**Comment on Proposed Rule for Time for Placing Solid Waste and Recyclable Materials Out at the Curb for Collection**

November 18, 2022

Dear Commissioner Tisch,

My name is Claire Hilger, and I am the Deputy Director/Chief Operating Officer for the West Side Federation for Senior and Supportive Housing (WSFSSH), a community development corporation (CDC). WSFSSH provides housing and services to some of our City’s most vulnerable residents, seniors with low incomes, many of whom have histories of mental illness, substance abuse and homelessness.

***Support Needed***

While we support efforts to implement policies that mitigate rat infestations throughout the City, we are concerned about the impact of the proposed time changes. Delaying the time buildings can place trash curbside will function as an unfunded mandate and will force us to extend hours or hire staff – both of which require money. As an operator of affordable housing, we voluntarily opt to sign regulatory agreements that limit our ability to raise rents because we believe that New Yorkers have the right to affordable housing. By voluntarily limiting our income, we have less money to cover unfunded mandates like this one. Please provide us with the support we need to help the City control its rat problem which impacts all of us. **Provide us with rat-proof bins** at no cost. Consider a **fee on restaurants to provide outdoor dining**. **Proceeds of the fee should go to community development corporations** like ours who cannot afford this additional cost.

***Impact on Lives of Residents and Staff***

We will have to change the schedules of staff to comply with this new mandate. Assuming an 8-hour workday, this would create a scenario where building staff are rarely, if ever, available to residents during mornings given a typical shift would have to generally start much later so that the evening garbage removal rule could be adhered to without triggering overtime thresholds. If we are accepted to the early morning option, staff would leave much earlier, meaning tenants would not receive services during the day. This harm would likely only be felt by low-income residents like ours who live in buildings that are unable to fund increased staffing costs. This will also impact our maintenance staff who will suddenly find themselves commuting to work at odd hours. We expect some of our maintenance staff will opt to find another job that does not require them to ride the subway at 4 am and allows them to drop off their kids at school and daycare.

***Composting***

We strongly urge that you roll out this program at a later date in conjunction with composting City-wide. Composting has the greatest potential to make a true and lasting impact on the rat problem. At a minimum restaurants should be required to compost. By placing food waste in rat proof containers for composting, the City would remove the main food source for rats, and really attack this issue at its heart.

We appreciate your efforts to address this challenging issue facing our City and neighborhoods. We look forward to working with you on a solution that balances the interests of these extremely important citywide priorities.