

**Testimony of
Gregory P. Anderson, Commissioner
New York City Department of Sanitation**

**Hearing before the New York City Council
Committee on Sanitation & Solid Waste Management
Tuesday, July 1, 2026 1:30 P.M.**

Good afternoon Chair Sanchez and members of the Committee on Sanitation & Solid Waste Management. I am Gregory Anderson, Commissioner of the New York City Department of Sanitation, and I am joined today by Jennifer McDonnell, Deputy Commissioner of Solid Waste Management and by Frank Marshall, Assistant Commissioner of the Bureau of Commercial Waste. Thank you for the opportunity to testify in front of this committee today.

Introduction 75

First, Intro. 75, sponsored by Council Member Nurse, would expand the commercial routing hours for commercial premises during all posted business hours, or from 8:00AM to 7:00PM for businesses without posted hours. DSNY strongly supports this legislation, which will greatly improve the cleanliness of our commercial corridors.

Currently, DSNY's enforcement of dirty sidewalks and curblines is restricted to two one-hour periods per day. For commercial properties, this limitation prevents DSNY from performing effective enforcement for some of the worst actors — those individual scofflaw businesses that can mar the appearance of an entire commercial corridor. This legislation would allow for consistent enforcement during a business's posted operating hours.

Our goal is never enforcement for enforcement's sake alone. Nor for the sake of revenue, for that matter. Our goal is and always will be to achieve compliance, particularly among repeat offenders. DSNY's outreach and business engagement staff work closely with our partner agencies, business improvement districts, chambers of commerce, and other stakeholders to ensure that education remains our first tool to achieve that compliance and to give NYC businesses the information and tools they need to comply with longstanding basic sanitation laws.

All property owners have a responsibility to keep their sidewalk and property clean, and DSNY is grateful to Council Member Nurse and Chair Sanchez for their leadership in advancing this important bill.

Introduction 353

Intro. 353, sponsored by Council Member Nurse, would require the creation of a Commercial Waste Zones working group. For the last decade, as DSNY has studied the commercial waste industry, designed the proposed commercial waste zones system, worked with City Council to enact legislation authorizing such a system, and embarked on the implementation of commercial waste zones, DSNY has regularly engaged with stakeholders representing the broad array of carters, businesses, advocates, residents and others with an interest in the commercial waste

industry. They have provided and continue to provide invaluable feedback and guidance as we have brought this program from long-discussed concept to actual functioning system.

DSNY conducts extensive customer engagement before, during, and after each zone transition. Across the first four phases of implementation, our Commercial Waste team sent more than 156,000 mailers, made more than 64,000 telephone outreach attempts, visited businesses nearly 52,000 times, held 23 information sessions and met with 129 business improvement districts, community organizations, elected officials, and other local partners.

The Department regularly engages with each of the CWZ awardees before, during, and after each zone transition to discuss customer engagement, service, pricing, safety, compliance, data quality, and other implementation matters.

In addition, Local Law 199 established the Commercial Waste Zones Safety Task Force, which includes representatives of DSNY, DOT, BIC, the commercial waste industry, and individuals with workplace-safety expertise. Since late 2021, DSNY has convened twelve meetings of the Safety Task Force to review industry conditions and best practices and to discuss recommendations concerning worker safety, public safety, training, and vehicle operations.

Taken together, these established channels provide ongoing review, participation, and input for a wide variety of stakeholders consistent with the objectives of Intro. 353. We welcome the opportunity to conduct additional engagement through a more formalized working group and plan to do so whether or not this legislation advances. We will work closely with the Council to plan the appropriate composition of such group and look forward to future conversations.

Introduction 356

Intro. 356, sponsored by Council Member Nurse, would require DSNY to adopt rules to permit any community partner to charge for the collection of organic waste at a drop-off site and to sell compost to the public.

DSNY rules currently do not prohibit community composters from charging for collection of organic waste at a drop-off site or from selling compost to the public. Previous DSNY contracts with specific partners did prohibit programs funded by the City from charging for these services. However, as these programs are no longer baseline funded, these restrictions no longer apply.

Many of the organizations that operate both drop-off sites and community composting sites currently do, however, receive substantial City funding allocated by the Council. Any change to the operation of these publicly-funded compost programs should seek to balance access, equity, and the financial sustainability of those organizations for the benefit of the broader public. We look forward to working with Council to better understand the intent of this legislation.

Introduction 367

Intro. 367, sponsored by Council Member Nurse, would require DSNY to accept commercial waste at the City's transfer stations. While we oppose the bill as written, the Department has committed conceptually to the acceptance of commercial waste at the City's transfer stations in

both the 2006 final and the 2026 draft Solid Waste Management Plans, and the permits for these facilities allow them to accept commercial waste.

As we have said previously, we plan to begin this process after we complete full citywide implementation of the Commercial Waste Zones by the end of 2027. We look forward to continuing this conversation as we approach full CWZ implementation next year.

Introduction 369

Next, Intro. 369, also sponsored by Council Member Nurse, would require DSNY to establish one or more organic waste composting facilities in each borough with the capacity to process at least 180,000 wet tons of organic waste annually. While DSNY appreciates the Council's interest in expanding processing capacity citywide, we oppose the bill's requirement for compost facilities in each borough given regulatory, operational, and fiscal realities that would make implementation impossible. We would be happy to have further conversations with the Council about expanding composting processing capacity.

Introduction 911-A

Finally, Intro. 911-A sponsored by Council Member Carr, would increase the number of carters in the Staten Island commercial waste zone from no more than three to a total of six and delay the implementation of such zone. DSNY opposes this bill, as it would undermine the Commercial Waste Zone program's core benefits of decreased truck traffic, improved safety, and strengthened customer protections. We cannot support such a disruption to this system in the midst of implementation — Staten Island zone implementation starts today — nor do we support depriving Staten Island residents and businesses from the clear benefits this program provides.

Thank you for the opportunity to testify before you today, and I would now be happy to answer any questions.



OFFICE OF THE BROOKLYN BOROUGH PRESIDENT

ANTONIO REYNOSO

Brooklyn Borough President

**City Council Committee on Sanitation and Solid Waste Management
Hearing on Commercial Waste Zone and Organics Legislation
June 30, 2026**

Good morning Chair Sanchez and thank you for holding this hearing today. My name is Erin Wright, and I'm here representing Brooklyn Borough President Antonio Reynoso. He appreciates your ongoing attention to the rollout of Commercial Waste Zones (CWZ), a program he created during his time in your position.

When fully implemented, this program will address myriad issues with the private carting industry by:

- limiting vehicle miles traveled;
- increasing enforcement of dangerous driving;
- incentivizing the replacement of out-of-date fleets;
- requiring more attention to worker safety; and
- increasing diversion of waste from landfills.

Despite unfortunate delays and our continued calls for DSNY to speed up the program's rollout, BP Reynoso has been pleased with its implementation so far. Initial information indicates that increased enforcement in the active zones is leading to improved safety outcomes, that more workers now have union protection, and that the program has not caused costs to rise dramatically, as some had predicted.

I am here to provide comments on the three bills being heard today related to CWZ, as well as Intro 369 on expanding traditional organics processing in the five boroughs.

Intro 353 would create a CWZ Working Group. The Council has been considering this bill for many years, and it's time to finally pass it. Having experts at the table from both within and outside the industry can only help guide the process and ensure its continued success.

Intro 367 would require DSNY to establish a plan for accepting commercial waste at the Marine Transfer Stations (MTSs). BP Reynoso originally introduced this bill when he was still in the City Council, and unfortunately DSNY continues to slow roll this necessary measure, which would remove dangerous and polluting waste trucks from our streets. Thanks to advocacy by the environmental justice community, the MTSs remove waste by

barge and rail rather than long-haul truck. This bill will push DSNY to create a clear plan that will support our EJ communities, and we urge the Council to pass it quickly.

Intro 911-A would increase the number of carters allowed to participate in CWZ in Staten Island. BP Reynoso has concerns about this proposal and the precedent it could set for other zones citywide. The decision to allow three carters per zone was based on balancing the need to provide oversight to a chaotic system with the need to maintain competition within the market. Adding more carters to any zone has the potential to undermine the program's goals as designed. Carters who DSNY did not select are not shut out of the process entirely – each awardee can subcontract with up to three businesses, leaving opportunities open. This bill is at best unnecessary and at most actively harmful to the program, and should not pass.

Unrelated to CWZ but also of high priority to BP Reynoso is **Intro 369, which would require the City to establish traditional composting facilities in each borough.** Right now, much of the organic waste collected curbside is sent to the Newtown Creek Wastewater Treatment Facility to be codigested with wastewater. While any diversion from landfill is better than none, traditional composting is preferable to codigestion. This is because anaerobic digestion creates two byproducts: biogas and biosolids. Biogas is primarily methane, a greenhouse gas that gets burned into the atmosphere if it is not captured for reuse. Biosolids are the solid byproduct of processed sludge. According to DEP, New York City produces about 1,400 tons, or 1,600 truck loads, of biosolids *per day* at its wastewater treatment plants, and much of it ends up in landfills. There are also major concerns that these biosolids are contaminated with PFAS, also known as “forever chemicals.”

Traditional composting, meanwhile, creates soil amendment the City can reuse in its parks and street trees, and these facilities create jobs and support community engagement. Intro 369 would also ensure that these facilities are sited equitably around the city, rather than the current situation, which concentrates truck traffic in North Brooklyn, counter to the goals of previous legislation supporting waste equity. I am attaching our report *Expanding Composting in New York City: The Case for Passing and Implementing Intro-0369-2026*, which goes into more detail about the need for this bill and creates a methodology for identifying siting opportunities citywide.

Thank you again for holding this hearing today. We look forward to continuing our work with you to monitor the rollout of CWZ and to support efforts to keep organic waste out of landfills.



Expanding Composting in New York City:

The Case for Passing
and Implementing Intro 369-2026



Expanding Composting in New York City:

The Case for Passing
and Implementing **Intro 369-2026**

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Introduction

About one-third of the approximately eight million tons of waste that New Yorkers produce every year is organic material, including food scraps and yard waste.

This material traditionally travels from our homes and businesses by truck to landfills or incinerators, where it becomes the most significant contributor of waste-related greenhouse gas emissions.¹

While as of October 2024, the New York City Department of Sanitation (DSNY) has now fully implemented a citywide curbside organics collection program, which incentivizes residents to separate their organic waste and in turn diverts this waste from landfills, the City can still do more to ensure this waste is processed responsibly.

Intro 0369, Sponsored by Council Member Sandy Nurse, would require DSNY to ensure that there is a minimum cumulative annual aerobic processing capacity of 180,000 tons of organics in each borough, inclusive of all public and privately-managed compost sites in that borough, including existing facilities. DSNY can achieve this through establishing any number of City-owned, operated, or contracted sites. The additional capacity needed to reach 180,000 tons will vary greatly by borough based on what facilities already exist.

The bill seeks to ensure that New York City processes its organics through a local and resilient composting network, rather than the capital-intensive investment associated with anaerobic co-digestion. Facilities may be of varying sizes, employ distinct composting methods, and be for-profit or non-profit. Material for these sites would be primarily sourced from the new citywide residential organics collection program, as well as from Smart Bins, food scrap drop-off sites, and significant yard waste generators. Accepting commercial organics is possible as their separation becomes increasingly mandated.

Historically, the public and private sectors have had difficulty siting composting facilities in New York City. Through research, we developed a methodology for a land survey to identify potential sites. The methodology, mapping, and individual site analysis are included in this document, as well as a policy brief exploring the environmental and economic impacts of Intro 369-2026.

¹ Recovering Organics. NYC Mayor's Office of Climate and Environmental Justice (2024, September 4).

Processing Organics

In NYC, the diversion of the organic waste stream from landfills and incinerators has lagged behind plastic and glass recyclables.² New York City's full rollout of its municipal curbside residential collection program has the opportunity to change this. Current capture rates are low, but available data does not reflect a fully citywide program because curbside collection just started in Manhattan in October 2024.

The City projects a 50% capture rate (the amount diverted from landfills) for organics by 2050 in its climate budgeting documents. If this projected capture rate is realized, more than 400,000 tons of organics would be diverted from landfills and incinerators each year, and emissions would be reduced by roughly 201,000 tons of CO₂e.^{3, 4} Reaching this number would require significant outreach and education, but it is possible, and would result in a significant reduction of tonnage in the refuse stream.

As of 2021, DSNY spent roughly \$500 million to export waste. Given that 43% of waste in the refuse stream was organics, the City paid roughly \$195 million to contractors to export organics in that year.⁵ As the City continues to increase capture rates for residential source-separated organics, these contract payments will be adjusted downward to reflect these reductions and the associated waste export costs. Local processing of residential food scraps as compost will still require a budget allocation, but processing as compost within the five boroughs will retain that money in the city and route it to local composters, grow the local economy, and create jobs and valuable soil amendments. Waste export to landfill and incinerator, however, would route the same budget expenditure to large, national companies' shareholders, primarily located

outside the city. DSNY has budgeted \$22-27 million for its organics programs in recent years, an amount that is likely to increase as the rollout continues and capture rates increase. The choices the City makes about how to handle source-separated organics could have a negative or positive impact on the local economy far beyond the waste sector.

² [2023 NYC Waste Characterization Study](#)

³ [New York City Climate Budgeting](#). Mayor's Office of Management and Budget.

⁴ This number is disputed. Alternative calculations show a much higher projected reduction. Following a linear increase in projected captured tonnage until 2050 would yield cumulative diversion of 6,500,000 tons. Using the emissions reduction rate from the Northern Tilt study (-.64 tons of CO₂e per ton of "dry" food scraps) would entail a 4,160,000 ton CO₂e reduction.

⁵ [DSNY Budget Analysis 2019-2022](#)

Anaerobic Co-Digestion vs. Traditional Composting Methods

Organic waste can be decomposed through anaerobic or aerobic (composting) processes. Anaerobic digestion (AD) is a process developed for treating organics, manure, or sewage waste, in which bacteria breaks down organic matter in the absence of oxygen. When multiple organic materials such as food waste and sewage are combined, the process is referred to as anaerobic co-digestion.

In its 2023 report *PlaNYC: Getting Sustainability Done*, the City articulated its plan to process the majority of food scraps collected from the curbside program through anaerobic co-digestion. The largest Wastewater Recovery Facility (WRRF) in New York City, Newtown Creek (located in Greenpoint, Brooklyn), recently began processing organics through anaerobic co-digestion. Waste Management processes DSNY-collected organic waste into Engineered Bioslurry at its Varick Avenue facility, and trucks the slurry to the WRRF for processing.⁶

In anaerobic co-digestion, the material is heated and dewatered, producing biosolids (synonymous with sewage sludge) and biogas (methane). Each of these two products, depending on their contamination levels, can be a resource, or a dangerous pollutant. In a perfectly functioning WRRF that supports methane capture and beneficial use of biosolids, methane would be routed into pipes as a renewable natural gas, reducing the demand for energy from less sustainable sources. Biosolids would be applied to land as fertilizer or further composted, acting as a carbon sink and replacing artificial fertilizers and harvested soil. However, at Newtown Creek, the system does not function perfectly.

The New York State Department of Environmental Conservation (DEC)

commissioned a study, released earlier this year and conducted by the consultancy firm Northern Tilt, LLC, to analyze the Greenhouse Gas impact of various scenarios of material fates at Newtown Creek. The study “assumes that all the biogas generated would be cleaned and injected into the natural gas pipeline as Renewable Natural Gas (RNG).”⁷ Under this assumption, when biosolids are applied as fertilizer, or further composted, the process is more carbon-negative than composting.

Researchers at Princeton found that “actual methane emissions from wastewater treatment facilities across the U.S. would be about 1.9 times greater than emissions estimates that use existing IPCC and EPA guidelines.”¹²

However, “flaring the biogas instead of injecting RNG into the pipeline [...] makes both [land application and composting] slightly carbon-positive.”⁸ Methane injection at Newtown Creek was years delayed,⁹ though the City’s Department of Environmental Protection (DEP) reported in May that the facility flared 80% less often during the first four months of 2024 compared to the same period in 2022, before National Grid began its methane capture project there.¹⁰ While the gas may now be making its way back into the energy grid, the system requires a proportionally large amount of material and energy input to produce impactful quantities.¹¹ Furthermore, recent studies have found much higher-than-estimated levels of fugitive methane emissions at WRRFs around the country. Researchers at Princeton found that “actual methane emissions from wastewater treatment facilities across the U.S. would be about 1.9 times greater than emissions estimates that use existing IPCC and EPA guidelines.”¹² This study points to the

need for DEC to reassess its findings in the aforementioned study.

Additionally, facilities doing anaerobic co-digestion have so far encountered difficulty ensuring that biosolids produced have low enough contamination for beneficial use. Currently, all WWRFs in New York City together generate over 1,200 wet tons of biosolids per day.¹³ Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS), a category of forever chemicals that cause cancer, hormone disruption, and liver damage, have been found in high concentrations in biosolids.¹⁴ PFAS finds its way into the wastewater stream through street runoff, water waste from industrial facilities, and chemical reactions that occur during the high-heat process of dewatering.¹⁵ In a literature review written by Arcadis and commissioned by the Department of Citywide Administrative Services (DCAS), officials in the waste sector in Toronto and Chicago shared their concerns, stating that, “PFAS is dominating wastewater discussion in New England into Mid-Atlantic.”¹⁶ For Toronto, the “revenue from selling the biosolids is less than the cost to make it.”

While New York City has not conducted any formal, public testing on PFAS contamination in biosolids, there is no reason to believe biosolids produced here will be PFAS-free. Thus, by sending collected organics to anaerobic co-digestion, the City positions itself in a lose-lose scenario: continue on a carbon-positive path, or apply the toxic biosolids and contribute to the PFAS public health crisis.

New York State and the federal Environmental Protection Agency (EPA) are expected to propose guidelines for permissible levels of PFAS in the coming years; however, scientists believe “there is no level of exposure to these contaminants without risk of health impacts, including certain cancers.”¹⁷ Furthermore, given the Supreme Court’s recent ruling overturning the Chevron doctrine, it is unlikely that these

guidelines will be the final word until fully adjudicated, which can take decades.¹⁸

It is possible to process organic waste using anaerobic digestion without also including wastewater. However, while this may reduce PFAS content in the resulting biosolids, it would be significantly less effective in producing methane than processing with wastewater. Pre-processing is expensive, energy-intensive, requires distinct machinery, and can create odorous volatile organic compounds.¹⁹ Therefore, it entails much of the same investment and siting difficulties as composting, with none of the benefits.²⁰ The City would also have to dedicate digesters to solely handle food scraps, putting a strain on their sewage treatment infrastructure, and potentially reducing the facilities’ energy efficiency.

Composting offers a much more flexible, efficient, and beneficial method of processing organics than anaerobic co-digestion.

^{6, 19, 20} Chang, C. (2023, April 6). *Following the Smart Bin Compost Truck to its Last Stop*. Curbed.

^{7, 8} Carpenter, R., & Carpenter, A. (2024, May 6). *Modeling GHG Emissions From Source Separated Organics*. Biocycle.

⁹ Sophia Chang, S. (2023, November 11). *Project to Convert NYC Compost to Heating Fuel Goes Offline Weeks After Launching*. Gothamist.

¹⁰ Maldonado, S. (2024, May 22). *National Grid Wants to Heat More Homes With Converted Food Waste - and Make You Pay For It*. The City.

¹¹ *DEP, EPA and National Grid Celebrate Innovative Project that Converts Wastewater into Renewable Energy*. The Official Website of the City of New York. (2023, June 14).

¹² Poore, C. (2023, February 28). *Wastewater sector emits nearly twice as much methane as previously thought - high meadows environmental institute*. Princeton University.

¹³ New York City Department of Environmental Protection. (n.d.). *Biosolids Beneficial Use Plan 2020-2030*.

¹⁴ Centers for Disease Control and Prevention. (2024, January 18). *Potential health effects of Pfas Chemicals*.

Anaerobic Co-Digestion vs. Traditional Composting Methods

¹⁵ Environmental Protection Agency. (2024, October 10). *Per- and Polyfluoroalkyl Substances (PFAS) in Biosolids*. EPA.

¹⁶ Wu, J., Allen, S., & Auerbach, E. (2023). *Study on Organic Resource Recovery Towards a Carbon Neutral NYC*. Arcadis. New York City Department of Citywide Administrative Services.

¹⁷ United States Environmental Protection Agency. (2014, April 10). *Biden-Harris Administration Finalizes First-Ever National Drinking Water Standard to Protect 100m People from PFAS Pollution*.

¹⁸ Quinn, M. (2024, August 6). *What the Supreme Court's Chevron reversal could mean for PFAS and labor regulations*. Waste Dive.

Benefits of Local Composting

Organic waste is currently picked up by DSNY trucks and either brought to DSNY's Staten Island Compost Facility, DSNY's Soundview Facility in the Bronx (yard waste only), Waste Management's Varick Avenue transfer station in Brooklyn, or American Recycling's transfer station in Queens. While the DSNY facilities use traditional composting methods, both private facilities export organics for anaerobic digestion – Waste Management for co-digestion at Newtown Creek, and American to an anaerobic digestion facility in Massachusetts.²¹ Intro 369-2026 seeks to increase compost processing capacity within the five boroughs for compost processing through the use of local facilities.

