

JPC Testimony - SB757.pdf

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Position: FAV



THE SENATE OF MARYLAND
ANNAPOLIS, MARYLAND 21401

**Testimony of Senator Jill P. Carter
In Favor of SB757
- Baltimore City – Air Conditioning in Residential Rental Units –**

**Before the Judicial Proceedings Committee
On March 7, 2023**

Chair Smith, Vice-Chair Waldstreicher, and Members of the Committee:

- **SB757 requires landlords of residential units in Baltimore City to provide air conditioning between June 1 and September 30 if at least one (1) resident in the unit is age three (3) or younger or sixty-five (65) or older.**
- **Montgomery and Prince George’s Counties have similar, but more far-reaching laws. Their laws require air conditioning for all renters. This bill is limited to a smaller group of individuals; residents three (3) or younger or sixty-five (65) or older.**
- **In the past 5 years there have been 36 deaths and 5,400 emergency medical calls in Baltimore City due to heat-related illness (800 calls last year).**

- **In 2021, Baltimore City experienced above normal temperatures with 19 Code Red Extreme Heat days and 3 heat-related deaths.**
- **In summer months, urban air temperatures can be up to ten (10) degrees higher than the air of surrounding suburban or rural areas — a phenomenon known as the urban heat island (UHI) effect.**
- **Extreme heat events are getting worse with climate change. The urban heat island effect is anticipated to intensify as extreme heat events increase with climate change. Heat events will increase in severity and intensity, leading to a rise in daily temperatures.**
- **Estimates are that in 50 years, Baltimore weather will be similar to what Mississippi is experiencing today**
- **Approximately fifty-one percent (51%) of Baltimore’s households are renters, many of whom are young children and elderly. For these two (2) groups, air conditioning is essential.**
 - **In Baltimore City, 20% of children (about 24,000) have an asthma diagnosis, which is more than double the national prevalence of 9%.**
 - **Pediatric asthma-related emergency department visits occur in Baltimore at more than double the statewide rate.**
 - **According to the Maryland Health Services Cost Review Commission (HSCRC), in 2019, children in Baltimore City were hospitalized 389 times with asthma as the primary reason for admission. Children in Baltimore went to the emergency 3,457 times with asthma as the primary reason for the visit.**

- **Air condition systems filter out airborne allergens. Examples include dust mites, animal dander, pollen, and mold spores. They also work great for filtering non-allergic asthma triggers, such as smoke from wood fires, smoke from cigarettes, and various forms of air pollutants.**
 - **Air conditioning also reduces humidity in the home, which can trigger an asthma attack, and lower humidity reduces mold, pollen, dust mites from growing rapidly because they thrive in hot and humid conditions.**
 - **Extreme heat also poses the potential for increased mortality from cardiovascular disease, respiratory illness, and stroke, which heavily impacts the elderly**
- **The extreme summer heat also disproportionately impacts Black households, women-led households, and lower-income households. They make up the majority renters in Baltimore City.**

For these reasons, I respectfully request a favorable report on Senate Bill 757.

Sincerely,



Jill P. Carter, Esq.

Economic Action Maryland_SB757_FAV.pdf

Uploaded by: Michael Donnelly

Position: FAV



Testimony to the Senate Judicial Proceedings Committee
Senate Bill 757: Baltimore City – Air Conditioning in Residential Rental Units
Position: Favorable

March 7, 2023

The Honorable William C. Smith Jr., Chair
Senate Judicial Proceedings Committee
2 East, Senate Office Building
Annapolis, Maryland 21401
cc: Members, Judicial Proceedings Committee

Honorable Chair Smith and members of the Committee:

Economic Action Maryland is a nonprofit organization that works to advance economic justice and equity statewide through direct service, research, education, and advocacy. Our Tenant Advocacy Program serves renters and property owners in every Maryland county. We provide information and referrals if necessary so that clients with questions about the landlord-tenant relationship can better understand their rights and responsibilities and make best use of resources available to them.

We write in Support of Senate Bill 757.

