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## **COMMENT ON PROPOSED RULE FOR TIME FOR PLACING SOLID WASTE AND RECYCLABLE MATERIALS OUT AT THE CURB FOR COLLECTION**

**Gabriela Sandoval Requena, Sr. Policy Analyst**

**November 18, 2022**

Thank you, Commissioner Tisch for the opportunity to comment on the Department of Sanitation's proposed rule on behalf of New Destiny Housing.

Founded in 1994, New Destiny Housing is a New York City-based nonprofit committed to ending the cycle of violence for low-income families and individuals experiencing homelessness and domestic violence. We build and manage supportive, affordable housing and through our rapid rehousing program, HousingLink, we connect survivors with safe, permanent housing. New Destiny also advocates for housing resources for domestic violence survivors and their families. We are a member of the Association for Neighborhood and Housing Development (ANHD).

As an affordable housing developer and operator, we urge you to strongly consider our input as the administration makes changes to the regulations affecting the hours property owners and managers are able to place trash at the curb for collection.

While we support efforts to mitigate rat infestations throughout the city, the approach presented by the proposed rule would disrupt everyday management and tenant services and cause financial hardship for nonprofits operating affordable housing. Inflation, increasing interest rates and insurance premiums, and reduced rent payments during the COVID-19 pandemic are just some examples of the economic headwinds we are faced with. Limiting the times residential buildings can place trash curbside will represent an unfunded mandate and will force us to extend hours or hire additional staff, which implies additional expenses. Nonprofit landlords already operate on extremely thin margins. We urge the administration to grant special consideration and assistance to those who develop and manage permanent affordable homes for New Yorkers in need. This support can be in the form of waivers that allow for flexibility, special funding to hire additional staff, and lidded receptacles for solid waste and recyclables free of charge.

New Destiny echoes ANHD's concerns that the proposal will negatively impact the rate at which affordable housing is created in the city. This policy will increase the cost to operate buildings and lead to the decrease of total number of new affordable units over the coming years. Given how much of a priority increasing the affordable housing stock is to the administration, we strongly urge you to consider the feedback of nonprofit developers and operators on this proposed rule.

We appreciate your efforts to address this challenging issue facing our city and look forward to working with you on a solution that balances the interests of these critical citywide priorities. We welcome any questions you may have.

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