The benefits of processing organics through composting fall into four categories, which will be expanded upon next:

1. Reducing the inequitable and capital intensive distribution of infrastructure
2. Providing revenue from sales of compost generated
3. Creating local jobs
4. Increasing community engagement through co-siting

1. Equitable infrastructure and truck traffic reduction

Intro 369-2026 would significantly reduce the current need to process organic waste outside NYC. Reducing trucking miles would reduce emissions, noise and odor burdens, road wear-and-tear, and pedestrian safety incidents, all while saving the City money. Intro 369-2026 attempts to site multiple facilities across the city, not just for compliance with Fair Share

criteria, and in the spirit of Waste Equity legislation passed in 2018, but also to distribute opportunities.

Local Law 152 of 2018, known as the Waste Equity law, sought to reduce truck traffic from waste facilities in three overburdened communities - North Brooklyn, the South Bronx, and Southeast Queens - by reducing the permitted capacity of waste transfer stations there. According to DSNY, its implementation reduced truck traffic by about 120-180 waste trucks and 60 long-haul trucks per day in these communities.²² Yet at full capacity, Newtown Creek currently can receive up to 500 tons of organics per day, which would translate to roughly 40 additional truck trips in North Brooklyn, traveling from the Varick Avenue facility to the WRRF and erasing much of the progress made. Intro 369-2026 would distribute truck traffic more evenly around the city.

Another significant improvement would be a reduction in the creation of biosolids. While the City has initiated a Request for Expressions of Interest (RFEI) for beneficial in-city use of biosolids, this RFEI only aims to reach around 5% beneficial use,²³ and given the safety issues raised in the earlier sections of this text, this goal may be problematic. Because demand is minimal for biosolids, and what demand exists is largely outside of the city, DSNY would create significant downstream costs by hauling biosolids outside of the city or further processing them into fertilizer or compost. Establishing compost facilities for raw organic material would also reduce the need for trucking sewage sludge to sites for secondary processing.

2. Compost Sales

While biosolids are a contaminated product,

Benefits of Local Composting

the compost reduced from source-separated organics is often applicable in construction projects, parks, street trees, community gardens, and rain gardens. The Mayor's Office of Environmental Remediation (OER) operates the Clean Soil Bank, with multiple sites around

At a market rate of \$40-70 per ton,²⁶ the locally composted material could generate upwards of \$20 million of value each year.

the city, to recycle soil and reduce trucking.²⁴ Despite the city's soil reserves, tons of soil are hauled into the city each year because of the high demand from a variety of sources. This imported soil is costly: organizations pay for transportation, both fiscally, and in GHG emissions. Intro 369-2026's sites, at full capacity of 900,000 tons of organics processing across the city, would yield between 20-30% of this tonnage in higher quality, finished compost.²⁵ At a market rate of \$40-70 per ton,²⁶ the locally composted material could generate upwards of \$20 million of value each year. This value could be realized through revenue from sales, or given to City agencies, reducing their costs. This compost could be used when needed to amend much of the soil provided through the Soil Bank – a cost-effective and healthier way to bolster the City's efforts to expand public greenspaces and pervious surfaces to combat flooding.

This soil, when amended with local compost and applied in and around the city, will not only replace demand for less efficient sources, but will also act as a carbon sink, reducing CO₂ concentration in the atmosphere.²⁷ As City and State governments and other organizations attempt to introduce and develop carbon markets, composters could legitimately sell carbon credits as offsets. This is another potential stream of revenue for site operators or contractors.

3. Jobs

Compost facilities could be a significant source of high-quality, green jobs. High-quality green jobs are those that are spiritually, mentally, and physically enriching and avoid exploitative or hazardous conditions. According to the Institute for Local Self Reliance, compost facilities create 4.1 full-time equivalent jobs for every 10,000 tons of material processed, compared to only 2.2 from landfilling.²⁸ Given this statistic, Intro 369-2026 would create roughly 350 jobs distributed around the city. The proposed legislation also includes a provision that site operators must "perform outreach to persons living within a half-mile radius of a selected site for any organic waste composting facility informing such persons of potential employment opportunities for the construction, operation, or maintenance of such facility." These jobs would be given to New Yorkers, rather than employees of contractors that often process the waste outside of the city. Compared to other waste management jobs, those related to composting have fewer negative working conditions, create more opportunities to learn about the entire process, and engage local communities.

4. Co-siting

It is beneficial and ideal to co-site compost facilities with urban farms and gardens. Co-siting would allow workers to grow local produce and flowers for themselves and their communities. This mutually-grown food could be given to the community at cost at farm stands or donated to food pantries and local community groups.

Intangible Benefits

Compost facilities offer a variety of less tangible benefits, such as bolstering mental health and community building. Beyond employment, local residents can get involved through volunteer work and gardening using the soil. Increased engagement with nature, which is increasingly

Benefits of Local Composting

difficult in cities, is associated with improved focus, better mood, and reduced risk of psychiatric disorders.²⁹ Community access to locally produced, high quality compost allows communities to mitigate toxins in the soils of their green spaces with the technical support from the compost facilities.

²¹ Miflin, C. (2023, June). [What Happens to NYC's Organic Waste](#). Center for Zero Waste Design.

²² [Mayor de Blasio and Speaker Johnson Celebrate Signing of Waste Equity Legislation](#). The official website of the City of New York. (2018, August 16).

²³ [NYC DEP In-City Beneficial Reuse of WRRF Biosolids](#). The City Record Online (CROL) | Notice Details. (2024, February 9).

²⁴ [Clean Soil Bank](#). Clean Soil Bank - OER. (n.d.).

²⁵ Kanarick, E., & Morales, D. (2024, July 22). Conversation with Domingo Morales of Compost Power. personal.

²⁶ Whitney, B. (2024, February 23). [What is the True cost of Compost \(or Manure\) in 2024?](#). Texas A&M AgriLife Organic.

²⁷ Melillo, J., & Gribkoff, E. (2021, April 15). [Soil-based carbon sequestration](#). MIT Climate Portal.

²⁸ Platt, B. (2024, June 14). [Composting makes \\$en\\$e: Jobs through Composting & Compost use](#). Institute for Local Self-Reliance.

²⁹ American Psychological Association. (n.d.). [Nurtured by Nature](#). Monitor on Psychology.

Challenges of Local Composting

Trucking

The most inevitable negative impact of siting a compost facility is the influx of truck traffic. Waste is almost exclusively moved through New York City using trucks, which are dangerous to pedestrians and cyclists; emit exhaust, noise, and odors; and degrade roads. While some composting sites function as drop-offs brought on foot and by bike micro-haulers, many sites identified by this mapping research will require trucks and larger vehicles to transport feedstock.

As noted, Intro 369-2026 will distribute truck traffic more evenly across the city than any other proposed method of processing organics. This report already touched on the traffic generated in North Brooklyn at full capacity of the Newtown Creek WRRF. Sending organics pickups to other limited numbers of digesters, or overly relying on the Staten Island compost facility, would concentrate truck traffic in those areas. Concentrating organics processing in few areas would jeopardize compliance with Fair Share Criteria,³⁰ and while the Waste Equity Law exempts organics facilities, the increase in truck traffic would erase much of the truck reduction progress made since its passing. The ideal system spreads facilities out equitably among the boroughs so no one community receives outsized impacts.

Odor

Waste smells and concerns about odor from local compost are expected and legitimate. Some sites have elicited complaints from neighbors. The New York State Codes, Rules, and Regulations prescribe an “odor control and response plan,” and highlight sensitive receptors.³¹

By managing rainwater and contamination, and properly turning and aerating piles,

odor can be efficiently minimized, to the point where it is virtually unnoticeable. For example, Compost Power has been operating composting sites on New York City Housing Authority (NYCHA) campuses for years, and even in these dense areas, processing meat and dairy, the sites have never received odor complaints through 311 or directly.³² Larger-scale facilities could be harder to manage meticulously, but odor can be controlled and is not a reason to forgo composting at any site.

Rats

Rats are another concern if compost is not properly managed. Food scraps are thought to be the main attraction for rats to compost sites. They certainly appreciate the food, but more notably, rats burrow for warmth in the winter. Decomposing piles can reach upwards of 140 degrees in their center. The most effective way to prevent rats in composting facilities is to limit the rats’ access to the material. The most extreme protections could be accomplished through rat-proof in-vessel systems. For turned windrows and static piles, by composting on top of hard surfaces with gravel buffers, rats will encounter difficulty reaching the site. Compost Power found that employing proven rat mitigation techniques resulted in rats and the tunnels they make moving further from compost sites, decreasing rat activity throughout the area where composting takes place.

Using these composting techniques presents a net-positive opportunity for rat control in the city. Separating organics out of the refuse stream, specifically into brown bins, will make it much harder for rats to feed off the food scraps that would otherwise be left out on the street in vulnerable plastic bags (in areas that have not yet moved to containerization).

³⁰ *Fair Share Criteria: A Guide for City Agencies.*

The Official Website of the City of New York. (1998).

³¹ State of New York. Compilation of Codes, Rules and Regulations Title 6. Department of Environmental Conservation. Chapter IV. Quality Services Subchapter B. Solid Wastes Part 361. Material Recovery Facilities Subpart 361-3. Composting and Other Organics Recycling Facilities.

³² Kanarick, E., & Morales, D. (2024, July 22). Conversation with Domingo Morales of Compost Power. personal.

Envisioning Implementation of Intro 369-2026

Between the large, City-operated sites (Staten Island and Soundview Facilities), and smaller, community-run sites, New York City currently has approximately 40,000-50,000 tons of annual processing capacity for food scraps, and upwards of 120,000 tons including leaf and yard waste.^{33, 34, 35} DSNY has stated on record that Intro 369-2026 would require “90 acres in each borough” for composting.³⁶ The Department reached this number based on their ratio of capacity-to-land used at their Staten Island facility. Intro 369-2026 would require significant land use, but capacity can be increased without increasing footprint. In fact, DSNY recently increase the Staten Island facility's capacity 2000% by changing the method of composting used. Other cities have reached a capacity of 100,000 tons in six acres.³⁷ At this ratio, the bill would only require 10-15 acres in each borough, significantly less than the 90 that DSNY has estimated.

New York State's Department of Environmental Conservation (DEC) regulates all waste processing facilities in New York State. New York City composting facilities would be subject to State Codes, Rules, and Regulations (6 CRR-NY 361-3.2),³⁸ which dictate requirements for permitting, as well as the City's Zoning Resolution, which dictates where facilities can be sited.

Beyond these explicit standards, compost facilities may require a variety of factors to ensure their success. These factors range from access to public utilities to convenience of trucking and drop-off routes.

To capture sites that both meet legal requirements and possess favorable characteristics for the feasibility of large-scale composting, we compiled a list of criteria and shared it with members of the Brooklyn

and Manhattan Solid Waste Advisory Boards for comment. Following their feedback, we stratified the criteria in order of importance to create a methodology. This produced a surveyed map of the city, identifying possible sites, and ranking them based on their feasibility scores.

This methodology aims to highlight sites potentially available for large-scale composting. While the recently passed City of Yes for Carbon Neutrality zoning text amendments allow for composting as-of-right as an accessory use outside of M and C zones, we did not include these in our search, as we focused on potential larger-scale sites to satisfy the goals of Intro 369-2026. It does not recommend a specific type of aerobic processing, which can include turned windrows, aerated static piles, and in-vessel (using a sealed container).

The output of this mapping work aims to highlight a selection of parcels that comply with DEC's basic requirements for compost facilities (6 CRR-NY 361-3.2), are zoned appropriately, and have favorable characteristics for establishing turned windrow, aerated static pile, or in-vessel sites. We attempted to capture more complex factors, such as environmental justice and economics, through metrics in our methodology, but further analysis is recommended. This analysis can be conducted by City agencies, contractors, and facility operators to maximize their capacity and efficiency at each identified site.

Process for Site Identification

Review

The process began with a research inquiry into the history of organics processing in New York City and comparable programs in other North

American cities. This research informed a list of factors for successful composting, specifically in urban and highly-regulated areas. These factors are separate from required regulations for permitting and zoning, which legally bind all organics processing sites.

Feedback

The criteria were shared with the Solid Waste Advisory Boards, as well as New York-based community composters and environmental activist groups. Their feedback was incorporated to formulate the final list of criteria.

Methodology

Based on feedback and interviews, the Land Use team at Brooklyn Borough President Antonio Reynoso's Office collaborated to turn the criteria into a methodology that could be applied to a map of New York City to refine, identify, and rank feasible sites. Included in this work was the processing of qualitative criteria into binary measurables. The first layer of the map highlighted all sites that met the legally necessary characteristics in the 6 CRR-NY 361-3.2, and NYC Zoning Resolution.

Output

Based on research, we determined an appropriate weight for each feasibility factor and scored each site on a scale of 0-1. Sites with a score of 0-.576 were assigned a "low" score, .577-.7 a "medium," and .71-1 a "high."

³³ *From trash to treasure: Ahead of citywide curbside composting, Adams administration expands Staten Island Compost Facility*. The official website of the City of New York. (2024, January 4).

³⁴ *Soundview Composting Facility Annual Report*. Index of /FS/Projects/SWMF/Annual reports_solid waste management facility/annual reports_by activity type. (2019).

³⁵ *Appendix B: Regional Organic Waste Processing Capacity*. The Citizens Budget Commission. (n.d.).

³⁶ Nurse, S. (2024, March 19). Intro 369-2026. New York City. Retrieved August 29, 2024.

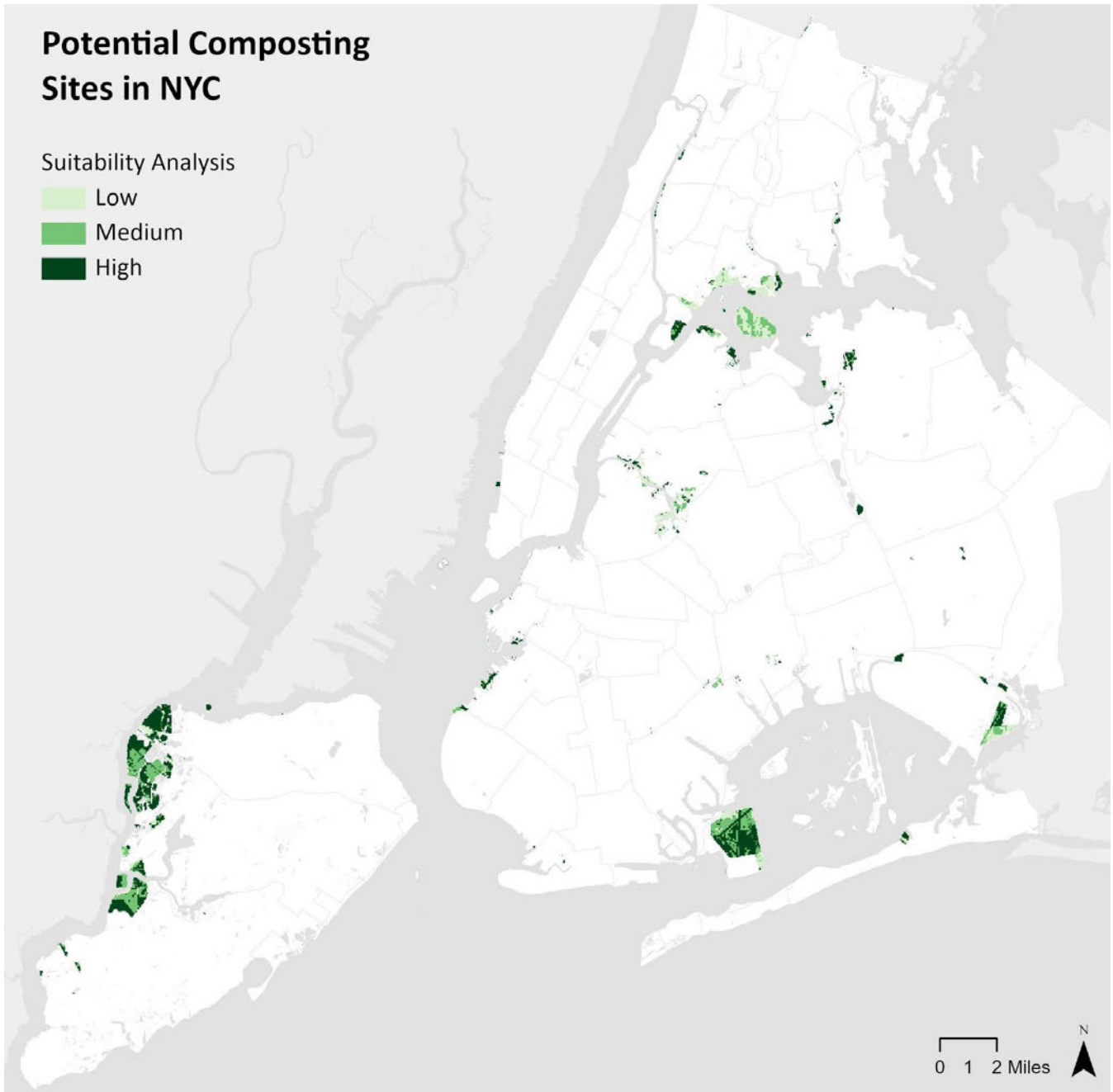
³⁷ *The Calgary Composting Facility*. <https://www.calgary.ca>. (n.d.).

³⁸ 361-3.2 Composting facilities. (n.d.). New York. Retrieved August 29, 2024.

Potential Composting Sites in NYC

Suitability Analysis

- Low
- Medium
- High



Graphic: Tal Litwin

Other Considerations

Environmental Justice

Historically, waste facilities have been sited in marginalized communities, causing disproportionately high rates of environmental health issues, and odor and noise burdens. Thus far, we have explored the potential negative impacts of siting compost facilities in dense urban areas. While compost sites cause fewer health impacts and generate more employment opportunities than landfills, incinerators, and co-digestion, areas with significant existing environmental burdens should be considered for compost siting with increased caution. Because of the lack of standardization in environmental health indicators, we found it difficult to include any data set as a singular weighted criterion in the methodology. Furthermore, given that much of the city is designated as an Environmental Justice Area according to the NYC Mayor's Office of Climate & Environmental Justice, we wanted to avoid excessively eliminating potential sites.

In our analysis, we included a criterion of high concentration of existing waste transfer facilities, weighted at 15%. We also included in the criteria the sites' compatibility with the 2006 Solid Waste Management Plan, which set a goal to shift transfer of waste from trucks to barge and rail when possible. Many sites identified are located on the waterfront, meaning use of barge may be feasible, although location on the waterfront raises other potential concerns about flood protection, which were also taken into account in the criteria. For further environmental justice considerations, we concluded that a site-by-site focus would allow for a more comprehensive and helpful outlook.

Site Economics

Economics is a large component of the implementation of Intro 369-2026 and

the operations of compost facilities. In the methodology, criteria such as site vacancy, proximity to trucking routes, and type of ground surface attempt to capture favorable characteristics that would reduce operating and initial investment costs. Because the economics will vary depending on the method of processing compost, we were unable to do a more detailed analysis until this variable is determined for each site. This will be up to site operators to decide.

Types of Composting

Similar to economic factors, site operators will determine whether they use turned windrows, aerated static piles, or in-vessel systems to compost.

State Environmental Quality Review (SEQR) and City Environmental Quality Review (CEQR)

Sites will be subject to environmental review processes at the City and State levels. Because of the community-based steps in this process, it is difficult to capture in binary criteria.

Highlighted Sites

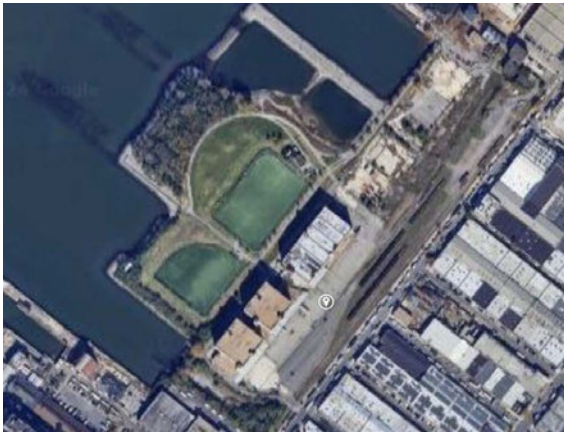
We conducted further research into certain sites ranked favorably by our analysis. The borough of Staten Island already has significant capacity at its DSNY facility, and any expansion would likely be associated with that existing site. Therefore, it was excluded from the site-specific research process. Selected individual feasible lots are further described by borough.

It is important to note that:

1. This is not a comprehensive list of all feasible sites; and
2. These sites are included for illustrative purposes only, and their inclusion should not be interpreted as meaning that a specific plan exists to establish a compost facility there.

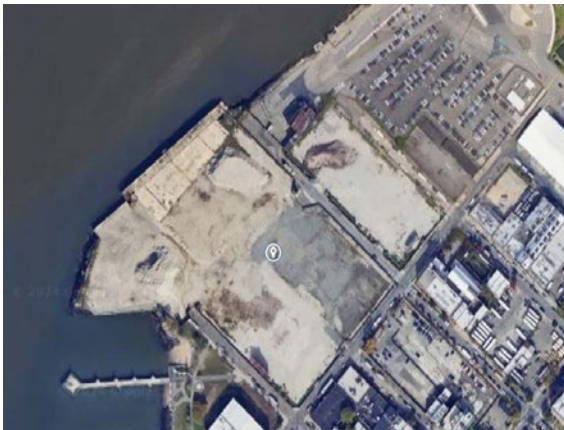
Brooklyn

Analysis shows that there is more than enough space in Brooklyn to reach 180,000 tons of compost processing capacity.