Every year as temperatures rise, we start receiving complaints about a lack of air conditioning in rental housing – whether it was working and malfunctioned or if it was never present at all. When temperatures and humidity rise to unbearable, dangerous levels, renters contact us to see if there's something that can be done to get their air conditioning working. Too often, they're shocked and dismayed that generally, there are few options available to them.

Unfortunately, despite rent escrow's availability for lack of heat in the winter, air conditioning is not considered essential to life, health, and safety under Maryland's escrow law. Instead, lack of air conditioning is listed alongside cosmetic issues, with a presumption that it does not pose a serious threat to renters.¹ This inconsistency doesn't merely lead to discomfort – it's dangerous, particularly for older adults, young children, and people with a number of underlying health conditions.^{2 3 4}

¹ https://mgaleg.maryland.gov/2023RS/Statute_Web/grp/8-211.pdf

² <https://www.hsph.harvard.edu/news/hsph-in-the-news/the-dangers-of-extreme-heat/>

³ https://www.cdc.gov/climateandhealth/pubs/extreme-heat-final_508.pdf

⁴ <https://www.weather.gov/ffc/heat2>

The effects of extreme heat are exacerbated by the urban heat island effect. A lack of tree cover and green spaces causes higher temperatures than in surrounding areas. At night the hard surfaces in cities radiate the heat gathered through the day – meaning nighttime temperatures drop less than in surrounding areas.^{5 6} This means that people living in cities are exposed to higher temperatures with less relief at night. The burden of consistently excessive heat and humidity makes heat-related illnesses and complication even more likely. Further, demographic With some 51% of Baltimore households renting their homes, far too many people have no guarantee that their homes will protect them from hazardous summer heat.⁷

If enacted, House Bill 757 would protect some of the most vulnerable renters from extreme heat – older adults and young children.

This legislation is measured. Montgomery County already requires air conditioning in rental housing units if the building is not registered in the National Register of Historic Places.⁸ The bill requires climate control capable of cooling a unit to 80 degrees Fahrenheit. It does not require substantial renovations for central air conditioning in every unit – window units or ductless systems provide less expensive alternatives to ensure safe temperatures. Thus, the cost burden faced by property owners can be limited.

Further, it is clear that requiring air conditioning in these limited circumstances would increase electricity use during peak hours – it could increase greenhouse gas emissions making the problem worse. But this inconsistency is not inherent. With climate change upon us and predicted to weigh disproportionately on black and brown people as well as households with lower incomes, we cannot choose to sacrifice the most vulnerable to reduce emissions.⁹ There are other options. This legislation can pair with policies that reduce emissions broadly – individual households are not those deciding how electricity is generated. We can reduce emissions while also protecting those most vulnerable from the effects of climate change.

Senate Bill 757 would serve to protect older adults and young children from the dangerous and deadly effects of extreme heat. It is measured and it is focused to protect those most at risk. It helps resolve a dangerous inconsistency in State Law and will serve to protect life, health, and safety.

For these reasons we urge a favorable report.

Respectfully submitted,

Michael C. Donnelly

Economic Action Maryland

⁵ <https://www.epa.gov/heatislands>

⁶ <https://www.nature.com/articles/s41467-021-22799-5>

⁷ <https://www.rentcafe.com/average-rent-market-trends/us/md/baltimore-city/>

⁸ <https://www3.montgomerycountymd.gov/311/Solutions.aspx?SolutionId=1-6VX9W2>

⁹

<https://www.epa.gov/newsreleases/epa-report-shows-disproportionate-impacts-climate-change-socially-vulnerable>

Senate Bill 757 FWA Schrum.pdf

Uploaded by: Wesley Schrum

Position: FWA

Testimony in Favor of SB757 with Amendments

Baltimore City – Air Conditioning in Residential Rental Units
Before Judicial Proceedings Committee: March 7, 2023

Senate Bill 757 would require landlords to provide air conditioning in residential rental units in Baltimore City with residents that are 3 years of age or younger, or 65 years of age or older. This bill requires that air conditioning be provided between June 1 and September 30 of each year. It further requires that the temperature in the units can be no warmer than 80 degrees Fahrenheit if the landlord controls the air conditioning; if the tenant can control the system, the system must be kept in good working condition and able to sustain a temperature no warmer than 80 degrees Fahrenheit.

