



**NEW YORK CITY DEPARTMENT OF BUILDINGS
TESTIMONY BEFORE THE NEW YORK CITY COUNCIL
COMMITTEE ON SANITATION & SOLID WASTE MANAGEMENT
COMMITTEE ON PUBLIC HOUSING
JUNE 21, 2022**

Good morning Chair Nurse, Chair Avilés, and members of the Committees on Sanitation and Public Housing. I am Guillermo Patino, Deputy Commissioner for External Affairs at the New York City Department of Buildings (“the Department”). I am pleased to testify before the Committees in support of Intro. 442, which would require that rodent abatement measures be taken prior to the start of certain construction work.

Currently, before demolition work can occur, the Department requires that rodent abatement measures be taken. This includes hiring a licensed exterminator to visit the demolition site before a permit for such demolition work is issued by the Department. The New York City Building Code also prescribes certain measures that must be incorporated into the design of buildings to help prevent rodent access and infestations. For example, openings into buildings that accommodate pipes or cables must be protected to help prevent access. The bill before the Committees would build upon current regulations to help mitigate the impact that construction work has on the surrounding community by requiring that rodent abatement measures be taken prior to the start of more construction projects, to include significant construction or demolition work. The Department looks forward to working with the Committees on this issue.

Thank you for the opportunity to testify before you today. I welcome any questions you may have.

**TESTIMONY FROM NYCHA SENIOR VICE PRESIDENT FOR OPERATIONS SUPPORT
SERVICES KEITH GROSSMAN
SANITATION AT NYCHA
COMMITTEE ON PUBLIC HOUSING WITH THE COMMITTEE ON SANITATION AND SOLID WASTE
MANAGEMENT
TUESDAY, JUNE 21, 2022 – 10:00 AM
COMMITTEE ROOM, CITY HALL, NEW YORK, NY**

Chairs Alexa Avilés and Sandy Nurse, members of the Committees on Public Housing and Sanitation and Solid Waste Management, other distinguished members of the City Council, NYCHA residents, and members of the public: good morning. I am Keith Grossman, NYCHA's Senior Vice President for Operations Support Services. Joining me are Vlada Kenniff, Senior Vice President for Sustainability; Josephine Bartlett, Senior Director of Pest Control; and Al Ferguson, Senior Director of Waste Management. We are pleased to have our partners at the NYC Department of Sanitation (DSNY) with us today as well. Our colleagues from the Health Department are also with us to discuss Intro. 414, pertaining to reporting on rat mitigation zones. The Administration supports the intent of this bill and looks forward to working with the Council to align this with available data.

I joined NYCHA this April from the NYC Department of Education (DOE), where I oversaw the emergency management program and the accessibility remediation program for all of the DOE's approximately 1,900 schools. Before that, I was the Director of Emergency Management and Safety at Brookdale University Hospital and Medical Center. It is an honor to bring my passion for managing complex operations and vital services to the NYCHA community.

Thank you for this opportunity to discuss the Authority's progress in improving the quality of life for residents through better waste management and pest control. We know how impactful these areas are for NYCHA residents – and making sure that our buildings and grounds are clean and as pest free as possible is one of our top priorities. We have made significant changes to ensure that our waste management and pest control methods are comprehensive, modern, and effective, and we continue to apply the latest technologies and strategies to further our work in service to residents.

Organizational Improvements

For instance, after an extensive analysis, NYCHA divided Waste Management and Pest Control into two separate departments, which are now under the oversight of the new Operations Support Services division. This separation allows us to have better control over all pest and waste remediations throughout NYCHA's portfolio.

We also implemented IT enhancements that facilitate our work and we trained staff on Integrated Pest Management (IPM). In the past few years, we added a number of exterminators to our team, meaning that we now have a total of 124 exterminators who work hard to provide safe and clean homes, buildings, and grounds for residents. We also increased our caretaker staff, who help keep our buildings and grounds clean, bringing the total number of caretakers to nearly 4,500.