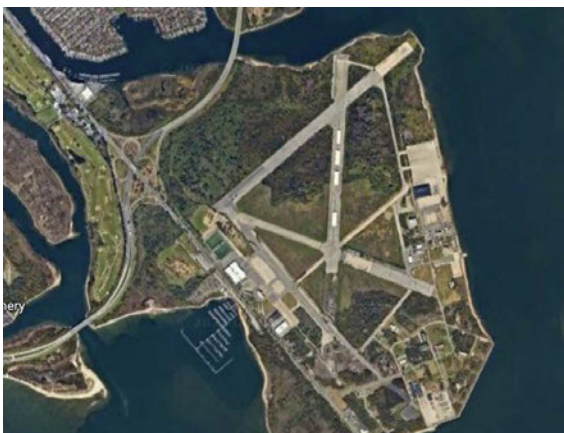
Land adjacent to Bush Terminal Piers Park B/W 50th St. and 1st Ave.

This 1,600,000 ft² site is owned by the New York City Department of Small Business Services and is located in Sunset Park, near the East River. New York City Economic Development Corporation plans to build a “Made in NYC” campus in the currently vacant building, and local advocates have specifically called for expansion of eco-industrial uses in this area.³⁹ The train yard on the street-facing side of the lot could support in-vessel composting methods without disrupting rail operations, and could likely process 50-60k tons each year. 1st Avenue, which runs adjacent to the site, is a DOT-designated trucking route.



Red Hook lots, 68 and 100 Ferris St.

The vacant lot and adjacent parking lot shown above are owned by BT Red Hook LLC, totaling roughly 400,000 ft², and the Governor’s Island Corporation, totaling 141,000 ft² respectively. They are designated as brownfields and thus could be associated with federal environmental mitigation or infrastructure grants. As long as a composting facility is built before other businesses, a mix of composting with other industrial uses on this site would be DEC-compliant. Both sites are two blocks away from a DOT-designated trucking route and have potential for marine waste transfer.



Floyd Bennett Field

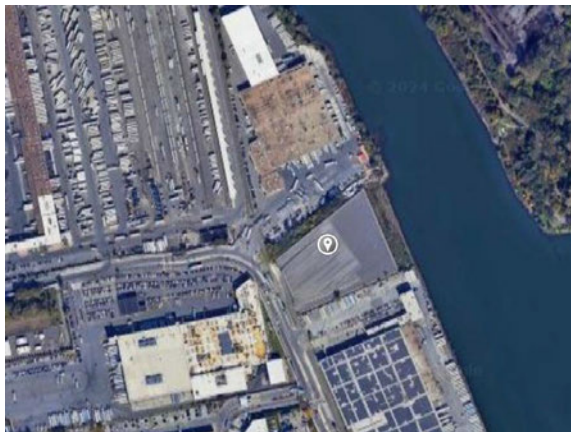
Floyd Bennett Field is part of the Gateway National Recreation Area, and is under the jurisdiction of the National Park Service. It totals 56,628,000 ft² and has been undergoing redevelopment for the past few years. There are plans to build an educational campus, including a high school at this site, focusing on “tech, sustainability, and environmental education.”⁴⁰ Co-siting a compost facility could further these goals, and provide a large-scale facility isolated from permanent residences and businesses. There is enough space to build the facility 500+ yards away from the school campus.

³⁹ Urban Equity Solutions for United Puerto Ricans Organization of Sunset Park (UPROSE). *Green Resilient Industrial District (GRID) Plan 2.0: A Just Transition for Sunset Park* (2023, July)

⁴⁰ Klinger, H. (2023, December 1). *Exclusive: New 7-acre educational campus coming to Floyd Bennett field*. CBS News.

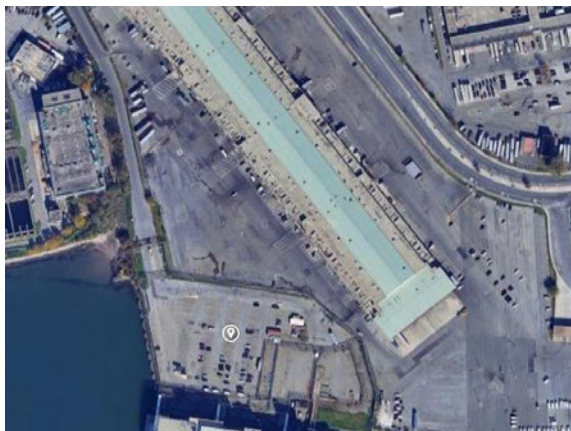
The Bronx

Analysis shows that there is more than enough space in The Bronx to reach 180,000 tons of compost processing capacity.



Hunts Point lot, 355 Food Center Dr.

As shown in the image, there is a lot of vacant land, or unoccupied parking lots surrounding the Hunts Point Food Market. DSNY has initiated a contract with Denali Waste Solutions to expand their organics processing to the west of the Market, but this is likely for commercial waste. Given that it is the largest produce market in the United States, siting compost nearby would be beneficial. The pinned lot shown on the map is currently vacant and owned by the New York City Department of Small Business Services. At roughly 220,000 ft², it is adjacent to trucking routes and has the possibility for marine transfer. While there already is a high concentration of waste processing facilities in the South Bronx, this facility would be far from residents.



Vernon C. Bain Center Parking Lot, 1 Halleck St.

The Vernon C Bain Center was a barge jail in Hunts Point, decommissioned in 2023. Owned by The New York City Department of Small Business Services, its parking lot is 623,000 ft². In its 2022 Hunts Point Forward report, New York City Economic Development Corporation pledged to lead a community-based process to repurpose the parking lot.⁴¹ If a compost facility is established first, it could become part of a broader plan for the site.



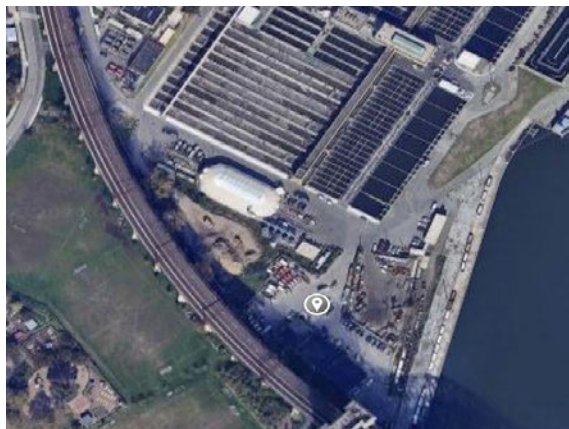
University Heights lot, Exterior St. north of University Heights Bridge

This 160,000 ft² lot in the North Bronx is owned by The NYC Department of Transportation, adjacent to the University Heights train station. It is alongside a DOT through trucking route.

⁴¹ New York City Economic Development Corporation with Hunts Point and Longwood Community Coalition. Hunts Point Forward (2022, June)

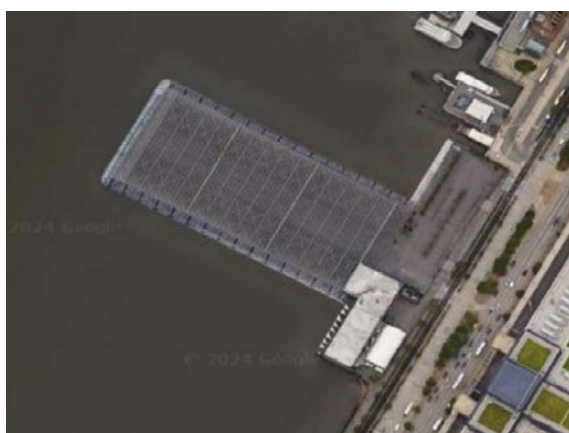
Manhattan

Analysis indicates that without significant land use changes or an increase in community composting capacity, Manhattan is unlikely to reach 180,000 tons of processing capacity.



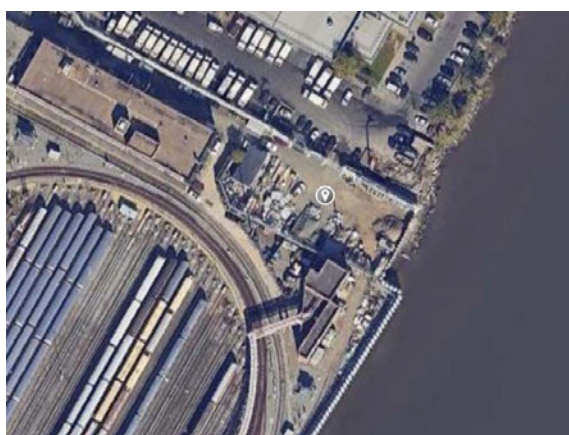
Randalls Island

This space is associated with the Wards Island Wastewater Recovery Facility, which is currently being used as an auxiliary parking lot. It is adjacent to a trucking route and has potential for marine transfer.



Pier 76, Hudson River Park at 37th St.

Pier 76, a part of Hudson River Park, is 588,000 ft², and newly paved and undeveloped. The former site of the Manhattan Tow Pound, it was incorporated into the park in 2021 and is now owned by the New York State Office of Parks, Recreation, and Historic Preservation. According to the Hudson River Park Trust, “Designated a ‘Park/Commercial’ pier by the Hudson River Park Act, this space will eventually host both public parkland and a revenue generating use that will help support the care, maintenance and operations of the Park as a whole.”⁴²



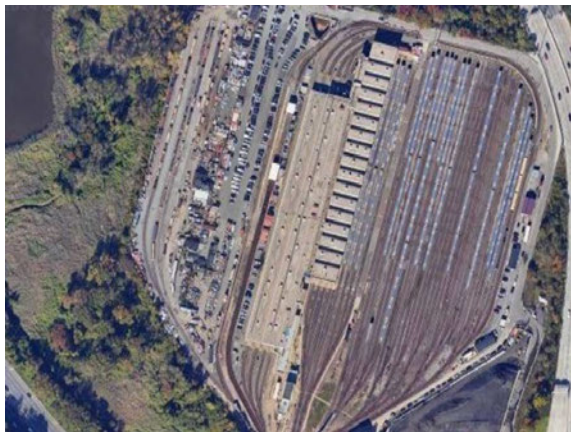
207th Street Train Yard Parking Lot, 215th St. and 10th Ave.

This site is owned by The New York City Transit Authority and is 20,000 ft².

⁴² [Pier 76](#). Hudson River Park Trust. (2024)

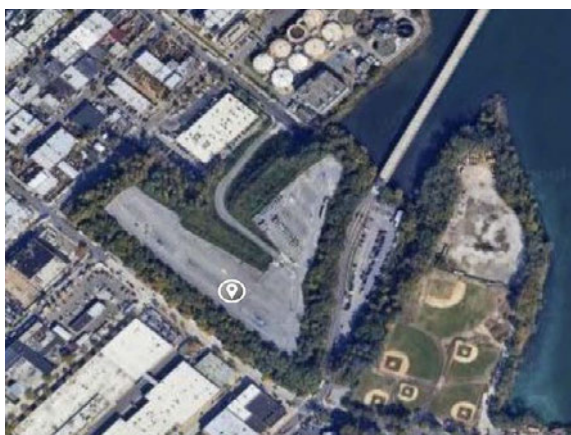
Queens

Analysis shows that there is more than enough space in Queens to reach 180,000 tons of compost processing capacity.



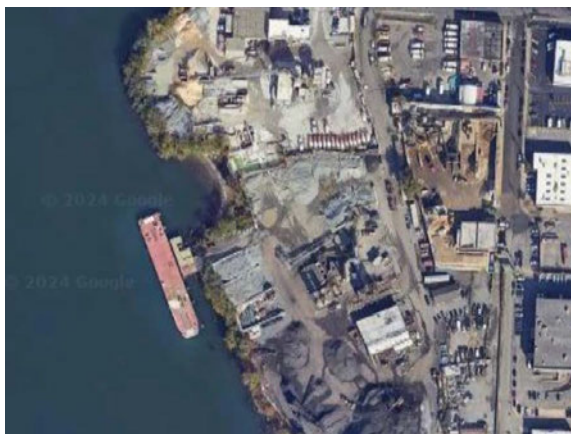
Kew Gardens Train Yard, adjacent to Willow Lake between Grand Central Pkwy. and Van Wyck Expy.

This would be a smaller site, as to preserve the functionality of the parking lot for MTA workers at the train lot. The parking lot area totals 320,000 ft² and is owned by New York City Transit Authority. The site would be far from residences and businesses and near a DOT through trucking route.



Astoria Parking Lot, 19th Ave. between 45th St. and Hazen St.

This 1,750,000 ft² Astoria lot, labeled as “LaGuardia Discount Parking,” and owned by the New York City Department of Small Business Services is near the Bowery Bay Wastewater Recovery Facility. It has a large buffer of trees, which would help minimize any potential negative community impact.



2121 College Point Blvd

This image captures two lots, 388,000 ft², owned by College Point Associates LLC, and 239,000 ft², owned by Ferrera Family Holding Corp. It features a dock along the Flushing Bay waterway, allowing for marine transfer, and is near College Point Avenue, a DOT trucking route.

Next Steps

Intro 369-2026 has the support of the Brooklyn, Bronx, Manhattan, and Queens Solid Waste Advisory Boards; Brooklyn Borough President Antonio Reynoso; and 23 City Council members at the time of publication. While DSNY has stated its opposition to the legislation, this report aims to refute some of their claims and underscore the feasibility of its implementation.

As shown, local siting of composting facilities would have environmental, economic, and public health benefits for the city, and we encourage the City Council to move swiftly to pass this bill.

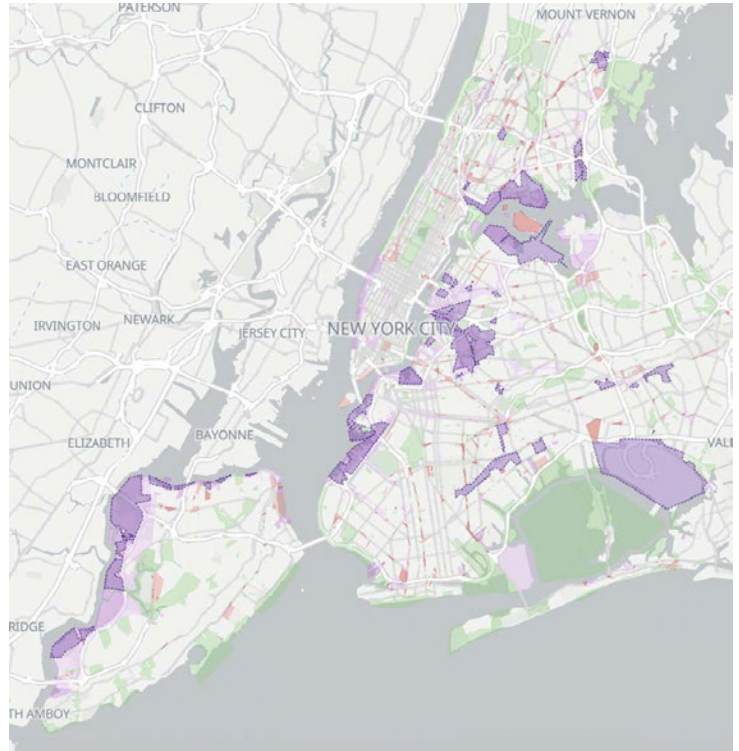
Criteria for Potential Composting Sites Prescribed by Intro 369-2026

Required by State and City Law

- **Zoning:** Restricted to M zones, C8, and C4
- **Proximity to Residences and Businesses (DEP Requirement):** 500+ feet of distance (200+ if yard waste only)
- **Bedrock (DEP Requirement):** 5+ feet
- **Odor Control (DEP Requirement):** Map using wind pattern data and surrounding development data
- **Proximity to surface water or wetlands (DEP Requirement):** 200+ feet, unless additional provisions used to control leachate

Further Criteria

- **Access to Sewer**
- **Site Vacancy:** Preference for minimal redevelopment required
- **Slope Gradient:** Generally, a lesser slope is preferable to gently control leachate and pooling
- **Access to Power**
- **Access to Uncontaminated Water**
- **Accesses to MS4 Stormwater Drainage System:** Municipal Separate Storm Sewer System
- **Floodplain risk:** If sited within a Floodplain or Wetland, significant additional protections required
- **Ground Material:** Impervious surface preferable
- **Land Use Compatibility:** No significant conflict with other land use priorities. For example, maintaining existing manufacturing land or housing development
- **SWMP Compatibility:** Compatibility with State and City Solid Waste Management Plan
- **Multi-Use Capability:** Possible incentives or benefits from co-siting with other waste processing or energy-generating facilities
- **Buffer Space:** Infrastructure for truck traffic, possible expansion



Map of NYC with Manufacturing zones highlighted. [Source.](#)

Environmental Justice Considerations

- Community Support
- Trucking burden
- Odor burden
- Noise burden
- Paving burden
- Nearby operational or previous environmental waste sites
- Benefits go to local community first
- Compliance with Waste Equity (LL 152)

Possible starting places to look

- Brownfields
- Piers
- Private parks
- Private and public golf courses
- Large vacant buildings

Notable Decisions After Site is Determined Feasible

- **Cost Considerations:**
 - **Costs to Operate the Site:**
 - Costs of hauling material in
 - Proximity to organics producers/
pickup sites (orange bins, drop-offs)
 - Costs of running the facility (labor, site
maintenance, machinery, etc.)
 - **Initial Costs to Build the Site:**
 - Current vacancy status
 - Grants (Brownfield) BIG Grants -
OER (nyc.gov)
- **Type of Composting:** Aerated static pile,
Turned windrows, In-vessel
- **Method of Screening:** Manual, mechanic
- **Method of Stormwater Management:**
Bioswales/Rain Gardens, Tarps. Link.
- **Method of Leachate Control:** Tarps,
sewage hookup, bulking/aerating agents
- **Method of Rodent Control:** Containers,
dogs, traps, poison
- **Method of Odor Control:** Containers,
strategic turning schedules, bulking
agents, absorption agents

DEC Requirements

Link

Methodology

The New York State Department of Environmental Conservation regulates all waste processing facilities in the state. Composting facilities would be subject to their legal guidelines for registered and permitted sites, as well as New York City zoning regulations. Beyond these explicit standards, compost facilities may require a variety of factors to ensure their success. These range from access to public utilities, to convenience of trucking and drop off routes. To capture sites that meet legal requirements, as well possess some favorable characteristics for their feasibility of large-scale composting, we compiled a list of criteria (see above) and sent it to the Solid Waste Advisory Boards for comment. Following feedback, we stratified it in order of importance to create a methodology. This produced a map of the city that identifies possible sites ranked according to their feasibility scores.

This methodology aims to highlight sites potentially available for composting, but does not include detail about which type of composting would be most feasible on each site. Ultimately, the goal is to identify 900,000 cumulative tons of composting capacity for organic waste management - 180,000 per borough, to meet the goals of Intro 369-2026. Note that Staten Island's Fresh Kills facility already has 150,000 tons of composting capacity and is the only food compost processing site in New York City currently managed by DSNY. The output of this analysis aims to highlight a selection of parcels that comply with DEC's requirements for compost facilities (6 CRR-NY 361-3.2) and are zoned appropriately for facility creation in NYC.

This review is limited to the characteristics listed and does not consider additional parameters that may be beneficial for further filtering of sites or future creative opportunities.

Compost Mapping Methodology

Essential Criteria

- Zoning (Zoned as M1, M2, M3, C4, or C8). [Source.](#)
- 5+ feet from bedrock. [Source.](#)
- 200+ or 500+ feet from residences and businesses. [Source.](#)
- 200+ or 500+ feet from surface water. [Source.](#)

Weighted Criteria

- **17.5%:** Slope, less than 4:1. [Source.](#)
- **17.5%:** Currently vacant or used as a parking lot. [Source.](#)
- **15%:** Outside of an area with a high concentration of waste facilities. [Source.](#)
- **10%:** Outside of flooding during heavy rain events. [Source.](#)
- **10%:** Outside of a wetland. [Source.](#)
- **10%:** Outside of the combined sewer network. [Source.](#)
- **10%:** Within .25 miles of Department of Transportation's trucking routes. [Source.](#)
- **5%:** Impervious ground surface. [Source.](#)
- **5%:** Outside of 2050 100 year floodplain. [Source.](#)

Expanding Composting in New York City:

The Case for Passing
and Implementing **Intro 369-2026**

Released October 2024





Waste Material Recycling and General Industrial Laborers' Local 108, LIUNA

Joshua Carrero

BUSINESS MANAGER

jcarrero@local108funds.com

June 10, 2026

Dear Chair Sanchez and Members of the Committee:

On behalf of Waste Material Recycling and General Industrial Laborers' Local 108, LIUNA, which represents hundreds of workers employed throughout New York City's commercial waste industry, we respectfully submit this testimony in opposition to Intro. 911-A and in support of Intro. 353.

The Commercial Waste Zone program represents one of the most significant reforms in the history of New York City's commercial waste industry and is now entering a critical stage of implementation. The program was carefully designed to improve worker safety, reduce truck traffic and emissions, increase operational efficiency, promote environmental sustainability, and create a more stable and accountable commercial waste system that benefits workers, businesses, and the communities they serve.