This testimony will describe the serious health effects that lack of air conditioning can have on all residents of a heat island area, especially the very young, older adults, and anyone with a preexisting health condition. It will then demonstrate the need for this bill by discussing the nearly insurmountable hurdle Maryland law places on tenants when trying to obtain air conditioning, and describe laws in other jurisdictions that require landlords to provide air conditioning. Finally, an amendment will be proposed to provide air conditioning to all tenants in Baltimore City.

The Rising Temperatures in Baltimore City have a Serious Impact on the Health of the Members in our Society

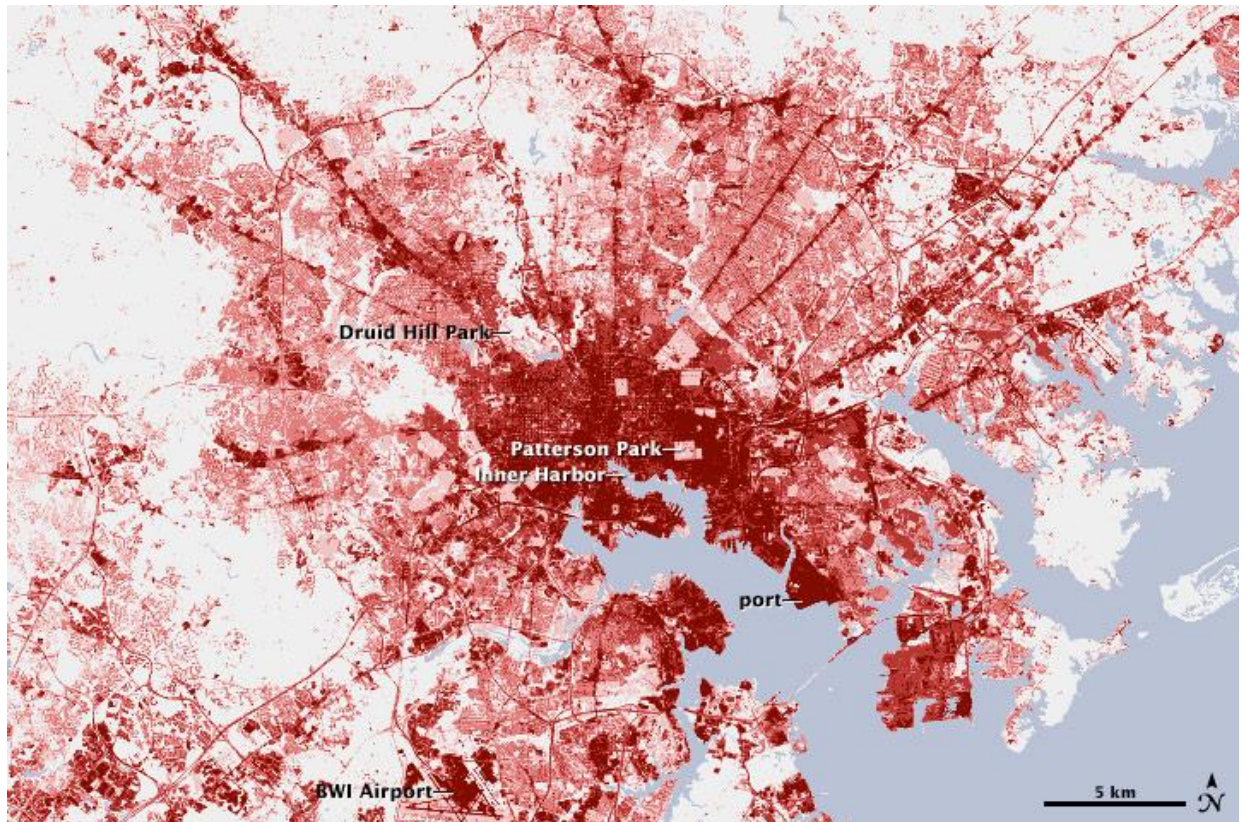
Summer temperatures in urban areas are rising to new levels, creating dangerous heat islands. Heat islands occur when roads, buildings, and other impervious surfaces “absorb and retain heat during the hottest times of the day and reduce cooling overnight.”¹ In addition, heat islands will cause temperatures during the day to rise anywhere from 1 to 7 degrees Fahrenheit and 2 to 5 degrees Fahrenheit at night.² When observing the numerous surfaces and buildings in Baltimore City, one can see that the City is no exception to this effect.³

