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Thank you for the opportunity to comment.

When I was younger I needed to obtain a food handlers license for my job.

At the time, I was required to go to the health department and watch a film. The film showed garbage including food waste breaking down with bacteria multiplying exponentially while leaving excrement in its wake. The decomposition/bacteria excrement odor is a clarion call to vermin(rodentia) and insects. Garbage/trash containing any organic/food matter will begin to break down and send out a massive "soups on"/"dinner ready"/"come and get it" signal to bugs, mice and rats both near and far. (Composting can work in single family homes and in the city if there are community drop-off sites, but not inside or outside of central city residential or commercial buildings as many people are not neat and it will draw bugs/rodents to the area by their inattention to maintenance and unsanitary conditions).

SO, when this proposed rule change was advanced, I wondered if the people writing the rule knew what would happen if it was actually implemented.

If you make this rule law (and if we were in a position physically and financially to follow it) - you would force us to keep the smelly garbage inside our buildings with the children and seniors for a longer period of time. In many cases it would be stored in the basement which is conveniently adjacent to the rat tunnels whose veins course throughout the city. This will give additional time to nocturnal rodents to snoop around in the dark basements for the nourishment that we provide to them so they can multiply. Or, we could store it in front of our buildings in wooden, plastic or metal containers. Then the rats would not be at the curb or in the basement, they would be right at the building facade near the front door. People walking by love to help by adding to the piles of trash including sugary drinks, dog poo and fast food leftovers placed in the open right on the lids. Not at the curb, but leaning on the building just a few feet from where you are proposing to keep the sidewalk clean.

Unfortunately, your well-intentioned proposal is similar to moving the deck chairs on the Titanic. But in NYC parlance, it's almost exactly the same as Three-Card Monte or a shell game. Hey, rats - can you find the garbage? Is it by the curb? How about the basement? No, it's over here - in front of the building. You are almost literally sweeping the problem under the rug. Less rats by the curb, more rats by the kids, especially the less advantaged and lower income.

Possible Solutions -

Be the "no garbage mayor". No other city official has ever succeeded in taming the trash. Do it because you can. You self-cured diabetes. You reinvented ice cream (it's really good :). You fought injustice from the inside and won many victories. Beat garbage because you can -

Here's how:

After police/fire/safety, prioritize garbage near the top of the budget. I was sent on a field trip as a kid to the Staten Island Zoo. I think that kids (especially less-advantaged kids with limited building workers) would much prefer that the city would have collected all the smelly trash every day then look at animals in cages for a few hours. Cancel every unnecessary item in every departmental budget. Stop handing out money like candy to win the favor of a lucky few. How about helping millions over decades with permanent infrastructure instead of squandering it on temporary band-aids? Who built New York? Long-term thinkers who cared more about the many in the future than the few today. They built Central Park for people they would never meet. Who is helping the future generations? Put in the infrastructure necessary to remove all the garbage from Manhattan and the urban centers of the boroughs each day. Yes, every commercial and multi-family residential property should have the garbage picked up each day. Our NYC budget is approximately 100 BILLION DOLLARS. The only reason that we have any garbage on the city streets at all is a lack of imagination. You can always find something that

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seems worthwhile to fix, but the trick is to do the most for the most with what you have available.

Additionally, you may not think of it this way, but, you are using each building in NYC as a waste storage and transfer station - and charging us a monthly fee to boot! You are making us store and create unsanitary and unsafe situations for only one reason: You have not made the removal of trash from the city EVERY DAY a #1 priority.

Until you do, the city and its buildings will be unsanitary and the department is a failure. Not the people who work there who are just following instructions - but the leaders, yes. If the city is unsanitary and it is - then the Department of Sanitation cannot be considered successful. This has been the case prior to your administration and prior to the tenure of current Sanitation leaders as well.

Inertia and momentum in an adverse direction can be hard to change. But what good thing has come easy to you or this City? The job of city government is to be facilitators. To set the table so the people can live and work. As an entrepreneur, you already inherently know this. It's not about imposing rules on the citizens, it's about setting the citizens free to create and prosper by making the city safe and clean without fanfare, in a simple programmatic way.

Specifics-

Set up a multi-prong approach with many discrete solutions.

1) Are the Sandhogs done with the water tunnel? Let's start a garbage tunnel. Get them in there to begin to create the infrastructure to add a system similar to the one Roosevelt Island has (but updated). Do something that future generations will be proud of. Just like fios, buildings can connect to it as it reaches their block over time. Every time a building connects, there will be no need to place garbage outside at all.

2) Supplement the pneumatic garbage tubes with garbage trains.

Move some of the trash on currently unused, newly created or existing subway lines that can haul trash to transfer stations. Buy small buildings like the air shaft buildings dotted throughout the city so trucks can pull in - change batteries and dump their trash into a hopper for the next garbage subway train.