Local 108 strongly opposes Intro. 911-A. This legislation would require the Department of Sanitation to increase the number of awardees in the Staten Island Commercial Waste Zone beyond the number established through the City's competitive selection process while delaying implementation until 2028. These changes would undermine the careful planning that has guided the Commercial Waste Zone program from its inception. Delaying implementation would postpone the safety, environmental, and operational benefits the program was designed to deliver, while increasing the number of awardees could reduce route density, diminish operational efficiency, and make it more difficult to achieve the program's intended goals. Additional delays would also prolong uncertainty for workers, employers, and customers and slow progress toward a safer, cleaner, and more efficient commercial waste collection system.

Local 108 respectfully urges the Committee to reject Intro. 911-A and allow the Commercial Waste Zone program to move forward as intended.

Local 108 strongly supports Intro. 353, which would establish a Commercial Waste Zones Working Group. As implementation continues, it is important that workers, employers, City agencies, and businesses have a formal forum to evaluate the program, identify operational challenges, and recommend practical improvements. Establishing a Working Group will promote collaboration, transparency, and accountability while ensuring the program continues to evolve based on real-world experience. This collaborative approach will help the City achieve its goals of safer streets, cleaner communities, improved environmental performance, and a stable, safe, and efficient commercial waste industry for the public alike.

Laborers' Local 108 respectfully urges the Committee to reject Intro. 911-A, pass Intro. 353, and continue supporting the successful implementation of the Commercial Waste Zone program.

Thank you for the opportunity to submit this testimony

Joshua Carrero

BUSINESS MANAGER

Waste Material Recycling and General Industrial Laborers' Local 108, LIUNA



STATEMENT OF THE NATURAL RESOURCES DEFENSE COUNCIL
BEFORE THE NEW YORK CITY COUNCIL
COMMITTEE ON SANITATION AND SOLID WASTE MANAGEMENT
RE: COMPOST PROCESSING, COMMUNITY COMPOSTING,
MARINE TRANSFER STATIONS, AND COMMERCIAL WASTE ZONES

July 1, 2026

Good afternoon, Chair Sanchez, and members of the Committee. My name is Eric A. Goldstein, and I am NYC Environment Director at NRDC (Natural Resources Defense Council). NRDC is an international, not-for-profit organization active on a wide range of public health, natural resource protection, and quality-of-life issues around the globe, across the country, and here in New York City, where NRDC has had our main offices since the organization's founding in 1970. One of NRDC's New York regional priorities has been to transform solid waste practices from primary reliance on landfilling and incineration to making waste prevention, composting, recycling, and equity the cornerstones of a more sustainable and affordable waste policy in the nation's largest city

I appreciate the opportunity to be here to testify regarding several significant bills that the Committee is considering today.

NRDC Strongly Supports Intro 369 – Adding Compost Processing Capacity in Every Borough

Intro 369, championed by councilmember Sandy Nurse, would require the Department to establish at least one organic waste composting facility in each borough to accept source-separated organics to more sustainably handle the single largest portion of the city's residential waste stream – food scraps, yard waste, and food-soiled paper. This is in all probability the most important bill likely to come before the Sanitation Committee this year. Here's why. Organics alone account for more than one-third of total residential waste tonnage. Today, most of this waste is dumped in landfills (generating methane, a very potent global warming gas) or incinerators (where its high moisture content fouls the burning process, discharging air contaminants in surrounding communities). Even with the launch of the city's curbside organics collection program, most of the captured materials are being delivered to the city's Newtown Creek sewage plant to be mixed with sewage sludge to generate modest amounts of energy. While this may be preferable to landfilling or incineration, it is far from the best and most sustainable disposal route for valuable compostables. For New York's still-developing curbside organics collection program to succeed, the city will need to ensure the bulk of these materials are in fact transported to actual composting facilities, whether city-owned, private, or non-profit.

NATURAL RESOURCES DEFENSE COUNCIL

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Developing additional in-city composting capacity also has economic benefits. Since composting -- unlike landfilling or incineration -- produces a useful finished product with actual market potential, it should save the city money in reduced waste disposal costs over time. (Seattle, for example, is saving money for every ton of organics it sends to a composting operation, rather than a landfill.) And in-city composting facilities can produce green jobs for city residents, as opposed to sending these organics to out-of-city waste disposal sites. To be sure, there may need to be an adjustment to the ambitious 180,000 wet tons-per-year in each borough processing capacity number included in the present version of Intro 369. But there can be no doubt that establishing additional, equitably sited compost processing capacity in each borough is the single most important next step the Council can take to convert the city's expensive and polluting waste disposal program into a national model of sustainability and green jobs.

NRDC Strongly Supports Intro 367 – Facilitating the Use of the City's Modern Marine- and Rail-Transfer Stations to Accept Commercial Waste & Advance Environmental Justice

Intro 367 would direct the Sanitation Department to begin accepting and processing commercial solid waste at the city's state-of-the-art Marine Transfer Stations and city-owned or operated rail transfer stations. This legislation is intended to address a long-standing environmental justice issue -- the burden of disposing of the city's waste has been carried for decades primarily by residents in three neighborhoods (North Brooklyn, the South Bronx, and Southeast Queens) where poorly operating land-based transfer stations have been located. Residents in these communities have been overwhelmed by air and noise pollution, traffic, and quality-of-life insults from dozens of diesel-powered waste trucks pouring into and out of transfer stations at all hours of the day and night. The proposed legislation offers at least a partial solution. Several city-owned Marine Transfer Stations and rail-based transfer stations have sufficient capacity to accept commercial waste from private carters. In so doing, they could divert a significant amount of waste truck traffic away from already over-burdened environmental justice communities. DSNY Commissioner Greg Anderson has the talent, expertise, and staff to make this long-promised policy reform a reality. He just needs the go-ahead from the City Council.

NRDC Strongly Opposes Intro 911 – Weakening the Commercial Waste Zone Statute and Carving Out Exceptions for Staten Island Waste Haulers

Intro 911 would amend the landmark Commercial Waste Zones law by carving out exceptions to this statute to the benefit of Staten Island private carters but to the detriment of Staten Island residents. Specifically, the bill would double the number of allowable carters from 3 to 6 in the Staten Island zone and delay the implementation date of the zone program in that borough. However, more private carters operating in the Staten Island zone means more diesel-spewing waste trucks zooming across the borough -- an outcome that would directly contradict the intent of the Waste Zone statute. In addition, that statute -- Local Law 199 of 2019 -- was not enacted hastily but was the product of years of debate in the City Council. And, in the final vote



on the 2019 waste zone legislation, only one of three Staten Island councilmembers voted in opposition. Finally -- and beyond the adverse environmental and waste reform consequences of Intro 911 -- carving out an exception to a citywide statute for only a single borough would set a dangerous precedent for city law-making.

NRDC Strongly Supports Intro 356 – Allowing Community Composting Operations to Charge for Organic Waste Drop-Offs and to Sell Valuable Finished Compost

Community composting non-profits are the backbone of composting operations in New York City. They perform an essential educational function by teaching city residents how and why to compost. They produce finished compost that is distributed to residents throughout all five boroughs. They accept yard waste from city parks and help to sustainably convert that material into nutrient-rich compost. And they provide volunteer opportunities, teach kids about the environment, and help revitalize the neighborhoods in which they are located. But to ensure their long-term success, it makes sense to allow them to charge for organic waste dropped off at their facilities and to sell high-value finished compost they produce. NRDC envisions that charges for food scraps or yard waste drop-offs would be applied primarily to local restaurants and other nearby food waste generators and to local gardening services. Residents already have curbside organics collections and the smart-bin program where they can deposit organics without charge. And of course, this legislation would just allow, but not require, community composters to charge for food waste drop-offs. We believe the Council should clarify that the primary purpose of this bill is to provide non-profit community composters with a supplemental source of income should they decide to exercise the option to charge businesses, in particular, for their services. Finally, passage of this legislation should not be an excuse for the Council to cut essential annual funding for community composting organizations. We appreciate the Council's \$5.2 million Schedule C funding for community composting non-profits in the just-agreed-to FY '27 final budget. And we view that funding as supporting an essential sanitation service.

NRDC Supports Intro 353 – Creating a Commercial Waste Zones Working Group

Intro 353 would establish a Commercial Waste Zones working group to study implementation of the waste zone program and make recommendations to ensure that the objectives of the City Council in enacting the landmark waste zone statute -- Local Law 199 of 2019 -- are being met. Local Law 199 was designed as a transformative jolt to the irrational, polluting, and dangerous system of commercial trash collection that had been problem-plagued for decades. That statute's objectives included significantly reducing diesel truck traffic; improving working conditions for private sanitation workers; stepping up composting and recycling of commercial waste; advancing pedestrian and vehicular safety; and providing more reliable, transparent services for businesses. As the waste zone program continues to roll out across the city, it is sensible for the Council to bring together all of the affected stakeholders to evaluate the progress of this program and to recommend additional reforms, should they be necessary.



New York City Environmental Justice Alliance

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**Testimony on the Marine Transfer Stations, Commercial Waste Zones and Composting-
Committee on Sanitation and Solid Waste Management
New York City Council
July 1st, 2026**

Founded in 1991, the New York City Environmental Justice Alliance (NYC-EJA) is a non-profit, 501(c)3 citywide membership network linking grassroots organizations from low-income neighborhoods and communities of color in their struggle for environmental justice. NYC-EJA empowers its member organizations to advocate for improved environmental conditions and against inequitable environmental burdens by the coordination of campaigns designed to inform City and State policies. Through our efforts, member organizations coalesce around specific common issues that threaten the ability of low-income communities of color to thrive. NYC-EJA is led by the community-based organizations that it serves. NYC-EJA is also a founding member of Transform Don't Trash (TDT), a longstanding coalition of environmental justice, labor, and climate organizations working to transform New York City's sprawling solid waste management systems to be far more equitable, efficient, sustainable, and safe for workers and the communities most affected by solid waste infrastructure.

In New York City, over 14 million tons of garbage are produced daily, generating massive transportation and pollution impacts to and from privately owned and operated waste transfer stations in our communities. In the absence of utilizing municipal facilities located near commercial districts and commercial waste routes equitably and efficiently, DSNY [most recently reported](#) that almost 12,000 tons per day (75%) of the City's waste is still trucked in and out of a handful of low-income communities and communities of color. The vast majority of this garbage generated by businesses and buildings citywide passes through communities with some of the highest rates of asthma such as North Brooklyn, the South Bronx, and Southeast Queens. Despite laws intended to change this, these communities of color continue to deal with far more than their fair share of heavy truck traffic, safety hazards, pollution, noise, and odor that other neighborhoods are spared.

While the total amount of waste handled at private transfer stations in NYC has decreased approximately 17% since the implementation of Local Law 152 of 2018 (the "Waste Equity Law"), the current solid waste system is still an ongoing environmental injustice in which five community districts handle nearly 24 waste facilities while 45 community districts have no waste facilities at all. Reducing emissions and pollutants from trash removal operations is necessary to minimize climate impacts and improve the health of all New Yorkers. Mayor Mamdani and the City Council have an opportunity to take immediate steps to relieve these communities of



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excessive truck traffic, pollution, and odors, while reducing the miles that are driven by dangerous and polluting waste trucks on New York City Streets.

We continue to strongly support rapidly implementing Local Law 199 of 2019 (or the “Commercial Waste Zone Law”), which mandates a citywide transition for how our commercial waste is handled. We are pleased that the City has rolled out some of the zones and strongly urge the city to quickly implement all zones by 2026. The law simultaneously makes the dangerous and polluting commercial waste system far more transparent, accountable, efficient, and safer while giving the City the tools it needs to sharply incentivize reducing the vast amounts of commercial waste disposed of in landfills and incinerators. For this reason, **NYC-EJA strongly opposes [Intro 911-A](#)**, which would double the number of private haulers contracted to collect commercial waste on the Staten Island zone and delay the implementation of the Commercial Waste Zone system on Staten Island. The bill would exclude Staten Island residents, workers, and businesses from the environmental relief and benefits provided by the Commercial Waste Zone law and undermine its intent. We call on the City to fulfill the waste equity goals of the current SWMP by planning for designated haulers in these new zones to maximize use of marine and rail transfer facilities and make these facilities competitively priced to incentivize haulers to utilize these efficiently located marine facilities. Additionally, to increase transparency, the public should have easy access to designated haulers diversion plans, customer education, and VMT reduction plans.

DSNY reports estimate that fully implementing the use of Marine Transfer Stations (MTS) would decrease truck traffic associated with commercial waste collection by 50% citywide, as measured in vehicle miles traveled, reducing the number of trips, the lengths of collection routes for commercial waste, air pollutant emissions, and noise, as well as improving traffic safety. A Final Environmental Impact Statement (FEIS) for the 2006 SWMP was conducted to evaluate plans to accept 3.772 tons of commercial waste collected by private haulers at four marine transfer stations during overnight hours. However, permit and tonnage data released by DSNY shows that several marine transfer facilities still handle far less waste than their permits allow, ultimately delaying relief to environmental justice communities. For this reason, **NYC-EJA is here to express our strong support of [Intro 367 of 2026](#)**, which would require DSNY to begin using municipal marine transfer stations to accept commercial waste. Passage of this legislation would hasten the long overdue transition of NYC’s waste export system from a polluting truck-based one to a water barge-based system, where one barge can replace the capacity of 48 eighteen wheel tractor trailer “long haul” trucks from spewing pollutants into these communities. Environmental justice communities have long advocated for this step, which is required by the Solid Waste Management Plan that was passed by the City almost 20 years ago, but has still not been implemented by DSNY.



For inedible food and yard waste, composting is a healthier route for the planet that can provide other benefits to New York City residents than using landfills and incineration. Recycling food scraps and yard waste through composting turns these discarded materials into a valuable end product. The finished compost that is produced during the natural process of decomposition in the presence of microorganisms and oxygen can be used as a natural fertilizer that improves soil health, retains water, and reduces waste. It does not have the adverse global warming impacts of landfilling and existing City-run waste operations. Community-based composting operations are already producing numerous benefits and finished compost that is being applied to soil in City parks, community gardens, street tree pits, and home gardens to improve the health of city greenery.

Municipal composting sites are also necessary to process increasing amounts of food and yard waste separated by both residents and businesses as landmark curbside composting and commercial waste zones programs are fully in place. These facilities could efficiently recycle millions of tons of organic waste per day, reducing the need for expensive and environmentally harmful waste export, reducing distances traveled by compost collection trucks, and creating good local jobs in our communities. **NYC-EJA strongly supports Intro 356 and 369 of 2026**, which would advance the collection, sale and expanded capacity for the City's composting of organic food scraps and yard waste at local, large-scale facilities in each borough. Additionally, composting capacity could be expanded on Rikers Island, where a small-scale composting operation has operated for many years, to be consistent with Local Law 16 of 2021 and the island's use for "sustainability and resiliency purposes."

These facilities are far preferable to anaerobic co-digestion facilities where food waste is added to sewage sludge to produce biogas. National Grid's co-digestion pilot program at Newtown Creek has resulted in [excessive methane gas flaring](#) and perpetuates the use of harmful fossil gas infrastructure and gas combustion systems in buildings. We call on the City to expand the categories of businesses that can be designated by the Department of Sanitation to be required to comply with requirements regarding separation and disposal of organic waste when the commercial waste zone in which the establishment is located goes into effect. Additionally, the City should commit to downsizing and ultimately ending contracts with "waste to energy" facilities outside of the City, such as in Essex County, which further imposes environmental harm on other overburdened environmental justice communities.

The fight for waste equity, cleaner air, healthier and safer communities continues as we work to ensure that the City not only handles its trash and siting of waste transfer stations more equitably, but also reduces its greenhouse and co-pollutant emissions by transitioning to



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alternative greener modes of solid waste management. NYC-EJA alongside TDT looks forward to working with the Committee on Sanitation and the Council Members representing impacted communities on making rapid progress toward a more sustainable and just future.



**NWRA Testimony Before NYC Council Sanitation and Solid Waste Management
Committee
July 1, 2026**

My name is Lew Dubuque, and I am the Vice President for the Northeast of the National Waste & Recycling Association (NWRA). NWRA represents the hardworking men and women of the industry who collect and manage the waste, recyclables and organics produced by the more than 100,000 commercial entities in this great city. Our member companies will also be servicing customers in 19 of the 20 Commercial Waste Zones across New York City when it is fully implemented, and we appreciate the opportunity to provide testimony today regarding Intro. 353, Intro. 367, and Intro. 911-A.

Intro. 353 – Commercial Waste Zone Working Group

NWRA strongly supports Intro. 353.

Two years ago, I appeared before this Committee in support of legislation establishing a Commercial Waste Zone Working Group because we believed that successful implementation of this unprecedented program would require ongoing collaboration among DSNY, the private industry, labor, elected officials, and other stakeholders. That belief has only been reinforced as the Commercial Waste Zone program has moved from planning into implementation.

Commercial Waste Zones represent one of the most significant changes to New York City's waste collection system in decades. Nowhere else in the United States has a commercial franchise system been implemented at this scale or with this level of complexity. While the transition has presented challenges, NWRA and its members remain committed to helping make the program successful.

From the beginning, our industry has shared the City's goals of improving safety, reducing truck traffic, increasing sustainability, lowering emissions, and promoting fair labor practices. We have invested significant time, resources, personnel, and capital to ensure a successful transition.

As implementation has progressed, however, it has also become clear that no program of this magnitude can anticipate every operational challenge in advance. The value of a formal Working Group is that it provides a constructive forum where issues can be identified early, practical solutions can be developed collaboratively, and stakeholders can continue improving the system without disrupting service to New York City's businesses.

The Commercial Waste Zone program will continue evolving over the coming years. Maintaining regular communication between DSNY, awardees, labor, customers, and the Council will be essential to ensuring its long-term success. A Working Group provides exactly the type of collaborative process needed to accomplish that goal.

NWRA respectfully urges the Committee to approve Intro. 353.

Intro. 367 – Commercial Waste at Marine and Rail Transfer Stations

NWRA appreciates the intent behind Intro. 367 and supports the continued expansion of environmentally responsible waste transportation options, including marine and rail infrastructure.

Our industry has long supported efforts to reduce truck miles traveled, improve air quality, and utilize rail and marine transportation whenever it is operationally practical and economically feasible. These objectives are consistent with many of the goals underlying the Commercial Waste Zone program.

However, NWRA has significant concerns with any proposal that would effectively require commercial waste to be delivered to City-owned marine or rail transfer stations.

First, the legislation raises concerns regarding flow control. For decades, New York City's commercial waste system has operated under a competitive disposal marketplace where private companies determine the most efficient and appropriate transfer and disposal facilities based on operational, environmental, and economic considerations. Requiring commercial waste to be processed through specific City-owned facilities represents a significant departure from that long-standing model and would limit the operational flexibility that has allowed the private sector to efficiently serve New York City's businesses.

Moreover, throughout the Commercial Waste Zone procurement process, DSNY asked proposers to demonstrate operational efficiency, cost competitiveness, and the ability to provide reliable service under the conditions established in the Request for Proposals. Awardees developed their proposals based upon the disposal infrastructure that existed at that time. It would be inconsistent with that procurement process to later require all awardees to utilize a disposal network that was neither contemplated during the bidding process nor reflected in the contracts ultimately awarded.

Commercial Waste Zone agreements were negotiated through a lengthy procurement process. Awardees negotiated transfer station agreements, established customer pricing, purchased equipment, hired employees, secured financing, and designed collection routes based upon those assumptions. Imposing a new disposal requirement after contracts have been awarded would fundamentally alter the economics of those agreements and shift significant costs onto companies that relied upon the City's original procurement framework.

In addition, directing commercial waste to specific City-owned facilities could create capacity constraints, increase wait times, reduce operational efficiency, and require substantial route modifications. Those changes would inevitably increase transportation and labor costs while reducing the flexibility necessary to respond to changing market conditions, equipment issues, weather events, or other operational disruptions.

Ultimately, these additional costs cannot simply be absorbed indefinitely. They will eventually be reflected in higher costs for New York City's commercial customers—the very businesses the Commercial Waste Zone program was designed to serve more efficiently.

The goals of increasing the use of marine and rail transportation, reducing truck traffic, and improving environmental outcomes are goals that NWRA fully supports. Our members have invested millions of dollars to help make the Commercial Waste Zone program successful and remain committed to working with the City to advance those objectives. We simply believe those goals can best be achieved through collaboration, incentives, and operational flexibility—not through a potential mandatory flow-control requirement that changes the rules after Commercial Waste Zone contracts have already been awarded. We look forward to continuing to work with the Council and DSNY to develop policies that advance the City's environmental priorities while preserving the operational efficiency, competition, and predictability that are essential to a successful Commercial Waste Zone program.

NWRA respectfully encourages the Council to amend Intro. 367 to specify participation is voluntary rather than mandatory.

Intro. 911-A – Staten Island Commercial Waste Zone

NWRA appreciates the Council's desire to ensure a successful rollout of Commercial Waste Zones throughout every borough, including Staten Island. At this time, NWRA does not take a formal position regarding the proposed implementation schedule for Staten Island or the number of awardees authorized to serve that borough. Our primary concern is maintaining a consistent and predictable Commercial Waste Zone framework across New York City.

Since adoption of Local Law 199, both DSNY and the private sector have devoted enormous effort toward implementing a single citywide commercial franchise system. Throughout that process, our members have adapted to numerous operational and regulatory changes while continuing to invest in equipment, facilities, personnel, and customer service.