¹ Rebecca Mann and Jenny Schuetz, The Brookings Institution, *As extreme heat grips the globe, access to air conditioning is an urgent public health issue*, (July 25, 2022), <https://www.brookings.edu/blog/the-avenue/2022/07/25/as-extreme-heat-grips-the-globe-access-to-air-conditioning-is-an-urgent-public-health-issue/>

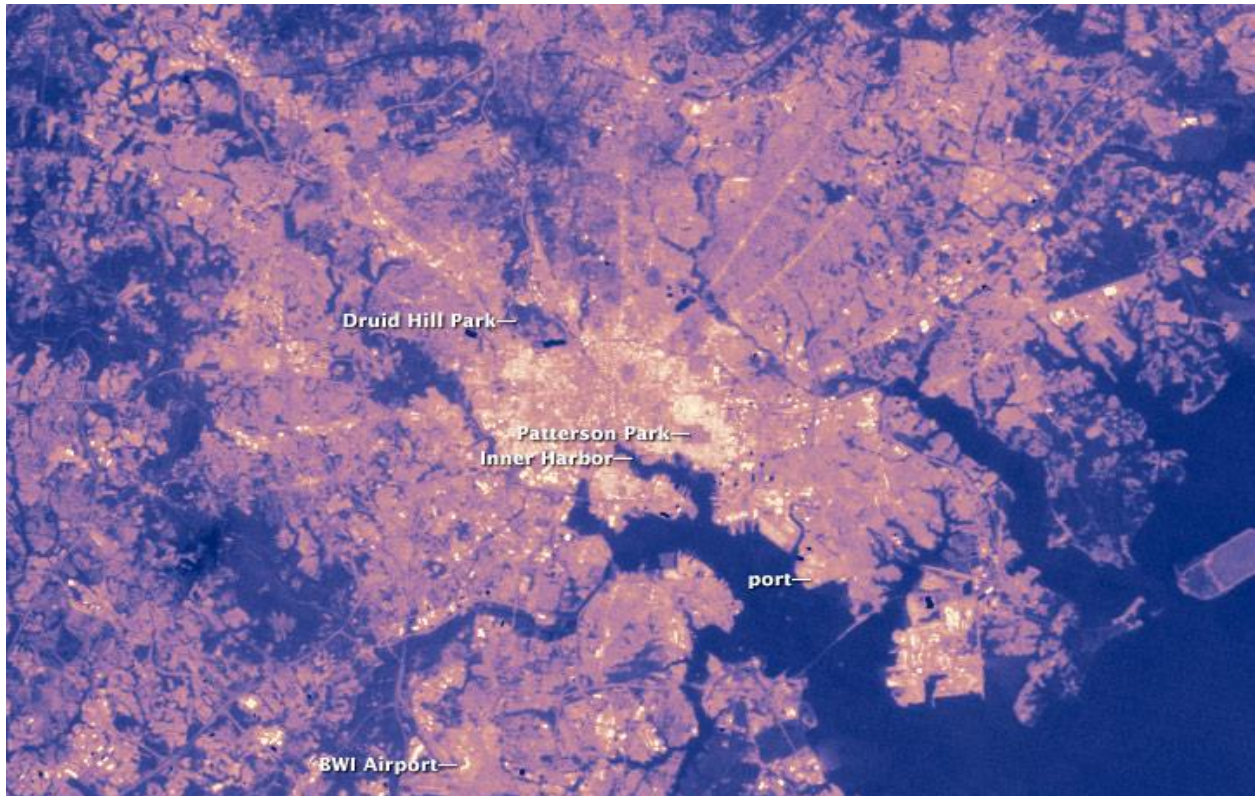
² United States Environmental Protection Agency, *Heat Island Effect*, (Jan. 13, 2023), <https://www.epa.gov/heatislands>

