



www.legalaiddc.org
1331 H Street, NW
Suite 350
Washington, DC 20005
(202) 628-1161

**Testimony of Ashlei Schulz
Supervising Attorney, Housing Unit
Legal Aid of the District of Columbia**

**Before the Committee of the Whole
Council of the District of Columbia**

Public Hearing Regarding:

**Bill 26-285,
Climatizing Our Overheated Living Spaces Regulation Amendment Act of 2025
on
Tuesday, January 27, 2026, at 10:00 a.m.**

Legal Aid DC¹ submits the following testimony regarding Bill 26-285, Climatizing Our Overheated Living Spaces Regulation Amendment Act of 2025 (“COOL Spaces Regulation Amendment Act”). Legal Aid supports the Bill and encourages the Council to consider changes to 14 D.C.M.R §510.1 to advance the dates that air conditioning systems must be inspected and found operational.

Legal Aid’s Client Community Will Benefit From Extending Mandatory Air Conditioning Dates

As DC Summers Get Hotter, Low-Income Tenants Stand to Suffer Most

Lower-income tenants often live in aging buildings with poor ventilation. As recent reporting shows, DC temperatures can reach the high 80s and 90s well before May 15 and after September 15. Some residents have reported indoor temperatures of 80-90

¹ Legal Aid DC is the oldest and largest general civil legal services program in the District of Columbia. The largest part of our work is comprised of individual representation in housing, domestic violence/family, public benefits, and consumer law. We also work on immigration law matters and help individuals with the collateral consequences of their involvement with the criminal legal system. From the experiences of our clients, we identify opportunities for court and law reform, public policy advocacy, and systemic litigation. For more information, visit www.LegalAidDC.org.

degrees, which make apartments uncomfortable and unsafe.² Extending the time that landlords must provide air conditioning helps ensure that D.C.'s poorest residents are not forced to endure dangerous heat.

Extension of Mandatory Dates That Landlords Must Provide Air Conditioning Will Reduce Landlord-Tenant Conflicts

Members of our client community must repeatedly contact their landlords for relief during the spring and fall for relief from hot apartments. Extended mandated dates for air conditioning stand to reduce the number of these disputes and the need for emergency legal action. Instead of arguing the issue with landlords, tenants can rely on predictable obligations set by regulation.

Legal Aid's Client Community Will Benefit From Flexibility for Turning Over Two-Pipe Systems.

Many of our clients live in older buildings that utilize a "two-pipe" HVAC system that can either be set to heating or air conditioning (but cannot easily be toggled back and forth). Buildings with two-pipe HVAC systems were mostly built in the 1960s, and make up a substantial portion of the buildings that low-income residents can afford to live in.³

Two-pipe systems can take several days to change over, having the potential to leave tenants stuck with heat when they need cooling. Flexibility is necessary, especially given the temperature fluctuations we experience in D.C., to allow building managers to respond to real weather conditions and tenant feedback instead of fixed deadlines. The provision in the Bill that allows landlords to switch to heat anytime between October 1 and October 15, and air conditioning anytime between April 15 and May 1 allows managers to prioritize tenant comfort and safety during temperature fluctuations.

The Council Should Advance Deadlines for Inspection and Certification Under 14 D.C.M.R §510.1

² See "DC renters sweltering before apartment landlords switch to air conditioning" DC News Now, April 30, 2024. [DC renters sweltering before apartment landlords switch to air conditioning | DC News Now](#)

³ D.C. Department of Housing and Community Development, "Rental Accommodations Division Office of Administrative Hearings Rental Housing Commission," 2007, <https://dhcd.dc.gov/sites/default/files/dc/sites/dhcd/publication/attachments/RentControlFactSheet.pdf>

Consistent with our support for this Bill, Legal Aid also urges the Council to advance the dates by which owners must have their air-conditioning systems inspected and confirmed to be in working condition under 14 DCMR § 510.1.

A prior iteration of this legislation (Bill 25-279, COOL Spaces Act of 2023) proposed moving the required inspection date from May 1 to April 1 and moving the deadline for correcting defects from June 1 to May 1. Advancing these deadlines provides our client community assurance of a functioning air-conditioning system one month earlier than they receive now. This would help ensure that tenants are not left unprotected during the increasingly hot spring months. Also, it makes practical sense to require landlords to correct any defects no later than the date when air conditioning must be provided.

Conclusion

Legal Aid DC supports the COOL Spaces Regulation Amendment Act and urges the Council to strengthen it by advancing the deadlines for inspection and certification of airconditioning systems. Doing so will provide low-income tenants with earlier assurance of safe and comfortable housing, reduce unnecessary disputes about temperature, and ensure that building systems are fully operational before heat sets in. These changes will meaningfully improve comfort and health for Legal Aid's client community.-conditioning systems. Doing so will provide low-income tenants with earlier assurance of safe and