Introducing statutory requirements that apply differently to one Commercial Waste Zone than to every other zone creates uncertainty and has the potential to establish different operational standards depending upon geography. Consistency has been one of the guiding principles of Commercial Waste Zones, and maintaining that consistency benefits regulators, awardees, customers, and ultimately the success of the program itself.

If different implementation standards are established for one borough, it raises the possibility that future modifications could likewise become zone-specific rather than citywide, making administration of the program increasingly complex over time.

For that reason, while NWRA is not opposed to ensuring Staten Island's successful implementation, we encourage the Council to carefully consider whether creating separate statutory requirements for a single Commercial Waste Zone is consistent with the long-term goals of the overall Commercial Waste Zone program.

Thank you for the opportunity to provide testimony today. NWRA looks forward to continuing to work collaboratively with the City Council, DSNY, labor representatives, and all stakeholders to ensure that New York City's Commercial Waste Zone program fulfills its promise of creating a safer, cleaner, more sustainable, and efficient commercial waste collection system for generations to come.

REBNY Testimony | July 1, 2026

The Real Estate Board of New York to The New York City Council Committee on Sanitation and Solid Waste Management re: Intro 353

The Real Estate Board of New York (REBNY) is the City's leading real estate trade association representing commercial, residential, and institutional property owners, builders, managers, investors, brokers, salespeople, and other organizations and individuals active in New York City real estate. REBNY appreciates the opportunity to submit testimony regarding Intro. 353-2026, which would establish a Commercial Waste Zones Working Group to study the implementation of New York City's Commercial Waste Zones (CWZ) program and make recommendations concerning its operation and future policy direction.

REBNY supports the creation of a structured forum for stakeholders to evaluate the implementation of the CWZ program. The CWZ system is a significant change to the City's commercial waste collection framework, with implications for businesses, property owners, waste haulers, workers, and communities throughout the five boroughs. Given the scale and complexity of this transition, ongoing stakeholder engagement and feedback are critical to ensuring that the program achieves its objectives while minimizing unintended consequences.

We appreciate that the legislation recognizes that representatives from carters, labor organizations, environmental experts, and micro-hauling organizations should participate in the working group. However, the legislation does not provide for representation of the commercial property owners and businesses that are ultimately responsible for procuring waste collection services and implementing many of the operational changes associated with the CWZ program.

Commercial property owners are among the stakeholders most directly affected by the CWZ program, as they are responsible for coordinating waste storage, collection schedules, loading dock operations, tenant communications, and compliance with new requirements. These responsibilities are particularly significant in office buildings, mixed-use properties, retail centers, industrial facilities, and other multi-tenant commercial properties. Commercial owners possess firsthand operational experience that would provide valuable insight into how CWZ properties function in practice and help the working group develop practical, effective recommendations.

Accordingly, REBNY recommends that Intro 353 be amended to reserve at least two seats on the working group for representatives of commercial property owners and managers. Including commercial property owners alongside labor, environmental advocates, and waste industry representatives will strengthen the working group's recommendations and improve the program's long-term implementation.

REBNY appreciates the Council's efforts to establish a transparent process for evaluating the implementation of CWZs and looks forward to working with the Council to ensure commercial property owners are represented in this important conversation.

Thank you for your consideration.

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**Public Testimony of Transportation Alternatives
Committee on Sanitation and Solid Waste Management Hearing on
Wednesday, July 1, 2026**

My name is Corey Hannigan, and I am the Policy and Government Relations Director for Safe Streets at Transportation Alternatives. Thank you for this opportunity to testify today **in opposition to Intro 0911-A**, which would gut the long-delayed commercial waste zones and harm New Yorkers with more polluting, dangerous, and deregulated waste haulers. We are also grateful to testify **in support of Intro 0367** to reduce truck traffic on our streets and the bills strengthening New York City's composting program, which diverts organic waste from landfills, reduces dangerous truck traffic on our streets, and supports local community groups and gardens.

Transportation Alternatives is a grassroots nonprofit advocating to transform New York City's streets into safe and sustainable places to walk, bike, take transit, gather, and thrive. Our goal is for every New Yorker to be safe when they walk to school, bike to work, or take the bus to a doctor's appointment.

Private waste haulers are a notoriously dangerous and unregulated industry, with a high injury rate for workers and a history of reckless driving. Just three months ago, a turning garbage truck operated by Royal Waste hit and killed Nishath Jannath, a 19-year-old woman, as she crossed the street in Queens. And only months before that, a 75-year-old woman named Li Liang was killed on an East Harlem sidewalk in a crash caused by a Classic Recycling waste hauler. Both fatal crashes took place in neighborhoods not yet covered by the commercial waste zone program.

The bill establishing commercial waste zones, which passed seven years ago and is still only partially implemented, was designed to cut back the city's private carting fleet's vehicle travel [by 78%](#), reducing New Yorkers' exposure to dangerous truck traffic, lowering emissions, making operations more efficient, and reducing costs. It has the important co-benefit of providing the City with oversight over a historically ~~lawless and~~ underregulated industry. **Intro 0911-A** would double the number of garbage truck contractors allowed on Staten Island's streets under the program, as well as delay its implementation there. Passing this bill would endanger Staten Islanders, reduce the efficacy of a program designed to make waste hauling in the city safer and more efficient, and increase Staten Island businesses' bills, as each waste company would likely end up traveling more miles for fewer pickups. One waste hauler told an [industry news site](#) that he's seen a notable reduction in operating costs since being awarded a zone contract, confirming "The density really does work."

The commercial waste zone program has immense promise, providing oversight over an underregulated industry while making operations more efficient and safe – but only if the City chooses to prioritize consistency, efficiency, and safety above all.

By contrast, Transportation Alternatives **supports Intro 0367**, which would give commercial waste haulers cleaner and safer alternatives to truck traffic. Trucks killed 25 people last year, including 16 pedestrians and cyclists. Trucks move [nearly 90%](#) of our city's 198 million tons of freight, but there are better alternatives: new shipping hubs on waterways alone could take [6,000 trucks](#) off of New York City's streets. Moving as much freight – particularly predictable freight like waste – to more sustainable modes like rail, waterways, and small last-mile vehicles can reduce truck traffic: saving lives, reducing emissions, and unclogging our congested streets and curbs – a clear win for all New Yorkers.

In addition, collecting and processing organic waste locally could reduce trash collection, lowering the cost of waste hauling for businesses and the city, as well as bringing in [\\$35 million](#) in recycled compost and biogas. Creating new local composting facilities and supporting this local processing can strengthen the initiative and our communities, and further reduce truck traffic on our streets.

Reducing truck traffic on New York City streets – with more efficient operations, sustainable alternatives, and localized destinations – will keep our children safe as they cross the street, lower asthma rates, reduce costs for our small businesses, and ease the congestion that grips our city. It is crucial to protect the progress we've made, and to go further in making our city work for every New Yorker.



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**Testimony of Justin Wood, Director of Policy at New York Lawyers for the Public
Interest to the New York City Council Committee on Sanitation
on July 1, 2026**

My name is Justin Wood, and I am the Director of Policy at New York Lawyers for the Public Interest (NYLPI). Thank you, Chair Sanchez and members of the Council for the opportunity to testify today.

As another summer of extreme heat descends on us, the federal government continues an assault on renewable energy, climate science, public health, and the very concept of environmental justice. Ongoing reform of our sprawling solid waste management system is one of the most immediate, and tangible improvements City government can make for environmental justice communities, for historically exploited workers, and for our shared environment.

With this framework, we strongly support Intros 0367 and Intro 0369 introduced by Council Member Nurse.

Intro 0367 is a major, decades-old priority for environmental justice communities that continue to bear the pollution and safety burdens of unjustly sited concentrations of waste transfer stations. These facilities were designed at their inception to accept commercial waste, and the 2006 Solid Waste Management Plan and accompanying Environmental Impact Study explicitly proposed that the City state-of-the-art municipal marine and rail transfer stations for both commercial waste and residential waste to reduce the number of diesel long-haul export trucks in environmental justice communities.

While the per-ton costs of DSNY's transfer stations may prove to be higher than comparable tipping fees at private, truck-based facilities, strategic use of these facilities could also reduce vehicle miles traveled, labor costs, and bridge and tunnel tolls for commercial haulers and/or subcontractors operating in nearby zones. We urge DSNY to rapidly assess the marginal costs to the department and level of subsidy that might be necessary to incentivize CWZ awardees and their subcontractors to use marine and rail-based transfer and recycling facilities – especially in locations like Manhattan where an MTS is close to large commercial districts.

We similarly support Intro 0369, which would require the City to operate at least one major aerobic composting facility in each borough, building on the successful expansion of the Fresh Kills compost facility. With the passage of Intro 31 yesterday and the long-awaited implementation and enforcement of both commercial and residential organic waste recycling rules, now is the time for the City to begin planning to process far more of this waste locally, and produce rich soil fertilizer for our parks, farms, and gardens.

Finally, we strongly oppose Intro 911-A, which would retroactively delay and undermine implementation of the Commercial Waste Zones system in the Staten Island zone. Simply put, Staten Island residents, sanitation workers, and businesses deserve the immediate benefits of the CWZ system studied, debated, and legislated almost a decade ago: Safer streets, cleaner air, recycling composting and food donation services, and an

affordable price structure that ensures businesses can save money by diverting waste from landfills and incinerators.

By doubling the number of haulers permitted to operate in one of the City's zones, Intro 911-A would diminish route efficiencies, adding polluting truck miles to local streets and highways, and contribute to dangerous driver fatigue and overwork. It would also make it far more difficult and costly for DSNY and the Business Integrity Commission to enforce the many safety, recycling, pricing, and transparency rules built into the new system. Additionally, Intro 911-A would allow continued air pollution in environmental justice communities with some of the highest rates of asthma including disadvantaged communities in Brooklyn and New Jersey.

Increasing the number of competitors in the Staten Island zone would similarly undermine private sector investments in cleaner trucks, recycling and composting services, and worker safety programs that current contract awardees must undertake to comply with contractual obligations under the CWZ system. Altering the terms of the RFP that these contractors responded to and won would likely trigger litigation against the City.

We look forward to working with the Council to advance sustainability and fairness in the solid waste system.

Sincerely,

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For 50 years, NYLPI has fought to protect civil rights and achieve lived equality for communities in need. Led by community priorities, we pursue health, immigrant, disability, and environmental justice. NYLPI combines the power of law, organizing, and the private bar to make lasting change where it's needed most.

For more information visit: www.nylpi.org



**Testimony of Alia Soomro, Deputy Director for New York City Policy
New York League of Conservation Voters
City Council Committee on Sanitation and Solid Waste Management
July 1, 2026**

My name is Alia Soomro and I'm the Deputy Director for NYC Policy at the New York League of Conservation Voters (NYLCV). NYLCV is a statewide environmental advocacy organization representing over 30,000 members in New York City. Thank you, Chair Sanchez and members of the Committee on Sanitation for the opportunity to comment.

One of NYLCV's top priorities is achieving our zero waste by 2030 goal to not only curb our greenhouse gas emissions but to send less waste to landfills, which are disproportionately located in low income communities and communities of color. The higher rates of pollution from landfills and incinerators in these communities cause disproportionately higher cases of asthma, cancer, and other health issues and compound already existing environmental and racial inequities. The City must do everything in its power to address these environmental injustices. This also means our city needs to move towards a system where we reduce waste in the first place in order to minimize the burden of waste on environmental justice communities (whether in New York City or beyond), and a system where resources are reused and recovered.

NYLCV appreciates the City Council prioritizing these efforts. Below are our comments on a few of the bills being considered today:

Intro 911-A of 2026

NYLCV opposes Intro 911-A of 2026, sponsored by Council Member Carr. The bill would require DSNY to enter into agreements with 6 commercial waste haulers for the borough of Staten Island. It would also delay implementation of the Staten Island zone until February 1, 2028.

This bill undermines the Commercial Waste Zones Law (Local Law 199 of 2019), which a wide group of stakeholders, including the City Council, championed. This law overhauls the City's antiquated and inefficient commercial waste management system by dividing the City into 20 zones, limiting each zone to a maximum of three of private sanitation companies and five carters to provide containerized commercial waste collection services from dumpsters and compactors citywide, all selected through a competitive bid process (awardees). The resulting contracts with the awardees include standards for pricing, customer service, worker safety, environmental health, and requirements to promote the City's commitment to recycling and sustainability.

DSNY has issued proposed rules to implement this law over the past couple of years and this bill will weaken those efforts. The zones that have been implemented include Queens Central, Bronx East, Bronx West, Queens Northeast, Brooklyn South, and Lower Manhattan. Midtown South and Staten Island zones will begin implementation on July 1, 2026, and October 1, 2026, will be the first day of implementation for the Brooklyn North and Upper Manhattan zones. By the end of the year, businesses in half of the City's zones will make the transition to the new system. If 6 commercial waste haulers are permitted in Staten Island, it would diminish route efficiencies, adding polluting truck miles to local streets and highways, harming environmental justice communities and driver and pedestrian safety. Lastly, this bill would jeopardize DSNY's plan to complete citywide implementation of the CWZ law by the end of 2027.

The Commercial Waste Zones law will improve route efficiencies and driver and pedestrian safety, cut down on traffic congestion, and improve air quality. NYLCV strongly opposes Intro 911-A of 2026 and encourages Council Members not to co-sponsor this legislation.

Intro 367 of 2026

NYLCV also supports Intro 367, sponsored by Council Member Nurse, which would require DSNY to accept and process commercial solid waste at all city-owned or operated marine and rail transfer stations, and to publicly report the amount and type of waste received at such stations on an annual basis. NYLCV supports amending this bill so that the timeline balances ambition with practicality, such as amending the bill's timeline to align with the full implementation of the Commercial Waste Zones law.

For decades, environmental justice neighborhoods have borne disproportionate environmental burdens from the concentration of privately run land-based waste transfer stations. DSNY's marine transfer stations (one in Manhattan, two in Brooklyn, and one in Queens) have reduced long-range truck traffic and associated climate and air pollution by containerizing and transporting municipal solid waste via barge and rail.

This bill could help redirect commercial waste away from waste transfer stations located in environmental justice communities and cut down on air pollution and greenhouse gas emissions by using barges to collect commercial putrescible and non-putrescible waste from City-owned, state-of-the-art marine transfer facilities. The concept of this bill also aligns with the City's 2006 and 2026 Solid Waste Management Plan. If adopted, we urge the City to ensure that funding will go towards increased DSNY staffing at the facilities.

Intro 369 of 2026

NYLCV supports the concept of Intro 369, sponsored by Council Member Nurse, which would require DSNY to establish one or more organic waste composting facilities in each borough. As the city makes strides increasing participation in organics recycling, whether residential or commercial, we support identifying and expanding composting facilities and operations, however, as drafted, we have concerns about the practicality of this bill since it would require each borough facility to have a cumulative capacity to process no fewer than 180,000 wet tons of organic waste annually.

We recommend that the bill's vision and goal takes into consideration land use constraints and funding, as well as composting facilities that are already being planned, such as the ones required by Local Law 118 of 2024, which requires DPR to establish composting facilities for plant waste collection. In the longer term, if the Rikers Island Jail Complex is shut down, NYLCV supports reenvisioning the land to become Renewable Rikers, which could include a new composting facility with workforce development opportunities.

NYLCV looks forward to working with the City Council, Mamdani Administration, and stakeholders to ensure we are moving towards our environmental justice and zero waste by 2030 goals.

Thank you for the opportunity to comment.

NYC HOSPITALITY ALLIANCE

June 30, 2026

Testimony of the NYC Hospitality Alliance on Int 0353-2026: Creating a commercial waste zones working group.

On behalf of the NYC Hospitality Alliance, a nonprofit trade association representing thousands of restaurants, bars, and nightlife establishments across New York City, we respectfully submit testimony in support of Introduction 0353-2026, which would establish a Commercial Waste Zones Working Group.

The Alliance has been actively engaged on commercial waste policy for more than a decade, working with multiple administrations, the City Council, sanitation experts, carters, and other stakeholders throughout the development and implementation of the Commercial Waste Zones program. Given the scale of this transition and its impact on businesses across the city, we support creating a formal mechanism to evaluate implementation and provide recommendations for improvement.

As currently drafted, however, the proposed working group does not include direct representation from the small business community, despite small businesses being among the stakeholders most significantly affected by Commercial Waste Zones.

Restaurants, bars, and nightlife establishments generate substantial commercial waste and recycling streams, face unique operational challenges related to waste storage and collection, and will be directly impacted by future policy decisions regarding waste collection, recycling, and organics requirements.

We respectfully urge the Council to amend the legislation to include multiple seats representing small businesses, including from the restaurant, bar, and nightlife industry. The perspectives of businesses that must comply with these requirements on a daily basis are essential to ensuring the successful implementation of Commercial Waste Zones and achieving the program's environmental, safety, and operational goals.

This recommendation is particularly important as the City continues to consider additional waste and organic mandates that would further affect restaurants and other small businesses. Ensuring that those most impacted by these policies have a seat at the table will help policymakers better understand operational realities, identify



New York City Hospitality Alliance
info@thenycalliance.org | www.thenycalliance.org

NYC HOSPITALITY ALLIANCE

unintended consequences, and develop practical solutions that work for both businesses and the City.

In addition to our participation on the stakeholder committee that helped develop the Commercial Waste Zones system, the Alliance has often been appointed by the City Council to serve on advisory boards representing the perspective of our small business sector to provide expertise and insights. These appointments have included the Department of Health Food Safety Technical Advisory Board, the Nightlife Advisory Board, and the Small Business Advisory Commission, among others. We would be proud to serve on this committee as well.

We appreciate the Council's attention to this issue and look forward to continuing to work with policymakers and stakeholders to ensure the successful implementation of Commercial Waste Zones.

Thank you for the opportunity to submit testimony.





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July 2, 2026

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Appelbaum
President,
Retail
Wholesale
Department
Store Union

Henry Garrido
*Executive
Director,*
AFSCME
District Council
37

Lucia Gomez,
*Political
Director,*
NYC Central
Labor Council

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Consortium for
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Eunice Ko
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NYC
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Olivia Leirer
Co-Director,
New York
Communities
for Change

Juanita O.
Lewis
*Executive
Director*
Community
Voices Heard

Jose Lopez

Testimony for Committee on Sanitation and Solid Waste Management

**Council Member Justin Sanchez, Chair
New York City Committee on Sanitation and Waste Management**

Thank you to Chair Sanchez and members of the Sanitation and Solid waste management committee for the opportunity to provide written testimony today.

My name is Jenille Scott, and I am the Climate Director of ALIGN: The Alliance for a Greater New York. We bring together labor, climate, and community for a more just and sustainable New York, and I am writing as one of the lead organizations of the Transform Don't Trash (TDT) Coalition. For over 10 years, The Transform Don't Trash NYC coalition has been dedicated to transforming New York City's commercial trash industry by reducing waste and pollution, fostering clean and healthy communities for all New Yorkers, and creating better working conditions and good jobs for our state's workers.

New York produces over 24,000 tons of waste with over 75% of the City's waste being handled by a small number of low-income communities and communities of color. The vast majority of this garbage generated by businesses and buildings citywide passes through communities with some of the highest rates of asthma such as North Brooklyn, the South Bronx, and Southeast Queens. New York's commercial waste industry became a dangerous 'Wild West' industry where workers were exploited, underpaid and low-income and communities of color were overburdened by trash and pollution. For TDT, our priority is ensuring the solid waste system is reformed and the city handles its waste more equitably, takes advantage of more clean energy solutions using cleaner methods to manage waste and develops systems that promote safer labor practices that support workers and communities.

To this end,

ALIGN strongly supports Intro 367 of 2026 which requires the Department of Sanitation to accept commercial waste at city-owned or operated marine transfer (MTS) stations and city-owned or operated rail transfer stations. The expansion of MTS use has long been an environmental justice priority for our coalition as it will undoubtedly improve the air quality of overburdened communities by reducing emission of harmful pollutants and creating healthier environments for workers. The use of marine transfer stations is a more environmentally sound practice than the use of long haul trucks. In fact, switching to a water based barged system, one barge can replace the capacity of 48 eighteen wheel tractor trailer long haul trucks which can



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*Co-Executive
Director, Make
the Road NY*

significantly reduce the emission of pollutants into communities, reduce truck traffic, noise pollution, safety hazards and odors that simultaneously plague communities with pollution being emitted.

Marine transfer stations would be operated by the New York City Department of Sanitation (DSNY) which creates opportunities for more stringent requirements for compliance with regulations and labor standards so there are less concerns than with privately owned facilities. The Commercial Waste Zone (CWZ) program established under Local Law 199 of 2019 was designed to sharply reduce commercial waste truck mileage citywide and incentivize the use of waste and recycling facilities with high safety and environmental standards, including publicly owned marine and rail-based transfer stations.

ALIGN strongly supports Intro 369 of 2026 which would require the Department of Sanitation to establish one or more organic waste composting facilities in each borough with specific tonnage requirements for compost processing, consider environmental justice factors and consult with local residents in facility siting decisions, and seek to provide employment opportunities to residents. Additionally, expanding organics collection and processing can save the city money in the long term as taking waste to composting facilities is usually cheaper than sending it to landfills and incinerators. Constructing more local facilities throughout the five boroughs will create more local access to composting sites which can aid in reducing vehicle miles traveled by trucks that transport source separated materials to further locations.