NYCHA's Action Plan on Pests and Waste

Under the leadership of Chair Greg Russ, and in accordance with the 2019 HUD Agreement, we are transforming our organization to improve how we provide services to residents – and we are making the investments necessary for success.

The Federal Monitor, Bart Schwartz, approved our Pest and Waste Management Action Plan in January 2021. The Action Plan is our roadmap for more effective waste management and pest control. It is centered around the use of IPM and development-specific waste management plans for every NYCHA property, and it is supported by capital upgrades and new approaches to pest and waste management.

A key focus of the Action Plan involves improving the way NYCHA collects, stores, and removes waste to meet our goal to remove or store all waste in sealed, rodent-resistant containers every 24 hours. This is critical because better waste management means fewer pests, as we're eliminating their habitats and sources of food. Today I'll go into

detail about some of the waste infrastructure upgrades and programmatic improvements that are enabling us to deliver better for residents.

Combatting Pests and Waste Through Sustainable Improvements

Infrastructure Upgrades

NYCHA's current waste infrastructure – which handles over 200,000 tons of waste every year – is outdated. Since NYCHA's developments were built, the amount of waste generated by Americans has tripled; at the same time, NYCHA's infrastructure hasn't received the investments it's needed to keep up with the increase. In fact, more than 90 percent of our waste assets are past their life cycle and need immediate replacement.

The Federal Monitor approved NYCHA's City Capital Action Plan last year, which unlocks over \$563 million in funding to help the Authority fully upgrade and modernize its waste infrastructure. That's coupled with an investment of \$56 million toward the City's Neighborhood Rat Reduction program, which has enabled us to accomplish the following:

- Install larger trash chute doors that can accommodate a standard 13-gallon tall kitchen garbage bag on the first level of 60 developments, which helps residents dispose of trash properly;
- Install new interior trash compactors at 51 developments, exterior compactors at 18 developments, 5 bulk crushers, and 39 cardboard compacting baling machines – all of which enable us to manage waste more effectively and efficiently;
- Install over 8,000 door sweeps and seal over 600 window wells to prevent pests from getting into our buildings; and
- Install 27 (of 50) “rat slabs” that eliminate places for rodents to live, eat, and breed by replacing the original dirt basement floors with concrete.

With this total funding of more than \$619 million, we'll be able to replace aging waste, recycling, and bulk waste equipment across 194 developments. The procurement process is currently underway for the next round of projects at 64 developments.

In 2019, the Authority released the NYCHA 2.0 Waste Management Plan, a comprehensive set of strategies for delivering state-of-the-art infrastructure and providing residents with convenient locations for disposing recyclables and food waste – all to greatly reduce pests and make our developments cleaner.

To advance the Waste Management Plan, last year we released Requests for Proposals for the redesign of seven waste yards, and for new pneumatic waste collection systems at Polo Grounds Towers and Rangel Houses. We expect to finish design and start construction on these projects this year. By 2028, a complete overhaul of the waste yards at up to 194 developments will be underway. The new waste yards will feature more operational functionality for staff, recycling infrastructure, and reliable compactors, making waste handling more efficient and benefitting residents' quality of life. The new waste yards will also incorporate resident feedback in their design and will be more aesthetically pleasing.

The pneumatic waste collection systems at Polo Grounds and Rangel Houses will transport waste underground from each building to a centralized facility, where it will be compacted in a sealed, pest-resistant container. The new system will reduce the labor involved with transporting waste and minimize pests.

Innovative and Sustainable Initiatives

We are also implementing programmatic improvements. For example, our “Clean Curbs for All” initiative with the Sanitation Department will pilot mechanically collected curbside containers for refuse and recyclables, resulting in more efficient waste collection and cleaner grounds. We expect to release a Request for Proposals by the end of the summer.

