



### **Intro. 459**

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. We thank the Committee for giving us the opportunity to submit these comments on Intro. 459, which would allow for the establishment of rat mitigation zones and mandate the hours buildings with nine or more units can put materials out for collection.

Rats are abundant in areas where there is excavation and construction, road work, vacant lots, open spaces, sources of food and a general lack of cleanliness.

We support the idea of establishing zones in which extermination measures are comprehensive, targeted and coordinated to eradicate rats in problematic zones, where efforts are undertaken to eliminate burrows and food sources, bait and clean. Without joint and targeted efforts, rats will migrate from property to property and block to block and, without a widescale approach, individual buildings can temporarily manage a problem but without coordination, it is sure to recur.

We do not, however, support the creation of limited hours, from 4 am to 6 am, as the time during which garbage can be placed out for collection for buildings with nine or more dwelling units. This creates two major issues. First, this would present a serious logistical issue for private owners of residential buildings. Most private buildings do not have overnight staff; it would be nearly impossible to meet this very limited middle-of-the-night window. Second, rats, for the most part, are an outdoors problem and are not an interior building issue. But keeping trash indoors for extended periods will drive the problem indoors as rats search for food. Additional onsite garbage storage would foster conditions that could create an interior building issue.

Accordingly, the RSA supports the creation of rat mitigation zones and opposes the limited hours for collection placement.