Finally, **ALIGN strongly opposes Intro 911-A of 2026** which, if passed, would severely undermine the implementation of the Commercial Waste Zone program. This legislation proposes a delay in the rollout of the Staten Island zone until 2028 and expands the number of haulers to 6 which is beyond the maximum allowed in Local 199 of 2019. By increasing the number of haulers, Intro 911-A would reduce route efficiencies and add more polluting trucks to local streets and highways which would move us backwards and begin a return to a solid waste system that was. A system plagued with unsafe working conditions, dangerous driving practices and multiple forms of pollution such as light, noise, odor which created unhealthy and unsafe environments for workers and community members alike. Expanding the number of haulers would also make it far more difficult and costly for DSNY and the Business Integrity Commission (BIC) to enforce the many safety, recycling, pricing, and transparency rules built into the new CWZ system. Intro 911-A would also allow continued air pollution in environmental justice communities with some of the highest rates of asthma including disadvantaged communities in Brooklyn and New Jersey.

The Transform Don't Trash coalition strongly urges the City Council to pass Intro 367 and Intro 369 and reject Intro 911-A. We look forward to working with the Council and all



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stakeholders to create a more equitable waste system that is healthy and safe for all New Yorkers.

Thank you for your time and consideration.

Jenille Scott
Climate Director



Re: Sanitation Hearing on the following bills: Intro 353, 356, 367, 369 and 911-A

Date: July 1, 2026

I am Clare Miflin, from the [Center for Zero Waste Design](#), a nonprofit organization that has researched best practices for waste containerization around the world, and advocated for NYC to containerize its waste for a decade.

Int. No. 353 - in relation to creating a commercial waste zones (CWZ) working group;

We are strongly in support of this. While we strongly support CWZ we are disappointed by the lack of any increase in diversion in the rollout to date, and the increase in bins staged on sidewalks. Our report [Curb Alert!](#) looked at some of the reasons for this - lack of space inside restaurants for bins, and the high cost and inefficiency for haulers of picking up small amounts of food scraps. We'd love to be on a working group to talk about piloting our proposed solutions - namely waste containers on the street - which is especially important for organic waste given the passage of Intro 31 which authorizes DSNY to require all businesses that produce food waste to separate it. It will also help clear NYC sidewalks from the permanently staged bins which block sidewalks and storefronts, impact business activity, and make life in NYC less pleasant for all.

Int. No. 367 - in relation to requiring the department of sanitation to accept commercial solid waste at city-owned or operated marine transfer stations and city-owned or operated rail transfer stations;

We are in support of any measure to increase the amount of commercial waste going through marine and rail transfer stations and reduce truck traffic.

Int. No. 369 - in relation to establishing organic waste composting facilities in each borough;

We strongly believe in increasing the amount of NYC's organic waste that gets composted, into high quality compost for beneficial reuse. We do think the tonnage amounts listed in the bill are too high, and the timeline is unfeasible. But we want to see a meaningful plan to ramp up community scale composting at least tenfold in the next 4 years, including DSNY financial support for community composting within the DEC registered limits (under 5000 CY or 2500 wet tons per year) like those provided by Big Reuse, LESEC and Earth Matter, and financial support to ramp up the composting efforts provided by community composters citywide, such as those within the [NYC Community Compost Network](#) and by community gardens, schools and more.

We also realize that it is very difficult for large multifamily buildings to collect food scraps in small brown bins collected once a week - especially with a system that has no plastic bags, which is necessary to produce high quality compost. We believe that alternate solutions need to be piloted - including caddy swap systems, dewatering / dehydrating equipment in buildings, and composting in green spaces alongside yard waste to increase composting capacity citywide. Community scale systems need to be integrated with citywide collection.

We also strongly believe that compost needs to be high quality and it needs to be used in NYC - to make soils healthier, so that they infiltrate more stormwater reducing flooding and retain more



moisture so that trees transpire more providing more cooling. Community composting also engages New Yorkers in stewardship for street trees and parks, teaches them about waste reduction and separation and gives tangible opportunities to make their own neighborhoods more resilient - physically and socially.

Int. No. 911-A - in relation to the number of awardees in each commercial waste zone and the implementation date for commercial waste zones

We are against this bill to water down the benefits of CWZ

The Center for Zero Waste Design is ready and willing to help DSNY ensure that this waste containerization in NYC is as successful and impactful as it can be.

Thank you,

A handwritten signature in black ink that reads "Clare Miflin".

Clare Miflin

Executive Director

Center for Zero Waste Design



All SWAB Testimony

Sanitation Committee: July 1, 2026

The Manhattan, Brooklyn, Bronx, and Queens Solid Waste Advisory Boards (SWABs) strongly support **Intro 0356-2026** in its goal of enabling community composters to charge for food scrap drop off and for finished compost.

The SWABs would recommend the following amendments to this bill:

1. Community Composters would be empowered to charge local entities for food scrap pick-up or drop-off services. Community Composters would also be able to sell their finished compost.

The SWABs applaud the New York City Council for proposing this legislation and working to provide Community Composters a more diversified funding model.

The Manhattan, Brooklyn, Bronx, and Queens Solid Waste Advisory Boards (SWABs) also supports **Intro 0353-2026** in its goal of creating a Commercial Waste Zone Working Group with diverse perspectives and experiences. Ensuring that the working group includes carters, employees of carters, individuals with environmental expertise, individuals with environmental justice expertise, and micro haulers will help to ensure that the implementation of CWZ meets important and multifaceted objectives. These goals are referenced within Intro 0353-2026 by highlighting Local Law 199 of 2019.

The SWABs would recommend the following amendments to this bill:

1. The Working Group issues an annual public report to the DSNY Commissioner, the NYC Council, and the public that includes reports and relevant metrics on how CWZs are meeting goals as outlined in LL199 of 2019:
 - a. Impact on Vehicle Miles Traveled (VMT) by Commercial Carters and their subcontractors in each CWZ and in the city in total.
 - b. Estimated reduction in air pollutants and greenhouse gas (GHG) emissions due to the reduction of VMT
 - c. Impact of CWZ on public safety and worker safety through traffic incidents and worker injury reports of both carters and subcontractors
2. The Working Group, in its third and potentially final year of operation, would issue a report detailing how the goals of CWZ have or have not been achieved. The Working Group would provide recommendations on how the city could achieve greater progress. The Working Group would deliver this report to the DSNY Commissioner, the NYC Council, and the public.
3. The Working Group shall be expanded to include Carter customers, at least two from each borough, so that they can meaningfully participate in this process. The Working Group would publish meeting dates and allow representatives from the SWABs, the Department of Transportation, and other relevant organizations to observe meetings.



All SWAB Testimony

Sanitation Committee: July 1, 2026

The Solid Waste Advisory Boards support **Intro. 0367-2026**, which would require the Department of Sanitation to accept and process commercial solid waste at all City-owned or operated marine and rail transfer stations and to publicly report, on an annual basis, the amount and type of waste received at those facilities.

The SWABs believe that, if enacted, Intro. 367 would reduce waste transfer burdens and associated truck traffic in the overburdened communities of Brooklyn Community District 1, Queens Community District 12, and Bronx Community Districts 1 and 2.

Intro. 367 would also strengthen and build upon the achievements of Local Law 152, the Waste Equity Law, which was passed in 2018 and implemented in 2019 to mitigate the disproportionate impacts of truck traffic and waste processing volumes in overburdened community districts. The law also capped new transfer station capacity to ensure that "no other community could become the next dumping ground." For the communities that have long served as the City's dumping grounds, Intro. 367 offers the potential for meaningful relief.

SWAB analysis of the annual Local Law 152 implementation reports published by DSNY indicates that the permitted capacity reductions established under the law remain well above current operating levels in the communities targeted for those reductions.

As a result, a substantial gap remains between permitted capacity and actual usage. Consequently, these communities continue to face the risk of increased truck traffic if commercial waste generation rises because of economic growth, population growth, or other factors. This vulnerability exists even if the City achieves the commercial waste diversion goals proposed in the 2026 Solid Waste Management Plan, which was submitted to the New York State Department of Environmental Conservation for review and approval. The Plan would increase commercial waste diversion from the current 28.1 percent to 54.1 percent. However, because much of the sorting required to achieve diversion occurs on the tipping floor at transfer stations, higher diversion rates alone do not necessarily reduce the volume of waste delivered to these facilities.

Before this very Committee on February 22, 2023, the Department of Sanitation acknowledged the potential value of this proposal, stating, notwithstanding several operational caveats, that:

"Included the MTSs as part of the commercial waste zones RFP. We asked every proposer to indicate if they are interested in using these facilities for waste disposal. As we evaluate the proposals, we will have a better sense of demand for commercial waste disposal at the MTSs. We think that working through the RFP process is the right approach to this issue going forward."

Although the results of that RFP process are not yet available for purposes of this testimony, we request that the evaluation of responses of interest amongst proposers regarding the use of MTSs for commercial waste be made public. Additionally, the Department should conduct a study of the efficacy of the use of the MTSs for commercial waste and make that public by 2027.

Finally, the careful implementation of Intro. 367 could significantly improve the distribution of commercial waste transfer activity among communities across New York City and help complete the work that Local Law 152 began by reducing the current disproportionate burden borne by the City's historically overburdened neighborhoods.



All SWAB Testimony

Sanitation Committee: July 1, 2026

The Manhattan, Brooklyn, Bronx, and Queens Solid Waste Advisory Boards (SWABs) strongly support establishment of local composting capacity in each of the five boroughs. **Intro 369** provides a clear and practical framework for developing a resilient, equitable, and locally based organics management system consistent with the SWABs' ongoing recommendations that New York City prioritize composting solutions for processing residential and commercial organics streams. Intro 369-2026 does this by providing no fewer than 180,000 wet tons of organic processing capacity annually in every Borough.

New York City residents generate roughly one million tons of organic material annually, including food scraps and yard waste. Organics represent the largest component of the residential waste stream at 36% of total residential waste.¹ While NYC has yet to conduct a Commercial Waste Characterization Study, the DSNY in its Draft 2026 SWMP estimates commercial organic waste to be somewhere between 0.7 and 0.9 million tons.² When two million tons of NYC organic materials are disposed of as garbage and sent to landfills, incinerators, or co-digestion facilities, New York City loses the opportunity to recover a valuable resource, promote affordability, and utilize taxpayer dollars as a multiplier in the local economy. Instead these opportunities are wasted and New York City incurs substantial financial, environmental, and public health costs, as well as dumping pollution on other municipalities, including EJ communities.

Currently, the majority of NYC's organic waste is buried, burned, or co-digested. All of these processing methods result in harmful environmental and health impacts. Landfilling or incinerating organics creates noxious methane gas and toxics that pollute recipient communities. Incinerating organics is highly energy inefficient since it is wet and slows the burn. Co-digesting organics with sewage increases the volume of sewage sludge already produced by Waste Water Recovery Facilities. This means NYC has even more toxic sewage sludge or biosolids to dispose of. Current DEP policy is to maximize "beneficial use" of biosolids and that means land application. Applying sewage sludge to land results in farmland, waterways, farm animals, and wildlife being polluted by PFAS, PFOS, microplastics and heavy metals. Municipalities across New York state and the country are waking up to this fact. Indeed, the New York Farm Bureau in 2025 stated its opposition to the land application of biosolids that have detectable levels of PFAS, PFOS and heavy metals.³

Now that curbside organics collection has been implemented citywide, and Commercial Waste Zones – a program that incentivizes source separation of organics – is being rolled out, New York City has a fantastic opportunity to invest in local infrastructure, in outreach & education, and consistent

¹ 2023 NYC Waste Characterization Study, NYC Department of Sanitation, <https://www.nyc.gov/site/dsny/resources/reports/waste-characterization.page>.

² Draft SWMP 2026 Attachments, Attachment E, p155, NYC Department of Sanitation, October 2025.

³ New York Farm Bureau Concludes 2025 Annual Convention, December 8, 2025, New York Farm Bureau, <https://nyfb.org/news/press-releases/nyfb-2025-stacon>.

enforcement so that it can process organic materials responsibly and consistently. We believe that Intro 369, by calling for the creation of local compost operations, is a significant step in the right direction.

The SWABs respectfully recommend the following modifications to strengthen Intro 396:

1. Re-establish the Compost Siting Task Force so that Section 2 (b) of Intro 369 can be realized, and explicitly include representatives from each borough's Solid Waste Advisory Board to ensure meaningful community engagement and local expertise throughout the siting process.
2. Explicitly include nonprofit organizations as eligible entities to participate in the construction, operation, and maintenance of composting facilities.
3. Prioritize partnerships with existing and recently operating community composting organizations and processors, including but not limited to the New York City Compost Network.
4. Ensure that facility siting decisions incorporate environmental justice considerations and prioritize equitable distribution of processing capacity across all five boroughs, avoiding the concentration of infrastructure in communities that have historically borne a disproportionate share of the city's waste burden.
5. Integrate robust public education, outreach into the implementation of new composting facilities. Community-scale processing sites provide residents with visible, hands-on opportunities to understand the value of source separation and build long-term participation in organics programs.
6. Where applicable, integrate workforce development programs into the development and implementation of new composting facilities so that NYC residents are trained and ready to staff composting facilities when they begin operations. Leverage NYC Compost Network organizations as partners in training and recruitment.

Composting, as a process and a product, beneficially sequesters carbon, emits less greenhouse gas than incineration, landfilling, or anaerobic co-digestion, and enriches our urban soils, our people, and our community. The more local the collection, processing, and distribution, the greater the reduction of greenhouse gas emissions and pollution. Local processing of organics as compost recognizes source-separated organics as a valuable resource and diverts this resource away from incineration, landfills, and co-digestion.

A local organics infrastructure will have the additional benefits of utilizing taxpayer dollars as a multiplier, creating good local green jobs within the city instead of exporting that valuable resource as garbage for disposal at great social, environmental, and financial cost.

Intro 369 will encourage equitable distribution of organics processing throughout New York City, dismantling the legacy of overburdening environmental justice communities.

ADDENDUM:

**Manhattan, Brooklyn, Queens and Bronx Solid Waste Advisory Boards (SWABs)
statement on PlaNYC proposed co-digestion solutions
for processing the city's residential and commercial organics streams, June 2023**

The Manhattan, Brooklyn, Queens and Bronx Solid Waste Advisory Boards (SWABs) recommend that the City prioritize composting solutions over the current [PlaNYC](#) proposed co-digestion solutions for processing the city's residential and commercial organics streams.

Composting of food scraps has many important advantages over co-digestion.

Local composting infrastructure offers significant environmental and community benefits. Composting sequesters carbon, generates fewer greenhouse gas emissions than landfilling, incineration, or anaerobic co-digestion, and produces a valuable soil amendment that supports urban agriculture, green infrastructure, stormwater management, and ecosystem restoration.

Intro 369 provides a pathway to align collection programs with processing infrastructure, reduce waste export dependence, create green jobs, and advance the City's climate and environmental justice goals.

In contrast to composting, co-digestion of organics produces methane, carbon dioxide and produces a byproduct of sewage sludge – which is often contaminated with plastics, PFAS, powerful pharmaceuticals, and other toxins, all contaminants that can not be effectively mitigated by treatment processes.

According to the EPA, "To date, 739 chemicals have been found" in various samples of sewage sludge, many of which are known toxins. A list of these is attached to this document for your reference.

Sewage sludge is a poor candidate for application as a fertilizer (56% of sewage sludge is landfilled or incinerated) because many of the chemicals that can be found in it are not only toxic to humans, animals and plants but are also forever chemicals that never go away but accumulate over time. This is why the majority of sewage sludge produced in New York City must be moved out of the city [by rail](#) and truck to be landfilled or burned.⁴

Additionally, anaerobic co-digestion of organics converts nutrients normally found in organic material into methane that when burned is converted into carbon dioxide. Often in the transportation and distribution of methane a portion of it leaks into the atmosphere where it has a 28 times greater impact on atmospheric warming than CO₂.

⁴Biosolids Generation, Use, and Disposal in the United States U.S. Environmental Protection Agency Municipal and Industrial Solid Waste Division Office of Solid Waste EPA530-R-99-009 September 1999, [pg 3](#)

Solid Waste Advisory Boards of Manhattan, Brooklyn, Queens, and Bronx

Co-digestion, if it were to become the primary means of processing our city's organics, would be detrimental to our responsible waste management efforts in New York City and damaging to the health and well-being of the citizens of New York City, New York State, and the planet.

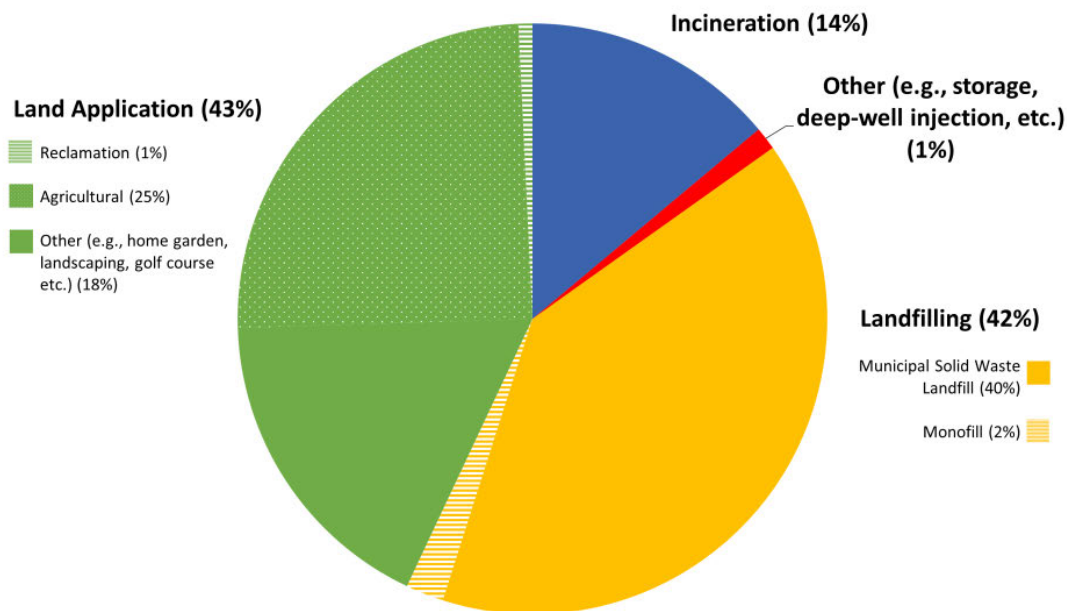
It is for these reasons that the Manhattan, Brooklyn, Queens and Bronx Solid Waste Advisory Boards (SWABs) recommend that the City prioritize composting solutions over the current PlaNYC proposed co-digestion solutions for processing the city's residential and commercial organics streams.

Appendix 1 [EPA: LIST Chemicals in biosolids \(2022\)](#)

[REDACTED]

Appendix 2 - [EPA Biosolids Pie Chart](#) (Update)

**Biosolids Use & Disposal from
2021 Biosolids Annual Program Reports**





I am writing in support of passage of Int 0356-2026 and Int 0369-2026, and enforcement of mandatory organics source separation from other disposable streams. Why? At present, DSNY has corporatized waste export to disposal to landfill and incinerator and put that system on autopilot -- while failing to account for serious adverse health, environmental, and quality of life impacts from the pollution and other problems that organics are currently spreading inside and outside the City because they are being exported as MSW and Commercial Waste. As well as failing to account for these externalized costs, because of NYC's deceptive budgeting process -- where insiders already know during budget hearings that the export costs in the budget are a lowball number, and that there are escalators in export contracts that can/will further drive up costs -- DSNY is failing to openly account even for the direct costs of export. DSNY can do this kind of budgeting because later in the year DSNY can receive the inevitable "cost overruns" to pay corporations under export contracts, and can do so without so much public scrutiny. This is a rotten system that needs to be changed, in part by systematically changing how NYC manages organics disposables through these Intros.

First, capture and composting rates for organics are extremely low, with most organics still winding up in black bag trash exported by rail to landfills and incinerators, with many resulting deleterious impacts on communities within the city and in receiving communities, and only Staten Island's organics actually being composted.

Also, despite the huge export expense, contractual obligations, and a NYS law that mandates containment of waste-by-rail, the vendors DSNY is contracting with to "do waste-by-rail-export right" are cutting corners, and there is a lack of enforcement by DSNY and the LIRR. Where waste-by-rail is stored and hauled in NYC and beyond, this results in foul odors, rats, and pollution from rail cars and locomotives.

At a previous hearing, Hon. Justin Sanchez, Chair of the NYC Council Sanitation and Solid Waste Committee spoke about this problem in his Bronx neighborhood, and DSNY said they would look into dwell times. However, since that hearing CURES continues to receive reports from Fresh Pond Yard and Calamus Circle about stinking rail containers and long dwell times, with the foul stench present 10 blocks away from Calamus Circle and many rat sightings -- the most recent on June 25, 2026 (see email from a resident on page 2).

