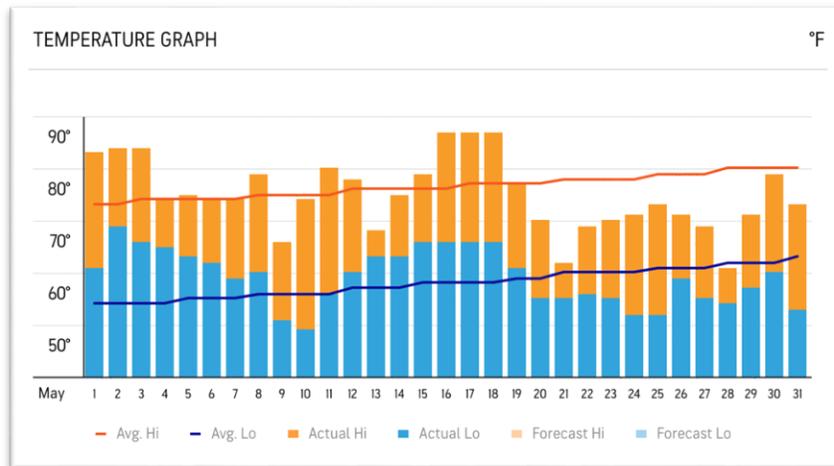
Statement on Council Bill 9-26, Rental Housing - Maintenance Standards and Essential Services - Air-Conditioning

March 10, 2026

The Apartment and Office Building Association (AOBA) of Metropolitan Washington is a non-profit trade association representing the owners and managers of more than 80,000 apartment rental units in Montgomery County. AOBA submits the following testimony in opposition to Council Bill 9-26.

This bill changes the required cooling start date from June 1 to May 15. AOBA opposes this change because many multifamily buildings operate with central plant heating and cooling systems that cannot instantly switch between modes. Transitioning a building from heating to cooling often requires several days and careful coordination by building engineers. Moving the cooling date earlier in the spring reduces operational flexibility and increases the likelihood that buildings will switch systems prematurely.

Additionally, weather patterns in the Washington, DC region do not support an earlier cooling requirement. According to AccuWeather data, daytime high temperatures in May are below 80°F for most of the month.¹



¹ <https://www.accuweather.com/en/us/washington/20006/may-weather/327659?year=2025>

While the occasional 80 day may be uncomfortable to some tenants, the actual unit temperature can vary significantly depending on building design, sun exposure, and individual unit conditions. A countywide earlier cooling date does not account for these building-specific factors.

In buildings with central plants, the earlier start date could also lead to more complaints. Given that tenants are typically away from home during the warmest part of the day and are more likely to be in their units during the evening hours, changing the cooling requirement will create a nightly comfort issue for tenants in central plant buildings that have made the switch from heating to cooling.

For these reasons, AOBA urges the Council to maintain the current June 1 cooling requirement and oppose Bill 9-26. For more information, please contact Brian Anleu at banleu@aoba-metro.org.