We worked with the Sanitation Department to obtain a significant increase in the number of DSNY-funded bulk container dump tickets. This enabled us to remove over 15,000 additional tons of bulk waste from NYCHA developments in 2021. And we worked with the carting vendors who currently service most of our bulk containers to increase the frequency of bulk waste removal at our developments. To demonstrate the benefits of increased waste collection frequency at a small group of developments, we purchased two 6-yard rear-loader compacting garbage trucks that can each hold approximately three tons of household refuse per load. These trucks are equipped with the latest in Vision Zero safety designs (including 360-degree cameras for enhanced driver awareness) and have the latest in hybrid (diesel and electric) technology.

NYCHA also worked with our Sanitation Department partners to develop a Recycling Reset pilot program in 2020 to improve recycling rates at 12 sites: Baruch and Baruch Addition, Bushwick, Hylan, Butler, Marcy, Morris I and II, Riis I and II, Webster, and Morrisania. Several sites, such as Baruch Houses and Riis Houses, are recycling at record high rates. In September 2021, we rolled out the Recycle First Initiative in Staten Island, a mindset change that prioritizes recycling when it comes to waste management operations. Working with DSNY and development staff, we improved recycling rates at all 10 Staten Island sites (Berry, Cassidy-Lafayette, Mariner's Harbor, New Lane Area, Richmond Terrace, South Beach, Stapleton, Todt Hill, West Brighton I, and West Brighton II). This May, we rolled out the initiative to Queens at Queensbridge North, Queensbridge South, and Ravenswood.

We are also working with DSNY to develop a Caretakers Recycling Guidebook that will facilitate our caretakers' management of recyclables. Informed by the Recycle First mindset, this Guidebook will provide the reference point for all caretaker training on waste management operations. We are also developing a training series that will inform staff about our sustainable waste management programs and infrastructure, such as cardboard balers and mattress recycling.

We developed Individual Action Plans that present short-, medium-, and long-term goals to improve waste management at each of our developments, such as additional

monthly bulk tickets or expedited compactor replacement. All the plans are posted on our website. With the assistance of the Federal Monitor, we are finalizing a “Scorecard Cleanliness Rating System” that identifies where we need to focus our resources at our developments.

Last year, we launched NYC’s first and only mattress recycling program. To date, we’ve recycled over 6,000 mattresses at 39 developments across all five boroughs.

We worked with DSNY to convert under-used trash compactors into cardboard compactors at three developments (Marcy, Morris I, and Queensbridge South), which collect cardboard from a total of 16 neighboring developments. More than 200 tons of cardboard have been recycled at these sites, and we’re working with DSNY to expand the program.

As outlined in NYCHA’s 2021 Sustainability Agenda, the Authority is committed to removing organic waste from household waste streams, eliminating food sources for pests, and diverting organic materials from landfills. Our Farms at NYCHA sites are helping to achieve these goals: Since 2016, our lead partner, Green City Force, has collected over 32,000 pounds (or 16 tons) of compostable food scraps from NYCHA residents. One Green City Force alum and former NYCHA resident, Domingo Morales, is working to expand composting at NYCHA developments through an initiative he started called Compost Power. In 2020, Compost Power organized composting at five NYCHA developments that can now process at least 50 tons of organic waste per year. Compost Power provides NYCHA residents with the opportunity to reduce waste from landfills while creating eco-friendly jobs. Additionally, DSNY placed a compost bin at Ravenswood Houses; NYCHA and DSNY will engage residents for their input on where additional compost bins could be placed.

Our waste management efforts are being carried out in partnership with residents and other stakeholders. For example, NYCHA is developing a “Campaign for a Clean NYCHA” to better communicate with, and engage, residents on proper waste management and recycling programs. The Campaign was piloted at five developments

last year; pilot evaluation and the development of a rollout plan is underway. The Campaign applies the tools of public awareness and behavior change to define and promote a positive waste culture at NYCHA.

Thanks to the City Cleanup Corps initiative, we were able to hire more than 1,300 seasonal workers, of whom nearly half were NYCHA residents, to help keep our grounds, playgrounds, and buildings clean and to assist with pest control. Over 400 of these workers were hired for permanent roles.