³ Baltimore was ranked in the “95th percentile” for “exhibiting very high [Surface Urban Heat Island Intensity] SUHI intensity, ... high social vulnerability, and low AC prevalence.” SUHI intensity examines the land’s surface temperature, therefore, this statistic demonstrates that lack of air conditioning is more prevalent in the homes of those who need it the most. Yasmin Romitti, Ian Sue Winga, Keith R. Spanglerb and Gregory A. Welleniusb, *PNAS NEXUS, Inequality in the availability of residential air conditioning across 115 US metropolitan areas*, (Sept. 24, 2022), <https://www.osti.gov/pages/biblio/1901592>

To better demonstrate the magnitude of this effect, the Baltimore Office of Sustainability has produced two maps that reveal the breadth of this problem, and these maps have been included below.⁴ In the first map, the areas in red indicate locations with the largest volumes of objects that absorb heat, and the areas in white represent locations covered with vegetation. The second map denotes the hottest temperatures in yellow, and the lowest temperatures in purple. Viewing both maps together demonstrates that the areas in Baltimore City containing the largest volumes of objects that absorb heat, are the same areas that are exhibiting the highest temperatures. As a result, if amended this bill can ensure protections against the devastating health implications that are caused by living in this heat island.



⁴ Baltimore Office of Sustainability, *Urban Heat Island Sensors*, <https://www.baltimoresustainability.org/urban-heat-island-sensors/>



Living in a heat island is not optimal for anyone and it presents devastating health implications for the very young, older adults, and anyone who possesses a preexisting health condition.⁵ Tenants living in a heat island are more susceptible to heat-related illnesses such as heat exhaustion, heat cramps, dizziness, and one of the most serious, heat stroke, which if left untreated can cause death.⁶ In addition, living in this environment can harm anyone with asthma, cardiac issues, and mental illness by placing these tenants at greater risk of suffering from complications.⁷ Air conditioning can reduce the risk of heat-related illnesses.

⁵ Centers for Disease Control and Prevention, *Protecting Disproportionately Affected Populations from Extreme Heat*, (Aug. 25, 2022), <https://www.cdc.gov/disasters/extremeheat/specificgroups.html>

⁶ Seattle Children's Hospital Research Foundation, *Heat Exposure and Reactions*, (Mar. 1, 2023), <https://www.seattlechildrens.org/conditions/a-z/heat-exposure-and-reactions/>; Center for Disease Control and Prevention, *Older Adults and Extreme Heat*, (June 9, 2021), <https://www.cdc.gov/aging/emergency-preparedness/older-adults-extreme-heat/index.html#:~:text=Signs%20can%20include%20fainting%2C%20behavior,sweating%20even%20though%20it's%20hot>

⁷ Center for Disease Control and Prevention, *Chronic Medical Conditions*, (June 19, 2017), <https://www.cdc.gov/disasters/extremeheat/medical.html>; Katy Anderson, SingleCare, *How the summer heat can affect your health—and ways to stay safe*, (June 3, 2022), <https://www.singlecare.com/blog/hot-weather-health-risks/#:~:text=Asthma%2C%20COPD%2C%20and%20allergies,->

Maryland Law Burdens a Tenant's Ability to Obtain Air Conditioning

Maryland law does not require that landlords provide air conditioning in residential rental units; nor does Baltimore City law. Legal requirements in residential leases do not provide tenants an effective avenue of relief to secure air conditioning.

