



Rent Stabilization Association Comments on DSNY Rodent Mitigation Zones Amendments

November 17th, 2022

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. RSA supports the City and DSNY's commitment to cleaning up New York City streets, however, rodent mitigation programs throughout the boroughs should be further amended.

We understand the desire for change. Rodent complaints have reached record highs in 2022 and continue to be an issue throughout the city. Changes need to be made and efforts by both building owners and DSNY in unison are how such improvements will be achieved.

There is a discrepancy between the proposed rules for residential buildings and commercial buildings that should be further addressed to create a more integrated residential and commercial waste program. The Department will collect waste from occupants of residential buildings and commercial waste in the same building will be picked up by commercial carters at varying times. Adjacent buildings at yet another. With all the different schedules established for types of residential and commercial waste, collection time will be inconsistent. Waste will always be idle before collection and rats will continue to feast. The Department should reconcile the time that all waste is collected to minimize the number of hours it is out.

Waste in the same area should be picked up altogether, regardless of who it belongs to. The rodents cannot tell time. While set out times attempt to resolve the issue, ultimately to make sure that collections are going to be staffed in such a way that waste is removed quickly, limiting the amount of time that any is out, will be most effective. For many buildings, evening set out will be challenging. Keeping waste inside on premises for longer periods will only drive the problem inside and spread the rodents' search from place to place. While we agree in theory, a better solution would be an opt-in option for those that can adhere to evening pickups. An opt-in option will ensure that DSNY can remove waste by midnight, and residential and commercial buildings will have waste sitting out for less time.

Not only is there an inconsistency between residential and commercial rules but also within the standards being established for residential pickup. The Department should amend the schedule for multiple dwelling units and to whom it applies. To give all buildings no matter the size the opportunity to opt-in for later scheduled set out. While RSA does not object to limiting the amount of hours waste is out, waste kept in receptacles should be included. But while receptacles may conceal the rodent problem, it can be understood that buildings using the DSNY-provided

receptacles will be doing so because of pre-existing sanitation and hygiene violations. These areas may already be established headquarters for rodents, and removing all waste as quickly as possible will help curb the problem.

The Multiunit Building Collection program should be expanded to optimize the proposed beyond buildings with nine units or more, to include those with less than nine units. We support early morning set-out time, with the inclusion of greater flexibility for set-out shifts to support multifamily buildings. Consider small building owners who are likely to struggle with an early morning set-out time. For the buildings with nine units or fewer, most often there is no staff other than the building owner themselves. If buildings' cannot put their waste out to make these schedules, stagnant waste will continue to be an issue. The simple solution would be to have all waste put out by 7:00 am and collected within a six-hour period for all buildings. Just as waste should not be out for more than four hours before collection, it should not exceed more than a certain amount of hours before being removed.

Amending the proposed rule to be more cohesive and consistent will more effectively mitigate rodents in the city. RSA respectfully requests that the proposed regulations be attended to following the comments set forth above.