Integrated Pest Management

Integrated Pest Management (IPM) is the cornerstone of our new approach to pest management. IPM focuses on long-term, sustainable solutions that target the underlying causes of pest infestations. Exterminators minimize pesticide use and focus on non-toxic pest control methods: They perform a thorough inspection, removing sources of food and water and sealing any points of entry through caulking and installation of escutcheon plates.

We rolled out IPM Authority-wide, incorporated IPM protocols into our IT systems, and issued updated standard procedures and guidance regarding IPM to staff. We trained over 900 staff – exterminators, caretakers, supervisors, and other property management staff – on the fundamentals of IPM, and we launched quarterly trainings on IPM topics, including trainings for new hires. Since education is an essential part of pest control, we provided residents with informative materials on pest prevention, such as handouts, rent inserts, and a comprehensive pest control NYCHA webpage.

To aid our work, we also developed a model for tracking and measuring pest data. This involves determining an estimate of the pest population – to date, we've conducted nearly 2,100 inspections to establish this baseline.

Our Commitment to Residents

While we acknowledge that more work needs to be done to provide residents with the homes they deserve, we are making progress to become a better landlord, through targeted investments with the limited resources we have, as well as innovative programs and strategies. By working together with residents, City agency partners, and other stakeholders, we can continue to improve pest and waste management and make a difference for residents.

Thank you for your support as we strive to improve residents' quality of life. We are happy to answer any questions you may have.

**STATEMENT OF THE NATURAL RESOURCES DEFENSE COUNCIL
BEFORE THE NEW YORK CITY COUNCIL
COMMITTEE ON SANITATION AND SOLID WASTE MANAGEMENT &
COMMITTEE ON PUBLIC HOUSING
RE: SANITATION AT NEW YORK CITY HOUSING AUTHORITY
AND RAT MITIGATION BILLS**

June 21, 2022

Good afternoon to two intrepid Committee Chairs – Councilmember Nurse and Councilmember Aviles! Thank you for inviting me to testify regarding the New York City Housing Authority’s sanitation policies.

My name is Eric A. Goldstein and I am New York City Environment Director at the Natural Resources Defense Council (“NRDC”). As you know, NRDC is a national, non-profit legal and scientific organization active on a wide range of environmental health, natural resource protection and quality-of-life issues internationally, across the country and right here in New York City, where we have had our main offices since NRDC’s founding in 1970. Over the decades, NRDC staff have had as one of our top regional priorities the goal of transforming New York’s waste system from primary reliance on landfilling and incineration to one that has waste prevention, composting, recycling and equity as its cornerstones.

Operating the New York City Housing Authority (“NYCHA”) developments -- with over 400,000 residents in more than 300 public housing complexes – in a sustainable manner has long been a major challenge. We know, of course, of NYCHA’s difficult operating environment and the tough conditions NYCHA managers have faced, including dramatic cutbacks in federal funding over the decades. And we understand that the problems they face extend well beyond solid waste and include nonfunctioning elevators, peeling lead paint, balky heating systems, extensive mold problems and on and on.

Despite these many challenges, waste issues should not be placed on the bottom of the To-Do List. And for more than 30 years, since the passage of the city’s 1989 mandatory recycling law, NYCHA management has given waste challenges at its developments a very low priority -- to the detriment of NYCHA residents who desire and deserve decent sanitation services, just like every other New Yorker.

On waste issue after waste issue, NYCHA’s performance has been below expectations:

- Metals, Glass and Plastic Recycling – The city’s core MGP recycling program is a good example. NYCHA didn’t even have recycling bins available for its hundreds of thousands of residents to use until resident recycling activists at the General Grant Houses in West Harlem began agitating for them, followed by more pressure from South

Bronx resident Brigitte Vicenty who asked NRDC to help in 2013. Even now, after DSNY installed recycling collection receptacles, the bins are outside in the middle of many developments and too long a distance to walk for many residents; they are also too small and frequently contaminated because the whole system of NYCHA waste collection is poorly functioning.