Generally, the warranty of habitability requires landlords to provide tenants with a home “that meets basic structural, health, and safety standards.”⁸ This is evidenced in Maryland law by Real Property §8-211, creating a process for tenants to seek relief for “conditions [that] present a substantial and serious threat of danger to the life, health and safety of the tenants.” Lack of “heat, light, electricity, or hot and cold running water” are presumptive conditions that trigger a landlord’s obligation to repair and a tenant’s right to bring a rent escrow action, holding back rent until the repairs are made. Real Property §8-211(e) and (i). However, lack of air conditioning is presumed to not be a basis for tenant action, unless the tenant can prove the lack of air conditioning presents “a serious and substantial threat to the life, health, or safety of [the] occupants.” Real Property §8-211(f). That is a significant burden on tenants. Lack of air conditioning, particularly in heat island areas, can be just as fatal as lack of heat yet landlords are presumptively required to provide heat and presumptively protected against such a requirement for air conditioning. With the rent escrow essentially unavailable as a mechanism for tenants to secure air conditioning, tenants need protective legislation.

Based on the serious impact that lack of air conditioning can have, Montgomery County, Maryland and Dallas, Texas have enacted laws that require landlords to provide air conditioning for tenants. Montgomery County’s law resembles this bill by requiring air conditioning to be provided in multifamily units from June 1 through September 30, and it requires that a minimum temperature of 80 degrees Fahrenheit be maintained. Montgomery County’s law requires that air conditioning be provided to all residents living in specified units regardless age.⁹ In Dallas, Texas an owner is specifically required to “provide and maintain in operating condition, refrigerated air equipment” that maintains a temperature of no greater than 85 degrees Fahrenheit for all tenants.¹⁰ These local laws reveal growing public policy that recognizes the potentially devastating impact of extreme heat and the legislature’s ability to act to protect tenants.

Certain%20respiratory%20conditions&text=%E2%80%9CHigher%20temperatures%20contribute%20to%20the,(CO PD)%2C%20and%20allergies.

⁸ Kerri McGowan Lowrey, The National Network for Public Health Law, *Rent Escrow as a Tool for Enforcing Tenants’ Rights*, (Jan. 9, 2023), <https://www.networkforphl.org/wp-content/uploads/2023/01/Rent-Escrow-as-a-Tool-for-Enforcing-Tenants-Rights.pdf>

⁹ Montgomery County, Md. The Montgomery County Code, Light, Ventilation Heating, Temperature Control § 26.7 (2023).

¹⁰ Dallas, Tex. City Code of Dallas, Texas, Article III, Utility and Appliance Standards § 27-11 (e) (2022).

Proposed Amendment

While Senate Bill 757 will ensure that tenants in vulnerable age groups will receive access to air conditioning, we are respectfully requesting an amendment to require air conditioning for all rental units. By ensuring access to air conditioning for all, this bill can offer protections to all tenants impacted by living in a heat island.¹¹

Additionally, if this bill is not amended, it could create more harm than good, as it could open the door for landlords to discriminate against renters who have a child 3 years of age or younger, or are themselves 65 years of age or older. In order to eliminate this possibility, an anti-discrimination provision would need to be added to this bill. In addition, implementing a nondiscrimination provision could create administrative challenges for landlords as well as enforcement and implementation challenges for Baltimore City. Specifically, landlords would be required to actively monitor the age of every tenant to ensure that landlords are following the law. The City would need to strategize procedures to ensure landlords are complying with the law, and that any home inspected by the Baltimore City Department of Housing & Community Development complied with the law. Thus, it is mutually beneficial for both landlords and tenants to strike the age requirement and ensure that all renters have access to a safe and livable home.

Conclusion

Requiring landlords to provide air conditioning to all residents will add protections against the heat island effect, improving living conditions for tenants throughout the City. For these reasons, we respectfully urge this Committee to amend this bill and provide a favorable report.

This testimony is submitted on behalf of the Public Health Law Clinic at the University of Maryland Carey School of Law and not by the School of Law, the University of Maryland, Baltimore, or the University of Maryland System.

¹¹ Center for Disease Control and Prevention, *Chronic Medical Conditions*, (June 19, 2017), <https://www.cdc.gov/disasters/extremeheat/medical.html> ; Katy Anderson, SingleCare, *How the summer heat can affect your health—and ways to stay safe*, (June 3, 2022), [https://www.singlecare.com/blog/hot-weather-health-risks/#:~:text=Asthma%2C%20COPD%2C%20and%20allergies,-Certain%20respiratory%20conditions&text=%E2%80%9CHigher%20temperatures%20contribute%20to%20the,\(CO PD\)%2C%20and%20allergies.](https://www.singlecare.com/blog/hot-weather-health-risks/#:~:text=Asthma%2C%20COPD%2C%20and%20allergies,-Certain%20respiratory%20conditions&text=%E2%80%9CHigher%20temperatures%20contribute%20to%20the,(CO PD)%2C%20and%20allergies.)

