



THE CITY OF NEW YORK  
MANHATTAN COMMUNITY BOARD 3  
59 East 4th Street - New York, NY 10003  
Phone (212) 533-5300 - Fax (212) 533-3659  
www.cb3manhattan.org - info@cb3manhattan.org

Gigi Li, Board Chair

Susan Stetzer, District Manager

**City Council Oversight: Sanitation and Recycling Practices at NYCHA Developments  
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Susan Stetzer, District Manager, representing Community Board 3 Manhattan

The Community Board 3 district is designated by DOH as an UAR area (urgent action required). CB 3 has an overall rodent problem, and we have a large number of NYCHA developments (14,500 NYCHA units). This is over 26% of the NYCHA units in Manhattan and 8% of NYCHA units citywide. Many NYCHA developments, like our parks with serious problems, have land where rodents can burrow and they are densely populated, and therefore generate a lot of garbage. It is therefore not surprising that we have a serious rodent problem on our NYCHA properties. Our residents don't complain in numbers corresponding to the problem, but we have been working very closely with DOH for the last three years, and DOH has inspected many NYCHA sites through the neighborhood rat indexing program, and has indexed the entire district annually for the last three years. CB 3 has been working very closely with DOHMH since the beginning of the indexing process, particularly after the first indexing results when we were ranked as having the second worst rat problem in Manhattan. We have been specifically working with Caroline Bragdon, who is a research scientist and the Manhattan Indexing and UAR Coordinator. We have also had the good fortune to have Dr. Bobby Corrigan, who is a worldwide acknowledged urban rat expert.

The biggest obstacle in reducing serious problems is holding city agencies accountable when DOH has issued referrals for city-owned properties. The process is for DOH to make referrals to the owner agency when there is a finding of rat infestation. NYCHA has been in the top three agencies receiving referrals from DOH. The City-owned properties are an area of focus for CB 3 because of the number of properties that have failed for rat infestation. There is not a process to hold agencies accountable as there is for private properties. This includes NYCHA. Dealing with rats is difficult—but it seems that NYCHA developments are not receiving the best rat abatement that is possible—and that is not acceptable.

Good Old Lower East Side (GOLES) has been working with NYCHA residents and some developments are beginning to be organized to better report rodent problems. The resident organizing along with the Community Board and elected officials working to coordinate city agencies on this issue has brought some attention and effort and NYCHA has been more responsive recently.

CB 3 has been working closely with DOH for the last several years and encouraging workshops and trainings for residents. DOH has also reported they have trainings for NYCHA staff. CB 3 has taken on the role of coordinating agencies to respond to rat problems, and in 2012 CB 3 hosted a meeting where agencies came together to coordinate response to rodent problems. For NYCHA properties, the impacted agencies are Parks, DOT, and Sanitation. At the time of the meeting, NYCHA reported that their focus was not rats as they were more concerned about bedbugs, and their resources were directed toward the bedbug problem. It appeared that the agency was short staffed and did not have resources to respond in the most effective manner to rat problems.

There needs to be a protocol for agencies to work together as rats obviously do not stay within agency areas of jurisdiction. For instance, we observed rat burrows in a broken curb/street bed. First there was discussion back and forth between agencies as to which agency was responsible. It is DOT responsibility to fix, but it must be reported to DOT by NYCHA. When CB 3 tried to follow up, we were told that we

had to have NYCHA list this as a higher priority, so we went back and forth between agencies to make sure this was reported and then to have the priority bumped up. This was reported by us after the March walkthrough—but we are still waiting for this to be fixed, even though it is a high priority.

We also observed serious problems evidenced by large rat boroughs in Parks property in Baruch and also in a Joint Operated Playground in Wald Housing under Parks jurisdiction. After this observation, both DOH and I reported these to the Parks Borough Commissioner, and these areas are now being baited and there is follow up. But, this depended on random observation by the CB and DOH. There seems to be no protocol to ensure this property is monitored.

NYCHA staff seems to believe the problem is often with residents not disposing of garbage properly. There definitely seems to be tension between staff and residents on this issue and it is not being addressed. DOH conducts staff trainings for pest control staff for all NYCHA properties every year. On March 13 CB 3 organized a rodent walk through with DOH and NYCHA, and elected officials and GOLES, who in turn organized residents who had the first-hand experience of rodent areas. This was at Baruch, but was not about just Baruch—we understood the problems there were representative of problems in NYCHA developments. However, Baruch is significant because it is the largest development in Manhattan with 3,200 units. The walkthrough was extremely productive. I am not the expert—the findings were all pointed out by DOH and I hope that you will have the opportunity to ask DOH to explain the specifics of these issues. I would particularly hope that you would ask DOH about the agency trainings of NYCHA staff and what they observed was followed and what was not.

1. We observed tracking powder along the exterior of buildings. This is toxic and should not have been accessible to the public. NYCHA acknowledged there were no bait stations. DOH always installs bait stations in severe infestations. NYCHA reported that they did not have resources, but the bait stations would soon be provided.
2. Doors and basement windows were open. This allows rats easy access to buildings. Residents reported some buildings in which they would never enter basements because of so many rats.
3. We opened an electric box—and a huge rat jumped out. This should have been monitored for rats and should have been sealed so that rats could not enter. Open boxes not only shelter rats, it allows rats to chew on the electrical wiring.
4. There were stagnant pools of water –hoses from a boiler room were draining water through open windows. Water attracts rats and the open windows bring them indoors so they can penetrate the entire building.
5. Baiting was not implemented properly. DOH has instructed staff in how to bait –but instructions are not followed. We observed bait that was sitting on top of rat burrows. It is poison and should not be visible. Also, to be effective, it should be inserted deep down in burrows.
6. Compactors have been installed in most of our NYCHA developments to help with the garbage problem which is causing much of the rat problem. However, if compactors are not kept clean they feed the rats. There have been many complaints of compactors not kept clean. I have observed this at Riis Houses because it is visible from the Girls Club building across the street. The Executive Director of the Girls Club tells me that until recently the horrible odor from the compactor could be smelled from blocks away.

We have had consistent failures at Riis, Wald, Gompers and Meltzer. The block association on the block near Meltzer complains constantly about the rats from Meltzer.

Inspection results can be found on the NYC.gov rat portal. We also receive District-wide reports from DOH and a yearly rat indexing map. I am attaching one list of failures for rat infestation from DOH. CB 3 has more referrals for rat infestation from NYCHA than other city agencies, which are usually Parks and HPD. So far in 2013, we have 30 NYCHA failures, and they are often the same ones over and over again. CB 3 is confident that with greater resources and attention, there can be much better control of this problem.