- Textile Recycling – Despite the availability of the city’s Refashion NYC textiles collection program, only a handful of NYCHA tenants have access to this valuable service. Why? NYCHA management hasn’t requested the installation of these relatively small collection bins, or hasn’t made room for them, in their buildings.
- Electronic Waste Recycling – Same story with e-waste. The city’s electronics collection program -- e-cycle NYC -- is available for all buildings with 10 or more units. It is free and convenient for residents to simply drop their TVs or computers into the bin and when the bin is full, the building manager can contact the city’s contractor to collect the materials and empty the bin. But although it has been illegal in New York to dispose of electronics with household trash since 2015, NYCHA management has failed to facilitate the safe disposal of electronic waste for hundreds of thousands of NYCHA residents.
- Corrugated Cardboard Recycling – Again, as NYCHA itself concedes, most of the corrugated cardboard waste generated at its developments is still treated as “bulk waste” instead of being recycled as required by city law. It’s amazing that more than 30 years after passage of the city’s 1989 recycling law, NYCHA has continued to flout most of the statute’s directives.
- Food Waste Recycling/Composting – Food waste, the largest portion of the residential waste stream, is for the most part still going from NYCHA apartments to landfills or incinerators. But at landfills, this waste breaks down and generates methane, a very potent climate-destroying gas. And when sent to incinerators, the high moisture content of food waste fouls the burning process and leads to increased localized air contamination.
- Rats – As a consequence of the above-described shortcomings, and other poor trash handling practices, the rats at many NYCHA developments are living the good life. Too often, they are running rampant.

NYCHA managers should consider these conditions unacceptable. And as the city’s largest landlord, NYCHA should be required to come into compliance with all sanitation and health code laws and rules.

NYCHA’s testimony earlier today was only mildly encouraging. We’ve seen NYCHA managers offer similar promises in the past. For years, in fact. Again, we recognize the financial constraints and space limitations that NYCHA faces. And we don’t question the sincerity of these officials. But I believe I speak on behalf of all NYCHA residents when I say,

we're tired of waiting. And much of what we heard today is more long-term promises and extended timetables. For example, the promise in NYCHA's 2019 Waste Management Plan 2.0 to deliver state-of-the-art infrastructure and new waste yards has moved forward at only two developments – the Polo Grounds and Rangel Houses. At that rate, the system conversions won't be completed until the next century and the rats living in the unaddressed developments will have grandchildren.

We offer four modest recommendations:

- 1) Hold NYCHA RAD-Building Managers to Account -- One piece of encouraging news has been the engagement of private developers that have taken over the management of several NYCHA properties, including Boulevard Houses and other Brooklyn locations, under the RAD program. We urge DSNY and the Department of Health and Mental Hygiene to put these private property managers on notice that they will be held to the highest standard of compliance with all recycling laws and pest-free requirements applicable to all multi-story dwellings in New York City.
- 2) Expand Successful NYCHA Recycling and Composting Pilots -- We urge NYCHA to support and enhance the fledging pilot projects that have been initiated in recent years. These include Brigette Vicenty's 2017 recycling pilot in the Bronxville House, where recycling rates tripled. This project has now been expanded to three developments. But it warrants a much more rapid build-out. Similarly, Domingo Morales' wonderful Compost Power composting pilot, now at five NYCHA developments should also be expanded to cover all NYCHA properties over the next four years.
- 3) Ensure that NYCHA Managers Meet Their Commitments -- In today's testimony, in previous appearances before the Council, and in a handful sustainability plans, NYCHA managers have made commitments to transform the agency into one that handles its waste challenges effectively and sustainably. The Council must hold these managers to their promises. NYCHA should be called back to report to these two Committees in six months and asked to give a full accounting of their compliance with recycling requirements and progress on rat-control (including the presentation of monthly NYCHA complaint tallies).
- 4) Enact Anti-Rat Legislation, Including Adoption of Universal Curbside Organics Collection -- Finally, in terms of rat mitigation, although we haven't had the opportunity to review the proposed bills before these committees in detail, we support their thrust and intent. And we restate that among the most helpful things the Council can do to reduce the city's rat invasion would be to enact Intro 244, which would create a universal curbside composting program; among that bill's many benefits would be the use of rat-proof containers for all food waste, eliminating the current easy-to-tear-through plastic bags for organics disposal.