MMHA_UNFAV_SB757.pdf

Uploaded by: Lauren Graziano

Position: UNF



Date: March 7, 2023

Committee: Judicial Proceedings

Bill: Senate Bill 757- Baltimore City - Air Conditioning in Residential Rental Units

Position: Unfavorable

This testimony is offered on behalf of the Maryland Multi-Housing Association (MMHA). MMHA is a professional trade association established in 1996, whose members consist of owners and managers of more than 210,000 rental housing homes in over 958 apartment communities. Our members house over 538,000 residents of the State of Maryland.

Senate Bill 757 (SB 757) requires housing providers in Baltimore City to provide air conditioning to its residents, if any resident in a unit is under 3 years, or over 65 years. In properties where the resident controls the cooling system, the provider must supply an air conditioning system that can cool the space to at least 80 degrees. If the resident does not control the cooling system, the housing provider must keep the unit cooled to at least 80 degrees.

SB 757 is intended to address health and safety concerns associated with excessive heat during the summer months. However, MMHA believes there is already an adequate remedy at law in instances where the absence of air conditioning presents a true health or safety concern. Md Code Ann. Real Property § 8-211 allows residents to bring a rent escrow action to compel housing providers to supply air conditioning, if a lack of air conditioning creates a substantial threat to the life, health, or safety of occupants. Moreover, there are no age restrictions in the rent escrow statute, which provides a wider scope of protection than what is proposed in SB 757. The rent escrow statute also has the benefit of allowing housing providers to assess cooling solutions on a case-by-case basis, free of the limitations prescribed in the bill such as temperature requirements and types of spaces that must be kept cool.

While the bill attempts to limit the scope of applicability to certain residents, as a practical matter, an affirmative duty to provide air conditioning would induce housing providers to equip all units with air conditioning capability, since resident demographics are fluid and constantly subject to change. This renders implementation of the bill very expensive, considering many buildings in the city of Baltimore have older electrical systems and infrastructure. Significant renovations of this kind ultimately increase costs for residents.

For instance, one member reports that the recent installation of a ductless air conditioning system totaled nearly \$15,000 per unit, in a property with 219 units. This project resulted in a rent increase of \$105 per month for each resident after installation. Larger projects that require potential ductwork, mounting, cages, and additional electrical upgrades would carry additional costs. When considered with the inflation surge over the last two years which has required

housing providers to raise rents to cover the cost of spiking wages, property taxes, insurance, and maintenance, additional increases are potentially very meaningful for some residents.

One might argue that window units could provide a more affordable solution, however, there are concerns about the ability to sufficiently cool every habitable space in the unit to standards specified in the bill, given that a window unit is only capable of cooling a limited square footage area. This concern could potentially be mitigated with additional language that if an apartment unit has a window unit cooling system, the temperature requirements would apply only to the rooms which they are intended to serve. However, such a solution can already be provided through a rent escrow action.

For the aforementioned reasons, MMHA would request an unfavorable report on SB 757.

For more information, please contact Lauren C. Graziano, Senior Government Affairs Manager, at 518-522-3529

HABC - SB 757 Letter of information.pdf

Uploaded by: Crystal Hypolite

Position: INFO

Robin Carter
Chairperson, Board of Commissioners

Janet Abrahams
President | Chief Executive Officer



SB 757

March 7, 2023

TO: Members of the Judicial Proceedings Committee

FROM: Janet Abrahams, HABC President & CEO

RE: Senate Bill 757 - Baltimore City – Air Conditioning in Residential Rental Units

POSITION: Letter of Information

Members of Judicial Proceedings Committee, please be advised that the Housing Authority of Baltimore City wishes to submit Information on SB 757 - Baltimore City – Air Conditioning in Residential Rental Units.