Based on the documented stench coming from the railroad right of ways, which NYA has acknowledged (see email thread below), we ask DSNY to:

- Make surprise inspections at the transfer stations, along the tracks, and in the railyards where waste is loaded, stored, hauled, and handed off daily among these vendors to see if the rail containers meet DSNY contractual and New York Consolidated Laws, Environmental Conservation Law ENV § 27-0712 standards. MSW cans that are dented, deformed, punctured, rusted, old, or otherwise damaged so that they cannot be sealed and leakproof do not meet these standards, are "defective." NYA also has had a tariff mandating sealed, leakproof containment of MSW. In the past DSNY has taken an active role in maintaining standards that protect residents, as DSNY's Harry Szarpanski did back in 2010, when waste-by-rail was starting to roll through NYC. Harry also sent enforcement to places where C&D-by-rail originated, including greater Long Island. Under Harry's active leadership WM transitioned from vented containment, to sealed, leakproof containment, and, with NYC EDC's and EPA's support, WM used \$1.5M of its own money to procure what is still the only Tier 4 freight locomotive working in NYC. Leaving things up to the vendors isn't working.

----- Forwarded message -----

From: [REDACTED]
Date: Mon, Jun 15, 2026 at 7:28 AM
Subject: Rancid odors from NYA train cars
To: NYA-Community Hotline <nyacommunityhotline@anacostia.com>, CivicsUnited@gmail.com <CivicsUnited@gmail.com>

Dear Community hotline,

This is yet another email to let you know that the New York Atlantic Railroad is creating a hellish environment in our community. Trains full of rancid trash are parked in our neighborhood for hours every day, making it impossible to open our windows or work and recreate outside.

How would you feel if this were happening at your home? Please adhere to the law and maintain your trains in such a way that does not impact working class folks who deserve to breathe clean air.

Warmly,
[REDACTED]
[REDACTED]

----- Forwarded message -----

From: **Szarpanski, Harry** <hszarpanski@dsny.nyc.gov>
Date: Thu, Aug 5, 2010 at 5:01 PM
Subject: Railroad and Waste Issues
To: CURES <civicsunited@gmail.com>, Cc: Doherty, John <jdoherty@dsny.nyc.gov>, CB5-Queens <gnsqb5@nyc.rr.com>, Dolinar, Sarah <sdolinar@dsny.nyc.gov>

Mary, Anthony and Laura,

I'm glad that Sarah Dolinar of my staff and I were able to come out to Middle Village and witness first hand some of the issues of concern to the people residing along the rail line. Thank you Anthony and Laura, and please thank Joseph Dalfino and his wife for their wonderful hospitality.

Solving the problems faced by the communities is a complicated matter, given that there are multiple private and governmental entities and legal jurisdictions involved. While, in my capacity, there are issues that I can more readily address in an attempt to improve the current situation, I obviously cannot promise that I can make all the problems disappear. Having said that, I feel strongly that the status quo is not acceptable.

I will report to you next week on the on-going discussions that I've been having with Waste Management. I also plan to meet with New York and Atlantic and with CSX to discuss potential steps each of those firms can take.

I look forward to working with you. Please do not hesitate to call or email me if you have specific suggestions.

Harry

Harry Szarpanski
Deputy Commissioner
DSNY Bureau of Long Term Export
44 Beaver Street, New York, NY 10004
Phone: 917-237-5501| Fax: 212-269-0788

- Direct 311 calls about foul odors from waste-by-rail to DSNY, not NYA. NYA is a company whose corner-cutting ownership and the adverse impacts that result have been a constant, even as their railroad Presidents have changed over the years.
- Support a competitive procurement for LIRR's Transfer Agreement. The LIRR Transfer Agreement with NYA is expiring in 2027 after an initial 20-year term and a 10-year renewal period, during which there have been numerous, ongoing safety, quality of life, health, and environmental problems from NYA's operations, including:
 - In May 2026, CBS News New York reported what they said is a violation of the Transfer Agreement by NYA during a segment entitled "Maspeth residents fed up with piles of garbage along railroad tracks."
: https://www.cbsnews.com/newyork/video/maspeth-residents-fed-up-with-piles-of-garbage-along-railroad-tracks/?intcid=CNM-00-10abd1h&fbclid=IwY2xjawSK3fNleHRuA2FlbQIxMQBzcnRjBmFwcF9pZBAyMjlwMzkxNzg4MjAwODkyAAEec-q8LypPyt3Coo3Mvo_3SAr2hMiVcO3L7MkqK0MiyhyR6trEJXi_d3DKWmc_aem_ae_IHM2V-EBEQiLLA8IYOQ
 - During the nearly three decades NYA's ownership has had the Transfer Agreement, they have taken on multiple roles in waste-by-rail. NYA has been the common carrier operating under the LIRR's freight rail license. At least a third of NYA's annual carloads are waste-by-rail. NYA's ownership has built two waste-by-rail transfer stations (C&D and coal ash) within MTA-LIRR railyards (Blissville and Farmingdale). As a Member of the American Short Line & Regional Railroad Association NYA is a party to Case #: 1:24-cv-00135-RA-VF in the US District

Court Southern District of New York. The case seeks to overturn New York Consolidated Laws, Environmental Conservation Law ENV § 27-0712. NYA continues to store and haul toxic and noxious waste-by-rail in ways that do not fulfill the law's mandates. And they want a new LIRR Transfer Agreement?

- During the term of the current Transfer Agreement Renewal, NYA maintenance of way workers sued, alleging discrimination. Did the MTA ever get to the bottom of this? <https://www.nytimes.com/2018/02/14/nyregion/railway-workers-lawsuit-discrimination.html>
- NYA's grade crossing collision triggered a Federal Railroad Administration review. The report, which was released after the current Renewal was signed, can be accessed at this link: <https://meng.house.gov/sites/evo-subsites/meng-evo.house.gov/files/FRA%20Report.pdf> NYA's 10-year FRA safety record contains numerous other incidents and accidents. These can be accessed and compared to other railroads in NYA's class at this link: <https://data.transportation.gov/stories/s/dsuf-xcni>.

Following is a recent email thread with NYA, initiated by a resident whose neighborhood is being adversely impacted by DSNY-WM stinking waste-by-rail cans in Fresh Pond Yard. Note that she says her calls to NYA's "Hotline" have been ignored, and that NYA took 9 days to make their excuses.

----- Forwarded message -----

From: **CURES** <civicsunited@gmail.com>

Date: Wed, May 27, 2026 at 9:49 PM

Subject: CURES: New Violation! Trash trains in Glendale - rancid odor in residential area and city park

To: Garcia, Hector <hgarcia@lirr.org>, Marlon Taylor <mtaylor@anacostia.com>

Hector, Glad the strike is settled. We are looping back around here because we never heard from you yet about this problem, and the New York & Atlantic Railway is not addressing community concerns (see below). They are just making excuses, not solving this problem, which continues. The DSNY-WM rail containers are supposed to be sealed and leakproof. They are contaminated and can stink whether they are empty or full. They need to be sealed when they are in transit. The LIRR has two railroads: passenger and freight. Why is this still a problem? What action is the LIRR taking to help **Ms. XXXX** and tens of thousands of others who are being subjected to this filth and the rats it attracts? Mary Parisen-Lavelle, Chair CURES - 718-772-6563

Patte Loper

Sat, May 23, 7:04 PM (4 days ago)

to NYA-Community, me

Dear community hotline response team,

Thank you for your reply. This does not explain why train cars full of garbage are parked in front of our house for hours many days a week, filling our neighborhood with a rotten odor. There is a train of rancid garbage in front of our house right now, and it has been sitting there since 1:45 PM. It's 50 degrees outside right now and still the odor is very strong.

Please adhere to the law and cap these cars adequately so that the odor does not infringe on our quality of life.

Warmly,

Patte Loper
www.patteloper.com

On Wed, May 13, 2026 at 4:01 PM NYA-Community Hotline

<nyacommunityhotline@anacostia.com> wrote:

Hi Patte,

Thank you for your call of May 4th concerning a train positioned that day in the vicinity of your home on Shaler Avenue.

On that date, late in the afternoon, several cars of municipal solid waste along with other outbound cars arrived in the yard for transfer the following day to CSX, and these cars were positioned for outbound movement on the interchange track on the Fremont Secondary. This train service is designed to arrive later in the day and to depart earlier the following day, but due to a track outage east of the CSX bridge, the train was in that position a bit longer on both ends of the move.

The MSW cars are sprayed with a disinfectant that helps keep odors under control.

We apologize for the additional time this train was positioned there, especially on a weekend. We hope you understand that we strive to ensure a timely exchange of this traffic so that does not stay in our possession for any longer than necessary, but the need to complete a track repair on CSX was the major factor impacting our operations at this location on this date.

Thank you for bringing this to our attention, and we will continue to work to ensure our operations proceed as planned, so this is not an issue for you in the future.

NYA Community Response Team
NYACommunityhotline@anacostia.com
(347) 767-2100

Click [here](#) to learn more about New York & Atlantic Railway

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please notify us immediately by return email and promptly delete this message and its attachments from your computer system. There is no waiver of attorney-client or other privilege by the transmission of this message.

From: ReceptionHQ <noreply@receptionhq.com>

Sent: Monday, May 4, 2026 9:38 AM

To: NYA Turnover <NYATurnover@anacostia.com>

Subject: Is This An Emergency: NO Name: Email: Address..

Is This An Emergency: NO

Name: [REDACTED]

Number: [REDACTED]

Email: [REDACTED]

Address: [REDACTED]

Reason for call: Caller advised there is a train of garbage parked outside there house she advised it smells very bad.

Caller ID: [REDACTED]

Note: This message was taken by your Virtual Receptionist from a call to (866) 228-1863. This email was sent from an unattended mailbox - please do not reply to noreply@receptionhq.com. Our customer service email is: support@receptionhq.com

Civics
United for
Railroad
Environmental
Solutions
civicsunited@gmail.com

On Wed, May 13, 2026 at 1:48 PM CURES <civicsunited@gmail.com> wrote:
FYI, Hector, Marlon, NYA is not supposed to be hauling defective WM MSW cans that don't seal, are not leakproof. This is an NYA tariff, no? In the past there have been terrible odor problems due to WM MSW cans being deformed from being old, damaged, or punctured, so they do not seal. Also, state law says the C&D -- with its smelly, toxic, hydrogen sulfide gas emissions from rotting gypsum -- has to have solid covers, and the Transfer Agreement says NYA has to abide by state law. Dwell times for MSW "hot loads" of MSW are not supposed to be lengthy. So what is the locus of the current odor problems?! CURES is receiving complaints not only from this area by Mafera Park, but from residents by Calamus Circle, where the stench has been reported up to 10 blocks away from the tracks. Yes, that is CSX track, but all of those railcars come from Fresh Pond Yard, LIRR's ROW, and DSNY, another public agency, is paying WM for sealed, leakproof containment for MSW. So who is responsible and what are they going to do to end these problems? BTW, Marlon, is the inspector just looking for Commercial Waste/MSW being commingled with C&D, because, as you know, even if that's not happening anymore, the C&D can still stink because of the toxic gas emissions, as well

as the MSW stench from rotting organics in those loads, even if they are not commingled in the same gondola. I look forward to your responses and hearing about the actions you are taking. Mary Parisen-Lavelle, Chair CURES - 718-772-6563

----- Forwarded message -----

From: [name and email address]

Date: Wed, May 13, 2026 at 10:40 AM

Subject: Trash trains in Glendale - rancid odor in residential area and city park

To: <nyacommunityhotline@anacostia.com>

Cc: CivicsUnited@gmail.com <CivicsUnited@gmail.com>, <iris.quinones@mail.house.gov>

Dear NYA Hotline,

Good morning, my name is Patricia Loper. I live at 6453 Shaler Ave in Glendale New York and I have called your hotline numerous times to report strong garbage odors from your train cars in our neighborhood with no response. My understanding is that this is an illegal practice and request that you cover the cars and move them from our neighborhood. We have pride in where we live and deserve to have breathable air, to enjoy our outdoor spaces, and to be able to open our windows. The garbage odor affects Mafera park, where local children play. We have very young children and people with chronic illnesses in our neighborhood.

I am sharing articles that outline how this practice affects residents and that describe the passage of the Train Waste Bill. Please adhere to your legal and civic duty by removing these train cars.

<https://queensledger.com/2023/06/29/glendale-residents-celebrate-passage-of-train-waste-bill/>

<https://qns.com/2016/07/trash-filled-trains-left-parked-in-middle-village-made-for-one-smelly-holiday-for-residents/>

Warmly,

(name) (phone number)

DSNY exports 85% of waste by rail. However, exporting waste by rail instead of using a different transportation mode doesn't reduce the tonnage or toxicity of waste. Rail export doesn't change the fact that waste export funding is going into corporate pockets out of state and out of the US, instead of staying in NYC as fiscal stimulus, multiplying in the local economy and providing other benefits -- as when local composting of organics provides local employment in the form of good "Green" union jobs, compost for NYC's parks, gardens, and trees, and a host of social benefits. And export by rail doesn't eliminate quality of life, health, and environmental

problems in neighborhoods within and outside New York City where all that waste is tipped, processed, hauled, landfilled, and incinerated. DSNY needs to stop pretending that its private vendors are protecting public health, safety, and welfare, sharpen up and enforce export contract standards to ensure that protection, and shift focus and budget to capturing and diverting waste from export at the increased levels that are in DSNY's Solid Waste Management Plan draft. This will reduce current problems and enhance NYC's economy. Following on pages 8-11 are photos and descriptions of waste-by-rail problems to which DSNY and the LIRR are presently turning a blind eye

- With few exceptions the locomotives that haul waste are high-polluting 1970's diesel technology. See below a photo of an NYA train taken by a resident near the Met oval in Queens on March 8, 2026. You can see Waste Management MSW cans being hauled by NYA's ancient locomotives spewing clouds of toxic diesel emissions. Such waste-by-rail movements take place day after day. Spiking diesel prices also impact railroads and other aspects of waste export.



- Municipal Solid Waste rail containers too often emit the stench rats love, because a third of the material in this black bag trash is still organics, old and damaged cans are not being maintained and replaced, and dwell times are too long. Cutting these corners puts more money in private pockets, while harming residents in communities inside and outside the City, and short-changing taxpayers and DSNY. Below is a photo of dented and punctured Waste Management MSW cans being hauled on the Bay Ridge line by PS 68 in Queens, NYC. These cans are defective, not sealed and leakproof. Because they are

contaminated with organics, the cans stink whether they are full or empty. The IBX will share the railroad right of way with waste-by-rail, adversely impacting the "rider experience."



- Construction & Demolition Debris, C&D, can contain heavy metals, PCBs, asbestos, and other toxics. Yet C&D is crushed, dumped, and hauled in open top rail cars with floor drains, resulting in emissions of toxic blowoff, leachate, and gas in neighborhoods of NYC. To protect public safety a 2023 New York State law mandates solid covers for these

rail cars. However, the National Waste and Recycling Association - New York State Chapter, Association of American Railroads, and American Short Line and Regional Railroad Association (ASLRRA) filed a lawsuit in January 2024 to stop this modest public protection. NYA is a member of the ASLRRA. November 2026 is when discovery is due. So, apparently the case will not be heard in 2026, a full two years after the law went into effect. Toxic C&D pollution continues to be dumped on NYC neighborhoods and other communities because private investors -- including international Macquarie/WIN Waste Innovations -- don't want to spend money using rail cars with solid covers.



CURES - Civics United for Railroad Environmental Solutions

Published by Mary Arnold · January 31 at 1:04 PM · 🌐

...

Private investors are making \$\$\$\$\$ by processing, hauling, and landfilling waste at the least cost to themselves. Investors dump costs on residents and communities in the form of air, land, and water pollution and health costs. When are they going to cover their rail cars with "hard tarps", as required by NYS law starting January 1, 2024?! As you can see from this promotional photo, these rail cars are not covered! They are shamelessly advertising one way they are harming families for profit! [Assemblywoman Jenifer Rajkumar](#)



WIN Waste Innovations

January 26 at 4:12 PM · 🌐

[#FunFactFriday](#): Did you know WIN Waste is one of the largest integrated waste-by-rail companies in North America? 🚂♻️ We move more than 4 million tons of waste annually through our rail-served transfer stations — avoiding the carbon emissions of thousands of truck trips. Now that's a WIN. 💯

[#winwaste](#) [#performancefortheplanet](#)



This muffin top load of C&D in a WIN Waste gondola is being hauled in NYC, covered only by pervious orange netting. The article below cites NYS law about the toxics found in C&D.

NYC Council Member Holden to NYS: FIX WASTE-BY-RAIL PROBLEMS *Or Be DENIED New Transfer Station Permit*

CURES
Civics United for Railroad Environmental Solutions

*By Mary Parisen-Lavelle, Chair
Civics United for Railroad Environmental Solutions*

Here we go again, folks. The New York State Department of Environmental Conservation (DEC) is reviewing another permit application for a new waste-by-rail transfer station: Peconic Environmental Services. The permit application proposes shipping the tonnage of up to 5,300 additional large, Plate F rail gondolas of "C&D Residue" into NYC from Suffolk County annually. All of these rail cars of landfill-bound waste will be handled by the New York & Atlantic Railway and CSX in and around Fresh Pond Yard.

In response to the permit application, on October 20, 2022, Council Member Bob Holden submitted a blistering public comment to DEC. (see Letters, page 12) He said the permit should be denied unless New York State addresses community problems that already can be anticipated. Council Member Holden's letter specifically refers to adverse community impacts caused by a lack of state waste-by-rail containment standards. What does the Peconic Environmental Services application disclose that points to how this industry dumps problems and costs on

The railroad compliant tarps used today, under the CSX tariff, are pervious orange mesh that allows precipitation to enter the rail gondola.

neighborhoods? What happens to your family when they load waste odors, blowoff, and leachate into rail gondolas with open tops and drains in the bottom?

The problem of foul odors coming from rail gondolas of "C&D Residue"

The Peconic Environmental Services permit application discloses information that points to why rail cars hauling "C&D Residue" can emit foul odors and leachate. The application discloses that the transfer station dumps its potential leachate and odor problems into rail gondolas that they ship "away" into your neighborhood! The application says: "FLOOR DRAINS - The facility shall not collect leachate and store it in underground tanks. These are prone to clogging and produce foul odors. Instead, the concrete slab shall be pitched towards the center region of the tipping floor. Moisture is typically absorbed within the C&D material. In the event standing water is discovered, absorbent pads or booms shall be utilized and then disposed of with the C&D material."

The problem of stinking leachate draining out the bottom of the rail car

The Peconic Environmental Services permit application says they will use the same type of open rail gondolas that are already being used for "C&D Residue" by-rail, with railroad compliant tarps. These gondolas are open at the top and have drains in the bottom. The railroad compliant tarps used today, under the CSX tariff, are pervious orange mesh that allows precipitation to enter the rail gondola. Because of the way the bottom of the rail gondolas are shaped, and because they are never completely emptied, filthy leachate both collects in the bottom of the rail car and drains out in your neighborhood.

The problem of waste blowoff polluting community air

Since the waste is not completely contained within the rail cars, the cars emit clouds of dusty C&D blowoff in neighborhoods, as they are hauled, classified, and the wind blows through them. And yet the Peconic Environmental Services application says they will test it... "(e) Should any fill material or residue leave the facility for reuse, it shall be analyzed in accordance with the sampling and analysis requirements outlined in section 360.13(e) of Part 360. A minimum of one analysis is required for every 1000 cubic yards of fill material and must follow the criteria outlined in section 360.13(f) of Part 360"

Why would the applicant have to promise to test? What is NYS concerned about finding in the "C&D"? According to what is in the list below, it's toxic pollution! This material is crushed and dumped into rail gondolas that regularly emit possibly contaminated dust that no one is testing into community air!

Analytical parameters. Fill material samples must be analyzed for:

- (i) the Metals, PCBs/Pesticides, and Semi-volatile organic compounds listed in subdivision 375-6.8(b) of this Title;
- (ii) asbestos if demolition of structures has occurred on the site;
- (iii) volume of physical contaminants, if present, based on visual observation; and
- (iv) Volatile Organic Compounds listed in subdivision 375-6.8(b) of this Title, if their presence is possible based on site events such as an historic petroleum spill, odors, photoionization detector meter or other field instrument readings.

N.Y. Comp. Codes R. & Regs. Tit. 6 § 360.13 - Special requirements for predetermined beneficial use of fill material

Senator Joe Addabbo, Assembly Members Hevesi and Barmwell, and Congress Member Grace Meng have tried to enact legislation to establish standards for containment of waste in a rail car to protect communities. However, today all that "protects" our families from what is in the "C&D Residue" that blows and drains out of rail gondolas is that orange mesh. Thank you, Council Member Holden for telling New York State this has to stop!

What does the Peconic Environmental Services application disclose that points to how this industry dumps problems and costs on neighborhoods?

What happens to your family when they load waste odors, blowoff, and leachate into rail gondolas with open tops and drains in the bottom?

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During the term of the current Transfer Agreement Renewal, NYA maintenance of way workers sued, alleging discrimination. Did the MTA ever get to the bottom of this? To date the MTA has not submitted a new Transfer Agreement to the NYS Comptroller for review. To the best of our knowledge the transfer agreement has not been advertised in the New York State Contract Reporter. These are procurement and contracting requirements under NYS Public Authorities Law. CURES has in writing that the MTA OIG is aware of these concerns and has communicated with the LIRR about this. A new transfer agreement offers the MTA and DSNY opportunities to put waste-by-rail on a better footing.