Thank you for your attention.

Compulsory Composting should be required of all residents as regular weekly collection just as regular garbage pickup. Compost collection supports the Zero Waste initiative. It is good for the environment and good for waste management.

Richard L Faraino

Testimony of Allison Allen (allisonaallen@aol.com):

I testified at last week's sanitation committee hearing regarding the zero waste bills, which included a bill for mandatory city wide organics collection. I talked about rats, as there has been much attention (and press coverage) understandably focused on NYC's litter and rat problems and overall support of waste containerization pilots. But very little mention that we already have an existing, free food waste containerization program - DSNY's brown bin program. There is a direct connection between rats, litter, organic waste and the curbside brown bin program that should be underscored and stressed. I ask all council members to help amplify and elevate that message in any discussion of rats, litter and the new rat action plan. We need to do everything possible to promote enrollment and increase participation in the DSNY brown bin program and highlight that we already have free rat proof brown bins available in 7 districts currently. If DSNY saw a groundswell of new enrollment requests from high rat areas, perhaps they could justify adding new districts to help combat rats.

Rats are good at getting free press. If the brown bins could share in their coverage, we might raise awareness and increase much needed participation in composting. I heard in the hearing today that every council member has a litter and rat problem in their district. If you are talking about rats, litter or waste containerization, please mention the rat proof brown bins and encourage enrollment.

I support all the rat mitigation bills with some amendments. It's an important step to require an annual report from DOH (per bill #414), as DOH could also be doing much more to promote brown bins to combat rats as one easy, effective and free rat mitigation tactic. We very much need DOH to step up the partnership with DSNY to better make the connection and co-promote related to rats at every possible touchpoint. For example:

- The DOH Rat Portal should provide information and links to enroll in the brown bin program throughout the website, on multiple pages.
 - I personally asked DOH (see my email pasted below), but we need Council Members to make this request, to make it happen.
 - Council Members Velasquez and Barron may be best able to spearhead as they serve on the sanitation and public housing committees as well as the health committee.
- The Rat Academy should strongly encourage enrollment in the brown bin program as a free rat mitigation tactic available now.
- All 311 callers with a rat complaint should be given information on the brown bin program and transferred to someone that can help them enroll, if requested
- Anyone who has received a rat violation should be encouraged (if not mandated) to enroll in the brown bin program.
- Any and all DOH rat related communications should include information on the brown bin program, where feasible
 - For example, here is a letter that DOH mailed to a colleague about mitigating rats in her area. I would guess that hundreds if not thousands receive this mailer. It's a missed opportunity to promote the brown bin program by simply adding a 7th bullet to this letter - which would cost nothing. As this is a mailer, there could have also been a separate insert on the brown bin program - also at no additional cost, other than to make copies:

WARNING: False statements made herein are punishable as a class A misdemeanor pursuant to section 210.45 of the Penal Law. Affirmed under penalty of perjury.

