[](https://www.google.com/imgres?imgurl=https://www.perfectionautoworks.com/wp-content/uploads/2016/09/no-pack-rats-tucson.jpg&imgrefurl=https://www.perfectionautoworks.com/rid-a-rat/&docid=k4GNU-iOpFVTCM&tbnid=jtzOiGqagc6qAM:&vet=1&w=250&h=239&bih=784&biw=1857&ved=2ahUKEwjOzrmGo4DkAhWtuFkKHeVBApQQxiAoC3oECAEQLg&iact=c&ictx=1)**The Prospect Heights Rat Task Force**

**To: ResolutionComments@health.nyc.gov**

**Re: Rat Mitigation Zone Hearing**

My name is Carol Morrison and I am writing in support of the proposed Rodent Mitigation Zone rules. However, as a resident of Prospect Heights and as a member of the Prospect Heights Rat Task Force. I urge you to amend the neighborhood boundaries of the Mitigation Zone to **include Prospect Heights (zip code 11238),** **in its entirety.**

The Rat Mitigation Zone must include Prospect Heights’ 11238: this community is severely infested with rodents. Of particular concern are three densely populated blocks—extending from Eastern Parkway to Sterling Place between Washington and Underhill Avenues (with dubious distinction given to St. Johns Place). This section of Prospect Heights has a high concentration of privately owned apartment buildings regrettably operated by grossly negligent or absentee landlords.

This specific area within Prospect Heights has other challenging features: it has fewer co-operatives, some HPD buildings, and many storefronts, all of which contribute to the neighborhood’s chronic rodent infestations. The unprecedented number of 311 calls, decrying rodent activity in this neighborhood, attest to the severity of the problem, but does not fully explain it.

The map of Prospect Heights on the NYC rat portal <https://a816-dohbesp.nyc.gov/IndicatorPublic/Rats/> makes it clear that this area is far more than a problem site: it has many rat reservoirs—places where rats can breed in huge numbers—like the unique vacant passageways connecting our backyards and streets. These passageways, along with infested tree pits, open wire baskets provided by New York’s Department of Sanitation, and *overflowing* refuse from local restaurants with outdoor dining huts (without enclosed flooring)—a phenomenon of the pandemic—have contributed to an exponential increase in the rat population.

**Eastern Parkway, Lincoln Place, and *especially* St. Johns Place between Underhill and Washington Avenues are plagued with serious infestations**.

After three years of isolation caused by COVID-19, residents, like me, are once again outside only to find themselves confronted by vermin. *This situation demands the rat-fighting measures offered by the Rat Mitigations’ preventative interventions and enhanced compliance mandates. Specifically, this initiative can force property owners to comply with sanitation regulations and fine those whose properties fail inspections within The Rat Mitigation Zone. This proposal also ensures the coordination efforts of related city agencies.*

We have many bad actors in our community: One frequent offender located at 392 St. Johns Place. This particular rental facility had its most recent inspection by the NYC Department of Health and Mental Hygiene (DOHMH) on March 15, 2023, and 80 other visits by the same agency since 2015.In sum, those who oversee this property are notoriously remiss in their duty to provide adequate (hole free and lidded) refuse collection and extermination services. When I walk by 392 St. Johns Place, I see multiple rat burrows throughout what would be their front lawn. This lack of civic responsibility is not unique to 392; there are many other offenders, most notably the managers of the properties located at 364 and 369 Lincoln Place. Here, too, open rodent burrows are clearly visible. But two buildings located at 95 Eastern Parkway and 326 Lincoln Place act as the “mothership” for rats. These dwellings are connected by a pathway that allows rats to move freely through Lincoln Place. The apartment building at 95 Eastern Parkway is perhaps more than a mothership: it’s an aircraft carrier! **These pathways must be exterminated on a regular basis, yet no one is taking responsibility to provide this essential service. In the absence of regular extermination, the rat population increases exponentiall**y.

**When I say exponentially, I’m not being hyperbolic.** Female rats go into heat every five days. Their heat cycle begins in the evening and lasts all night. The fertility of rats lasts until the age of 18-24 monthswhen they enter menopause. If rats have mated successfully, the average gestation time is 21-23 days. Females can become pregnant again two days after giving birth. In other words, female rats can become pregnant every month, all year-round, giving birth to as many as 18-20 pups in a single litter. In three years, a female rat can give birth to approximately half a billion pups.https://misfitanimals.com/rats/rat-reproduction-and-breeding/

**The above-mentioned section of zip code 11238 is also beset by absentee landlords.** Without the enforcement of NYC’s sanitation laws, these absentee landlords remain unwilling to address the rat-infestations in the buildings they own and profit from. The calculation they make is both simple and cynical. It is cheaper to pay the rare, and ridiculously low, fine issued by DOHMH or DSNY than to maintain their property and keep it rat free. Even cleaning the garbage area with bleach or water is viewed as too much of an expense. My commentary is factual. For the past five years I have watched these landlords neglect their properties with impunity.

People living in the neighborhoods I’ve described have been reporting an astounding number of rat sighting. That has been substantiated by DOHMH’s city inspectors who have documented twice as much rat activity in 2022 than in previous years. Thus far, the city’s policy on rat mitigation has been an abysmal failure.

Going forward, the Municipal Rat Management Program must implement a more effective policy; one that shortens the period between the issuance of DOHMH’s abatement notice and their taking responsibility for placing rodenticide baits and other forms of rodent control in affected communities. This would mean including resources, funding and abatement purchasing dollars, including an increase of inspectors to DOHMH. The very capable leadership of Ms. Caroline Bragdon, Director of Neighborhood Interventions for Pest Control Services, New York City Department of Health and Mental Hygiene has supported the Prospect Heights Rat Task Force but what is required, is to provide her office with funding, real dollars and real science to study what works, and implement pilot projects to test interventions for efficacy.

As we all know too well, rat reproduction rates are staggering, and global warming will only increase the length of their reproduction season. So, let’s act now! We honor that Mayor Adams has appointed Jessica Tisch, Commissioner of the New York City Department of Sanitation, and Ms. Kathleen Corradi, City-wide Director of Rodent Mitigation. Please know that the Prospect Heights Rat Task Force offers our area as a walk-through to share our experience as –people on the ground—who can identify opportunities and barriers to creating a viable strategic inter-agency coordinated plan for rodent mitigation.

**In closing I ask again that the City Council advocate to extend the boundaries of the proposed Rat Mitigation Program in Prospect Heights. Clearly, it must include the most densely populated blocks from Eastern Parkway to Sterling Place between Washington and Underhill Avenues.**

It is my belief that a truly effective Rat Mitigation Program requires a multi-departmental collaboration. This collaboration must be able to: inspect buildings with garbage problems, share the NYC database to investigate complaints about rat sightings, and hold to account landlords and property owners who violate sanitation laws.

Thank you for your time and attention to this matter.

Sincerely,

Carol Morrison LCSW, CASAC M.C., Prospect Height Rat Task Force

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