SB 757 establishes that every residential landlord in *Baltimore City* provide air conditioning in units from June 1 through September 30 where at least one resident is: 3 years or younger; or 65 years of age or older. The bill also proposes that a landlord maintain the temperature at a setting no greater than 80 degrees Fahrenheit and 3 feet above the floor level.

The Housing Authority of Baltimore City (HABC) is the country's 5th largest public housing authority and Baltimore City's largest provider of affordable housing opportunities. HABC serves over 42,000 of Baltimore City's low-income individuals through its Public Housing and Housing Choice Voucher programs. HABC's public housing inventory currently consists of just under 6,000 units located at various developments and scattered sites throughout the city. HABC is federally funded and regulated by the U.S. Department of Housing and Urban Development (HUD). HABC respectfully requests that properties owned and operated by a public housing authority be exempt from this legislation.

HABC is subject to federal laws and regulations that pertain to the operation of its housing programs. One overarching federal law is the Fair Housing Act, which discrimination against protected classes such as families with children and persons with disabilities. SB 757 would have the effect of having a discriminatory effect on these two groups in particular. The bill requires air conditioning for families with children three years or younger. However, the Fair Housing laws would not permit HABC to selectively install air conditioning based on this criterion since such actions would discriminate against families with children older than three years and who do not have children in the household three years or younger. Also, the bill requires air conditioning in dwelling units for persons who are 65 years or older. Although this age group may be a protected class under Maryland law, this age group is not a protected class under the Fair Housing Act. Moreover, if this bill were enacted, its implementation would result in discrimination against persons with disabilities, which is a protected class under the

Housing Authority of Baltimore City | 417 East Fayette Street, Baltimore, MD 21202

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federal Fair Housing Act.

HABC requests clarification on whether this bill requires landlords of buildings that do not have central air conditioning to provide units to the eligible households, or whether it merely requires landlords to set the cooling at no greater than 80 degrees if there is central air conditioning in the building. HUD has specific requirements about how public housing units are to be maintained, and all public housing authorities must comply with these requirements. HUD regulations do not require that HABC provide or install air conditioning units for residents. HUD does require that a “reasonable accommodation” be provided for air conditioning usage if the resident demonstrates a need. This accommodation would be reflected in the utility allowance provided to the resident. It would be above and beyond what a resident currently receives for a baseline utility allowance. HUD does not require that HABC install and maintain air conditioner units for residents.

Residents of HABC’s public housing can purchase and install window air conditioner units within their dwelling units when central air conditioning is not provided. The window where the air conditioner is to be installed must not be used for an emergency exit. If an air conditioning unit was installed in a residence with only one emergency exit, it would be considered a blocked egress, which would violate HUD regulations. This would result in a finding on our yearly HUD inspections, which could potentially impact our funding and our ability to provide housing.

Further, If the bill requires landlords to provide air conditioner units and maintain them where there is not central air conditioning in the building, it would result in a substantial cost burden. In addition to cost of purchasing, installing and maintaining air conditioning unit for potentially up to 6,000 public housing units, there would also be a significant impact on the increased electrical load on our aged electrical infrastructure leading to mass black outs and brown outs, as the average age of our buildings is approximately 80 years. This impact would vary by site, and HABC would have to overhaul entire electrical systems, which could take well over two years from concept, design to completion.

In addition, this bill would affect utility allowances (UAs) provided to residents, as HUD does not consider air conditioning a covered utility for public housing, except in certain circumstances. This means that residents who are already struggling to afford rent would be responsible for an additional utility expense. The bill would also affect Housing Choice Voucher Program participants or landlords in determining the UA for those residents, as the HUD regulation requires that if the comparable properties in the area provide air conditioning then the UAs must also include an allowance for air conditioner usage.

Again, HABC needs further clarification about the requirements of the bill in order to appropriately assess its implications.






We respectfully request an exemption for public housing authorities on Senate Bill 757.

Respectfully submitted:

Janet Abrahams, HABC President & CEO

Housing Authority of Baltimore City | 417 East Fayette Street, Baltimore, MD 21202

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