What you should do next:

1. Inspect your property. Thoroughly investigate your property for signs of rats and other conditions that contribute to rats. Review your enclosed inspection report and visit the Rat Information Portal (www.nyc.gov/rats) for more information on how to identify droppings, active rat runs, and evidence of gnawing, tracks or burrows. You may choose to hire a licensed pest management professional to assist you with this problem. The Rat Information Portal (www.nyc.gov/rats) will help you select a pest management professional that can help you identify conditions that have led to the presence of rats on your property and manage the problem safely.
2. Clean up your property. Sweep up droppings and wash away rub marks. This will discourage rats from returning.
3. Keep rats from getting the food they need. Store garbage in hard plastic or metal containers with a tight fitting lid. Do not put garbage out on the street more than one hour before pickup.
4. Eliminate the places rats can hide, nest and breed. Remove clutter and debris from your yard, basement and landscaping. Pest-proof your property by repairing holes and cracks.
5. Talk to others on your block. Managing rats is a community affair, and your property is probably not the only one that has signs of rats. Everyone in a neighborhood has to work together to solve the problem, since rats can quickly move from one property to the next. Neighbors can coordinate cleanup efforts, share in the hiring of licensed pest management professionals, and have a bigger impact by working together.
6. For more information on rat prevention download the guide "Preventing Rats on Your Property" at www.nyc.gov/rats or contact 311 and request a copy of the booklet.

The DOH annual report should also include a detailed budget for rat mitigation, outreach, communications, mailings, pest extermination contracts, etc.. This should be added to bill #414..

Building owners and property managers in areas where rat populations are high should also be targeted with information on the curbside organics program. They need to be better informed about the connection between rats and organics left in easily opened black plastic bags as well as other building benefits. I understand that DSNY does have some materials and does outreach. DOH should do the same in their communications.

DOH should also be monitoring buildings with high rat populations that start using the brown bins to track any reported improvements or changes.

Bill #460 requires buildings with repeated rodent infestations to use rat resistant trash receptacles. These buildings should also be considered for immediate mandatory organics collection in DSNY's rat proof brown bins. Remove the food from the trash and the rats will likely move elsewhere.

Bill #459 includes that buildings set out trash 4am-6am but many buildings don't have staff at that

hour. In addition, there are concerns that street dining sheds are major contributors to the problem and that fines in areas surrounding them have increased significantly. Perhaps when increased street cleaning and litter basket pickups resume, we will see some decrease, but DOH should look into how many dining sheds are in these areas and hold the businesses more accountable.

As Council Members are out talking about how great the new waste containerization pilots are, I hope you will all make an effort to also include messaging about the brown bin program as a free way to containerize food waste NOW - whether or not your area is one of the 7 existing districts receiving service. I would like to see areas that index highest for rats, receive mandatory curbside organics collection services immediately wherever possible.

Lastly, I ask for an update on NYC's rat contraception measures, related costs and metrics. From what I have seen in the news (see link below), this was apparently a successful tactic used by the MTA in the subways in 2017 and would like more information on why it has not been expanded.

<https://www.nydailynews.com/new-york/nyc-deploy-rat-birth-control-attempt-curb-breeding-article-1.3065641>

Rats only live for a year and give birth 6-7 times a year, producing 84 offspring. Contraception may very well be more effective than extermination and is less dangerous to other animals and people. There have been a number of recent incidents of dogs ingesting rat poison and getting sick.

<https://www.westsiderag.com/2022/06/21/more-exposed-rat-poison-surfaces-in-the-neighborhood-another-dog-sickened>

I ask the Council to find out what happened to the contraception program and see if it makes sense to reintroduce or reinstate additional pilot tests and add to the legislation. NYCHA would be a great place to start.

Allison's email to Dept of Health re: adding brown bin mention/promotion to Rat Portal, 311, etc

I will sign up for a Rat Academy event, but I see so many more opportunities to promote the brown bin program via other DOH channels as you manage rat complaints for the city.

For example, would be great if info on the brown bin program could be added to various pages of your website, so the info is available to the general public, including those that call into 311 with rat complaints. These pages (and others) would be a great place to promote the link between deterring rats by enrolling in curbside composting (or taking your food waste to a local food scrap drop off site):

<https://www1.nyc.gov/site/doh/health/health-topics/rats.page>

<https://www1.nyc.gov/site/doh/health/health-topics/rats-working-in-your-community.page>

<https://www1.nyc.gov/assets/doh/downloads/pdf/rats/2021/what-happens-to-your-rat-complaint.pdf>

Also, can the info be pushed out to those buildings that have been found to have rat activity - per your portal? Do you have a way to send out a mass email?