3) Lease or buy a landfill site which can contain a large energy co-generation (garbage to power) plant and solar farm. Create an RFP that will only be responded to by municipalities that want us there - no nimbys. It can use the trash to generate electricity and the solar farm can create and store energy in a battery farm that can power electric garbage trucks that go there and back with no pollution. Maybe Elon Musk can help regarding the electric garbage trucks/solar panels/storage batteries and even the tunneling. Be bold! He's busy, but if you think he won't take a call from the mayor of New York, guess again.

4) Add more trucks to the "Avenues". We need to pick up trash from the corner waste baskets on a constant and consistent basis. We WANT people to throw their trash in there - otherwise they just throw it on the street. This is not a job that is ever finished. It's an ongoing and never-ending task. Right now it's an embarrassment that they get full and overflow. The reason people sometimes throw their own trash in there is that they are forced to store rotting garbage in their home, business or basement like animals (actually animals don't usually live with their garbage, perhaps with the exception of pigs). We need to pick up all the corner garbage all the time. The city looks highly dysfunctional to residents and visitors alike. You mean in 2022 we can't keep the trash cans on the corners clean? Yeah, actually we can if we apply focus to the issue.

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5) Consider supplementing DSNY with outside vendors. Pay everyone in DSNY what they were promised and keep the existing employees, but there may be a need for outside help as well to achieve all the goals related to moving the city to the next level in this area. Remember, after the garbage is picked up each day from Manhattan and other urban city centers, there will be much less garbage for anyone to pick up each day. Less garbage in the buildings and less garbage in front of the buildings. So, we'll need some flexibility in terms of scaling up and scaling down depending on the garbage flow. I don't think we can hire additional permanent city employees for this because we will need significant scheduling flexibility. This flexibility is easier to achieve through a vendor process which identifies this requirement up front than it would be to do this through the maze of civil service rules.

6) Buy, lease or convert an existing motor-home type vehicle for use as a mobile Mayoral daily command center. You may already have such a vehicle.

This command center should allow you to conduct all your regular Mayoral business whilst visiting every block in the city. This may not be an every day exercise for you based on your schedule but we are in a mobile-first society, so accomplishing work on the fly is a part of the new reality. You should be accompanied (in their own trucks) by a recycling and trash team (including a rotation of Sanitation Department leadership). It is likely that by their attendance and help, the DSNY will gain a tremendous amount of information from this daily activity which they can convert into actionable ideas to improve cleanliness and service. Each block that you go to could have all the street/sidewalk trash picked up by your team as you visit with some of the merchants and residents. You may want to personally let them know that you and your team are doing some cleaning today on their block and thank them for anything that they can do to help in the future. As you move through the city block by block, I believe that you and your constituents will derive immense pleasure from the immediate results of your/their efforts. Put out a call for a rotational part-time volunteer brigade to accompany you to help clean up the blocks that you visit. You may be surprised how many people want to help keep the city clean. My guess is that your team will have more volunteers than you can use each day. Especially in underserved and lower-income areas, this will show that you care and may inspire residents and businesses to continue the clean-up effort even after you're gone. Leadership is needed in this area and is best provided by you. What makes people feel good about themselves and their city is real, tangible, highly visible PROGRESS. Getting something done, not talking about it, doing it.

Do NOT include anyone on the team whose job it is to hand out "violations".

This is a goodwill and inspirational accomplishment tour. If you knew how the people felt about a department that does not meet basic standards sending enforcement officers (whose salaries are paid for by the citizens) out to charge citizens for minor rule infractions as the judge, jury and executioner, while they leave the cities cleanliness in its current state, you'd find a way to stop it now.

7) Part of your new proposed rules include the use of containers. Containers like garbage cans roll around the streets, are stolen, look horrible and add significantly to noise complaints. They wind up making the street look like something from the 1920's. People chain them to the railings and they become dirty almost immediately. They also mean that everyone (especially buildings with little or no staff) need to make additional trips to try and find the containers and lock them up. But they don't know when to go back to the building because they can't be sure when the garbage will have been picked up. Containers and sheds like those in front of most smaller midblock buildings are a harborage for rodents. Please don't ask for more containers. They are almost immediately food encrusted and dirtied by passersby and residents alike despite efforts to maintain them. Please don't ask us to store trash in or around our homes and businesses. Take away the trash every day so citizens can live their lives in dignity.

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Please don't make this more complicated than it needs to be. Until the new infrastructure is ready and instead of the new proposed list of rules and regulations, how would this be?

- 1) We place our garbage in black bags by the curb every day from daybreak until 9AM.
- 2) You pick up the garbage every day by 3PM

No garbage in the buildings, no garbage out at night when nocturnal creatures roam, no dirty containers, smooth traffic flow due to limited amounts of trash each day as it is spread out over the week, less noise-peace.

Thanks for your consideration,  
Rich