<https://a816-dohbesp.nyc.gov/IndicatorPublic/Rats/>

As your agency is on the front line combatting rats, I'm hoping you can promote this resource via any and all channels available to you, including social channels. I see that you posted the rat academy events on twitter, but would be great to promote the brown bin program to residents and how it's another tool for controlling rats if you have a rat problem in your area. Would help reach those people who aren't able to sign up for the rat academy

I'm happy to help in any way as rats are a real problem for so many New Yorkers while there is a great, free, solution available which will also help divert organic waste from the mainstream to produce compost and clean energy. Food waste comprises 41% of the waste the DSNY exports to landfills where it emits harmful greenhouse gasses, so there are so many reasons to enroll in this program!



Intro. 459

The Rent Stabilization Association of New York City represents 25,000 diverse owners and managers who collectively manage more than one million apartments in every neighborhood and community throughout the city. We thank the Committee for giving us the opportunity to submit these comments on Intro. 459, which would allow for the establishment of rat mitigation zones and mandate the hours buildings with nine or more units can put materials out for collection.

Rats are abundant in areas where there is excavation and construction, road work, vacant lots, open spaces, sources of food and a general lack of cleanliness.

We support the idea of establishing zones in which extermination measures are comprehensive, targeted and coordinated to eradicate rats in problematic zones, where efforts are undertaken to eliminate burrows and food sources, bait and clean. Without joint and targeted efforts, rats will migrate from property to property and block to block and, without a widescale approach, individual buildings can temporarily manage a problem but without coordination, it is sure to recur.

We do not, however, support the creation of limited hours, from 4 am to 6 am, as the time during which garbage can be placed out for collection for buildings with nine or more dwelling units. This creates two major issues. First, this would present a serious logistical issue for private owners of residential buildings. Most private buildings do not have overnight staff; it would be nearly impossible to meet this very limited middle-of-the-night window. Second, rats, for the most part, are an outdoors problem and are not an interior building issue. But keeping trash indoors for extended periods will drive the problem indoors as rats search for food. Additional onsite garbage storage would foster conditions that could create an interior building issue.

Accordingly, the RSA supports the creation of rat mitigation zones and opposes the limited hours for collection placement.

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Greg Anderson

Address: Deputy Commissioner

I represent: DSNY

Address: 125 Worth St NY

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THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 442 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Guillermo Patino

Address: Deputy Commissioner for External Affairs

I represent: Department of Buildings

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 6/21/2022

(PLEASE PRINT)

Name: KEITH GROSSMAN

Address: _____

I represent: NYCHA

Address: 24-02 49th Ave LIC, NY 1101

Please complete this card and return to the Sergeant-at-Arms

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THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 6/21/2022

(PLEASE PRINT)

Name: Vlada Kenniff

Address: 24-02 49th Ave LIC NY

I represent: NYCTHA, SVP for Sustainability

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: June 21, 22

(PLEASE PRINT)

Name: Josephine Bartlett

Address: 34-30 78th St Jackson Heights

I represent: NYCHA Pest Control

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Corinne Schiff

Address: NYC DOHMH

I represent: Deputy Commissioner

Address: Environmental Health

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 6/21/22

(PLEASE PRINT)

Name: ALFRED FERGOSON

Address: 52 BELWOOD LOOP ST, NY, 10307.

I represent: NEW YORK CITY HOUSING AUTHORITY

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: JUNE 21, 2022

(PLEASE PRINT)

Name: ERIC GOLDSTEIN

Address: _____

I represent: NATURAL RESOURCES DEFENSE

Address: 40 W. 20 ST NY NY COUNCIL
10011

Please complete this card and return to the Sergeant-at-Arms