<https://www.nytimes.com/2018/02/14/nyregion/railway-workers-lawsuit-discrimination.html>

2 Broadway
New York, NY 10004
212 878-7000 Tel



Metropolitan Transportation Authority

State of New York



April 5, 2018

Hon. Catherine Nolan
Member of Assembly, 37th District
47-40 21st Street, Room 810
Long Island City, NY 11101

Hon. Michael Miller
Member of the New York State Assembly
83-91 Woodhaven Boulevard
Woodhaven, New York 11421

Hon. Joseph P. Addabbo, Jr.
159-53 102nd Street
Howard Beach, NY 11414

Re: Metropolitan Transportation Authority ("MTA") / Long Island Rail Road
Company ("LIRR") / New York & Atlantic Railway Company ("NYAR") -
Allegations of Discrimination, Wage and Safety Violations by NYAR

Dear Assemblywoman Nolan, Assemblyman Miller and Senator Addabbo:

I am writing to you in connection with your letter to MTA Chairman Joseph Lhota, dated February 21, 2018 regarding the above-referenced matter. Chairman Lhota has asked me to thank you for writing to him, and to respond to the concerns raised in your letter.

Since the September 2016 Federal Railroad Administration report which was critical of NYAR and made several recommendations for policy and infrastructure changes, NYAR has taken a series of actions to improve its safety practices and culture. These actions, many of which were suggested by LIRR, include (among others) the appointment of new personnel charged specifically with oversight of safety practices and training, the establishment of labor/management safety committees, the retention of an outside firm to conduct periodic safety assessments, and the rehabilitation of grade crossings along the Lower Montauk Branch of the LIRR (a freight-only corridor used regularly by NYAR trains).

In light of these steps, the allegations reported in the New York Times article came as a total surprise to MTA and LIRR. Nonetheless, we agree with you that these new allegations are very troubling and, if proven to be true, call into question the business integrity of NYAR and whether it should be permitted to continue providing rail freight services over LIRR's network.

The agencies of the MTA

MTA New York City Transit
MTA Long Island Rail Road

MTA Metro-North Railroad
MTA Bridges and Tunnels

MTA Capital Construction
MTA Bus Company

Hon. Catherine Nolan
Hon. Mike Miller
Hon. Joseph Addabbo, Jr.,
April 5, 2018
Page 2

In summary, the New York Times reported that 18 individuals initiated a civil lawsuit against NYAR's parent Anacostia Rail Holdings Company (ARH), NYAR, and several of ARH's or NYAR's managers. These individuals, who claim to have been employed by NYAR, allege that NYAR routinely discriminated against them because they were immigrants or were perceived as immigrants, in violation of various anti-discrimination, wages and hours, and worker safety laws.

As the owners of property over which NYAR operates, and as firm proponents of treating all workers fairly, without regard to race, ethnicity, national origin or immigration status, MTA and LIRR are concerned about these allegations and believe that an independent investigation may be necessary to determine whether the allegations are true and, if so, whether the violations are continuing. As such, within two days of the article's publication, LIRR made a formal request to the New York State Department of Labor to conduct such an independent investigation into those allegations that fall within its jurisdiction, including allegations relating to minimum wages, overtime wages, and the provision of wage statements and wage notices as required by the New York Labor Law. LIRR will, of course, cooperate with any such investigation. In addition, LIRR is consulting with the MTA Inspector General about whether additional investigative measures are appropriate.

Please be assured that as the civil litigation and related investigations move forward, MTA will continue to monitor developments and treat this matter as one of the utmost importance. Thank you again for writing to the MTA and for sharing your concerns with us.

Sincerely,



Anita L. Miller
Chief Employee Relations
and Administrative Officer

cc: Joseph J. Lhota, MTA Chairman

Again, please, take DSNY's destructive, harmful waste-by-rail export system off autopilot. Private corporate owners and shareholders who are profiting by externalizing costs want to

keep their tonnage up and keep NYC taxpayer dollars flowing into US and international private pockets. Please shift existing DSNY export funding to organics source separation and local, true composting, which will result in less waste export tonnage by whatever transportation mode. Put this funding to work capturing and diverting compostables for beneficial purposes within NYC and for economic enhancement and affordability instead. To the much lesser extent that waste export is needed -- since more than 30% of current waste export is organics -- please hold the waste-export-by-rail vendorship to account for the sake of taxpayers, and for residents' health and quality of life, including residents in EJ and Disadvantaged Communities inside and outside the City.

Thank you.

Mary Arnold, CURES Board Member, civicsunited@gmail.com, July 4, 2026

My name is Joyce Bialik and I am a member of the Manhattan Solid Waste Advisory Board and WE ACT for Environmental Justice. I am here today to suggest how the City's support of composting can also support one of the values of the Mayor's Grocery Stores, namely, making healthy foods accessible to low income residents. Many of the farms and gardens currently in our City do their own composting and use the compost to grow fruits and vegetables. If clean wholesome food scraps are used to make clean compost we get clean wholesome nutritious fruits and vegetables. Studies have shown that some of the chemicals found in produce are forever chemicals, and that small children and pregnant women are particularly vulnerable. (If compost is used for growing without the addition of synthetic chemicals the resulting produce would be pesticide and herbicide free, although to attain organic status a farm requires organic certification).

Currently, the City's farms and gardens are not distributed evenly across the City; nor are they all selling their produce directly to the public or using some of their land to create compost.

The City could build a system that maps the current distribution of these farms and community gardens and subsidizes the development of additional growing and composting spaces -- wherever possible -- in areas where they are lacking. The City also should guarantee ongoing support for the compost spaces that currently exist. Priority for the farms, gardens, and compost spaces would be given to low income neighborhoods, and the City would develop a means for each customer to pay directly to the farm or garden at a rate commensurate to that used in the City grocery stores. The City would monitor the growing and selling to ensure the availability of healthy affordable products, that are grown only with contamination free compost from clean wholesome food scraps. To promote access to these farms, gardens, and compost spaces the City would publicize their presence and use a map showing their location and the types of produce that they are selling.

Lower East Side Ecology Center
Testimony to New York City Council
Committee on Sanitation and Solid Waste Management
July 1, 2026

The Lower East Side Ecology Center has pioneered community-based urban sustainability since 1987. As a founding member of the NYC Community Compost Network, we work alongside partners across the five boroughs to build local composting systems that create green jobs, strengthen communities, and advance New York City's climate goals.

We urge the Council to pass Int. No. 356 and Int. No. 369, and to continue supporting community composting.

Int. No. 356 is a critical step toward recognizing and legitimizing the work of community composters. For decades, community-based organizations have operated in a regulatory gray area—collecting, processing, and distributing compost without clear pathways for sale or cost recovery. Allowing community composters to sell compost and compost-related products would provide a modest but meaningful revenue stream that supports program sustainability. It would also acknowledge the value of compost as a finished product, not just a waste management outcome.

Equally important, this bill helps formalize a sector that has consistently delivered high-quality, locally produced compost while engaging residents directly in climate solutions. This legislation can ensure that community composting remains accessible, while also enabling organizations to grow and innovate.

Int. No. 369 addresses another critical need: expanding composting infrastructure across all five boroughs. As the City continues to roll out curbside organics collection, it is essential that we also invest in decentralized, community-scale processing sites. Large-scale facilities alone cannot meet the full range of needs across New York City, particularly when it comes to education, local engagement, and the use of compost within neighborhoods.

Establishing composting facilities in each borough creates an opportunity to build a more resilient and distributed system. Especially one that reduces transportation impacts, increases processing capacity, and ensures that all communities have access to the benefits of composting. These facilities should include and prioritize community-based operators, who bring deep local knowledge, trusted relationships, and a proven track record of public engagement.

Together, these two bills represent a thoughtful and necessary investment in the future of organic waste management in New York City. They recognize that composting is not just a sanitation function, but a community asset that delivers environmental, social, and economic benefits.

Sincerely,
Renee Crowley
Deputy Director
Lower East Side Ecology Center

PORT RICHMOND

North Shore Alliance

A Civic Association which is committed to revitalize the Original Shopping District in Port Richmond by addressing issues in our community.

128 Port Richmond Avenue-Suite; 2G Staten Island, NY10302

FaceBook: Port Richmond Strong

Twitter: @PortCivic Portrichmondstrongcivic@gmail.com

David Carr; Councilmember
50th., District; Staten Island
900 South Avenue, Suite 403
Staten Island, NY 10314

June 29th.,2026

RE: Support for Proposed Int. 911-A – Commercial Waste Zone Reform for Staten Island

Dear Members of the Staten Island Delegation and Honorable Council Members,

On behalf of the Port Richmond North Shore Alliance, we write in support of **Proposed Int. 911-A**, legislation sponsored by Staten Island's Council Members that would increase the number of authorized commercial waste providers operating within Staten Island's Commercial Waste Zone and delay implementation of the current plan.

While we support the City's goals of improving safety, efficiency, and environmental outcomes through the Commercial Waste Zone program, we remain deeply concerned that limiting Staten Island to only three authorized waste providers will significantly reduce competition, customer choice, and long-term flexibility for the thousands of businesses that depend upon reliable and affordable waste collection services.

New York City should encourage a competitive marketplace that allows qualified businesses to participate in providing services at fair and competitive prices. Competition benefits consumers, promotes innovation, improves customer service, and helps control costs for small businesses already facing substantial economic pressures.

Restricting Staten Island businesses to only three carting companies creates the risk of higher costs, reduced service quality, and limited responsiveness to the unique needs of individual businesses and commercial corridors. Once implemented, businesses may have very limited alternatives for the duration of the program, leaving them with little recourse and increased in prices for services.

Staten Island's business community is unique and diverse, consisting largely of small and family-owned businesses that rely upon flexibility and responsive customer service. The current structure may unintentionally place these businesses at a disadvantage compared to businesses operating in more competitive environments.

Proposed **Int. 911-A** provides a practical and balanced approach by expanding the number of authorized providers while allowing additional time to evaluate the long-term impacts of the program before full implementation. This legislation protects competition, preserves consumer choice, and ensures quality service at reasonable prices.

We respectfully urge the Staten Island Delegation and our Council Members to support Proposed Int. 911-A and advocate for a commercial waste system that balances operational efficiency with competition, affordability, and customer choice.

Thank you for your consideration and for your continued advocacy on behalf of Staten Island's business community.

Respectfully submitted,

PORT RICHMOND NORTH SHORE ALLIANCE
128 PORT RICHMOND AVENUE SUITE-2G
STATEN ISLAND, NY 10302

PORT RICHMOND

North Shore Alliance

A Civic Association which is committed to revitalize the Original Shopping District in Port Richmond by addressing issues in our community.

128 Port Richmond Avenue-Suite; 2G Staten Island, NY10302

FaceBook: Port Richmond Strong

Twitter: @PortCivic Portrichmondstrongcivic@gmail.com

Kamillah Hanks Councilmember
49th. District of Staten Island
130 Stuyvesant Place
Staten Island, NY 10301

June 29th.,2026

RE: Support for Proposed Int. 911-A – Commercial Waste Zone Reform for Staten Island

Dear Members of the Staten Island Delegation and Honorable Council Members,

On behalf of the Port Richmond North Shore Alliance, we write in support of Proposed **Int. 911-A**, legislation sponsored by Staten Island's Council Members that would increase the number of authorized commercial waste providers operating within Staten Island's Commercial Waste Zone and delay implementation of the current plan.

While we support the City's goals of improving safety, efficiency, and environmental outcomes through the Commercial Waste Zone program, we remain deeply concerned that limiting Staten Island to only three authorized waste providers will significantly reduce competition, customer choice, and long-term flexibility for the thousands of businesses that depend upon reliable and affordable waste collection services.

New York City should encourage a competitive marketplace that allows qualified businesses to participate in providing services at fair and competitive prices. Competition benefits consumers, promotes innovation, improves customer service, and helps control costs for small businesses already facing substantial economic pressures.

Restricting Staten Island businesses to only three carting companies creates the risk of higher costs, reduced service quality, and limited responsiveness to the unique needs of individual businesses and commercial corridors. Once implemented, businesses may have very limited alternatives for the duration of the program, leaving them with little recourse and increased in prices for services.

Staten Island's business community is unique and diverse, consisting largely of small and family-owned businesses that rely upon flexibility and responsive customer service. The current structure may unintentionally place these businesses at a disadvantage compared to businesses operating in more competitive environments.

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Twitter: @PortCivic Portrichmondstrongcivic@gmail.com

Frank Morano; Councilmember
51st. District of Staten Island
2955 Veterans Rd W #2, Staten Island, NY 10309

June 29th.,2026

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Dear Members of the Staten Island Delegation and Honorable Council Members,

On behalf of the Port Richmond North Shore Alliance, we write in support of Proposed **Int. 911-A**, legislation sponsored by Staten Island's Council Members that would increase the number of authorized commercial waste providers operating within Staten Island's Commercial Waste Zone and delay implementation of the current plan.

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Respectfully submitted,

PORT RICHMOND NORTH SHORE ALLIANCE
128 PORT RICHMOND AVENUE SUITE-2G
STATEN ISLAND, NY 10302



Reimagining school cafeterias as climate action hubs where students drive equitable zero-waste solutions: reducing food waste, supporting local composting, and eliminating plastics through science, civic engagement, media, and the arts!

Testimony of Rhonda Keyser, Cafeteria Culture to

New York City Council Committee on Sanitation and Solid Waste Management

Regarding Intro 369

City Hall Committee Room

July 1, 2026

I'm Rhonda Keyser, Program and Policy Director with Cafeteria Culture. Our team works together with our Compost Coordinator, Jaimere Rush to shape and evaluate our food scraps collection pilot.

One of the biggest lessons from our pilot is how efficient it is to collect food scraps from schools. We believe Intro 369 is both achievable and practical, and our growing pilot demonstrates that.

We recognize that our perspective differs from DSNY's, but this is a new idea. And in a democracy, new ideas require conversational generosity, so we hope to continue in conversation as we expand our system that is already proving successful.

In just four schools, our one Compost Coordinator diverted more than a ton of food scraps in only a few months.

Reaching that same amount by asking individual households to separate and set out their food scraps would require educating and engaging hundreds – if not thousands of households.



Schools generate large, consistent volumes of food scraps every day, making them one of the easiest and most effective places to recover organics. By integrating schools into neighborhood composting systems, students learn WHY and HOW to divert their food scraps through hands-on education with real-world application.

And while teaching students the virtue of sorting their waste through “recycling” programs has some merits, our program supports students as they experience the benefit of their own food scraps as resources while reducing their own carbon footprint in real time. Working with local



composting sites to break down their own food scraps, our students reap the rewards in their own school gardens actually turn what is usually considered waste into a resource, leading to soil and food sovereignty.

When our PS/MS 46 students visited the compost site Polo Grounds for the first time, they asked Domingo Morales, CEO of Compost Power if he owned the site, to which he replied that because NYCHA sites are funded by tax dollars, that we all own the site. The students beamed, proud to realize that they have a stake in their own future and their own ability to create positive climate action.

New York City can divert significant amounts of food waste while reaching students, who bring composting habits home to their families. It's a smart investment that delivers immediate results and builds long-term participation. Our program disrupts the truck-based, harmful and polluting industrial model of waste management, offering a new solution. Another world is possible!

Thank you.





Reimagining school cafeterias as climate action hubs where students drive equitable zero-waste solutions: reducing food waste, supporting local composting, and eliminating plastics through science, civic engagement, media, and the arts!

Testimony of Jaimere Rush Cafeteria Culture to

New York City Council Committee on Sanitation and Solid Waste Management

Regarding Intro 369

City Hall Committee Room

July 1, 2026

Good morning, and thank you for the opportunity to testify. I am Jaimere Rush from Cafeteria Culture, and I urge you to pass Intro 369, which would require compost processing capacity in every borough of New York City.

This year, Cafeteria Culture launched a pilot program that showed what local composting can accomplish. I was hired as a Compost Coordinator to collect cafeteria food scraps, educate students about composting, and transport those scraps to nearby community composting sites or on-site tumblers.

Since late October 2025, I have led students to divert more than 1 TON of food scraps from just 4 schools. Every pound of compost we use in the school gardens we created at these schools comes from Compost Power's local composting sites.



So instead of trucking our food waste across the city and burdening other communities, we turned their food scraps into a local resource that nourishes our gardens, supports environmental education, and strengthens our neighborhoods.

This is exactly why Intro 369 matters.

Local composting reduces unnecessary truck traffic, builds resilient neighborhood infrastructure, and creates opportunities for education, jobs, and community engagement. Our pilot proves that integrating school



Cafeteria Culture, c/o Lower Eastside Girls Club, 402 E 8th St, New York, NY 10009

A Project of Fund for the City of New York, 121 Avenue of the Americas, 6th Floor, NY, NY 10013

cafeterias into neighborhood composting is practical, efficient, and scalable.

Just one Compost Coordinator working with four schools diverted more than a ton of organic material in a matter of months. Imagine what EVERY school in every borough could achieve with the right infrastructure.

We ask you to please pass Intro 369 and invest in a composting system that keeps resources where they are generated and benefits every New York City community. Thank you.





From: Faztec Industries [REDACTED]

Sent: Monday, June 29, 2026 12:23 PM

To: [REDACTED]

Subject: [EXTERNAL] Opposition to the Commercial Waste Zone Program - 3 Guys Sushi

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report suspected phishing emails with the Phish Alert Button or forward them to [REDACTED] as an attachment.

Date: June 29, 2026

The Honorable Erica Cohen

New York City Council

Re: Opposition to the Commercial Waste Zone Program and Preservation of Customer Choice

Dear Council Member Erica Cohen,

I am writing as a business owner and constituent to express my strong opposition to the implementation of the Commercial Waste Zone (CWZ) program as it is currently structured for Staten Island.

For many years, my business has relied on a waste management provider that has consistently delivered dependable service, competitive pricing, and responsive customer support. Under the proposed CWZ system, I may be forced to abandon a company that has earned my trust and instead choose from a limited number of providers selected by the City.

As a business owner, I believe I should have the right to choose the company that services my business. Competition benefits customers by encouraging better service, fair pricing, accountability, and innovation.

I respectfully urge you to support measures that preserve customer choice and allow additional qualified carting companies to participate in the Staten Island zone.

I respectfully ask that you oppose the implementation of the CWZ program in its current form and support legislation that allows businesses to retain the freedom to select the waste management company that best meets their needs.

My business has been serviced by Faztec Industries for 4 years, and I am extremely satisfied with their service and wish to retain them as my provider.

Thank you for your time and consideration.

Sincerely,

Business Name: 3 Guys Sushi

Business Owner: Daxiang lin

Address: 530 Forest Ave

Phone: [REDACTED]

Email: threeguyssushi@yahoo.com

Testimony Regarding Intros 0353 and 0911-A

Proposed Bills to Create a CWZ Working Group and Adjust the CWZ Framework within Staten Island

Good afternoon,

My name is Josh Haraf and I serve as Market Vice President for New York City at Action Environmental Services, a subsidiary of Interstate Waste Services. Thank you for the opportunity to deliver testimony regarding the Bills considered during today's hearing.

With respect to Bills 0075, 0356, 0367, and 0369, Action Carting supports reasonable legislation that encourages street cleanliness, expands access to composting, and promotes economically feasible disposal options. Action is poised to support commercial businesses with relevant compliance education in alignment with the progression of these Bills.

Furthermore, Action Carting staunchly supports Bill 0353 introduced by Councilwoman Nurse. The creation of a Commercial Waste Zones working group would structure a healthy dialogue amongst critical stakeholders who are responsible for the successful realization of Local Law 199's key objectives. Awarded Carters engage with the DSNY to successfully onboard zones, however there are limited opportunities to provide *or* absorb more holistic feedback amongst industry colleagues. This working group would be a productive forum to discuss:

1. Customers' experiences transitioning to CWZ service agreements;
2. Operational best practices and technologies that prioritize safety; and
3. Opportunities for efficiency improvements within an evolving regulatory landscape.

Action Carting supports opportunities to enhance essential services provided to NYC businesses, and a CWZ working group would further underscore the importance of collective, continuous improvement within the fabric of the Program.

In contrast, Action Carting staunchly opposes the adoption of Bill 0911-A, which would unnecessarily alter the operating framework and timely implementation of the CWZ program. This Bill undermines Local Law 199's intended goals by diluting the required caliber for CWZ Awardees and neglecting the DSNY's ability to course-correct underperforming zones. Staten Island's residents and businesses deserve to benefit from reduced truck traffic, vigilant safety standards, and transparency in the same regard as other boroughs. Therefore, Action Carting encourages this Committee to avoid establishing a harmful precedent by disrupting the Program's potential before the zone even launches.

Thank you for your time, attention, and consideration.

Respectfully submitted,

Josh Haraf
Vice President of NYC Market
Action Environmental Services / Interstate Waste Services
JHaraf@interstatewaste.com



**Testimony of Hillary Aidun of Earthjustice to the
New York City Council Committee on
Sanitation and Solid Waste Management
July 2, 2026**

My name is Hillary Aidun and I am an attorney at Earthjustice, a national environmental law organization. I am testifying in support of Intro 369, which would require the Department of Sanitation to establish one or more organic waste composting facilities in each borough.

Composting is a critical component of New York City's efforts to manage waste and to reduce greenhouse gas emissions and local pollution. Diverting organic waste from landfills avoids significant greenhouse gas emissions. Decomposition of organic waste in landfills emits methane, a powerful greenhouse gas, and transporting waste to landfills upstate and out of state generates additional greenhouse gas emissions.

Landfills are also harmful to host communities. Landfills can emit hazardous air pollutants, volatile organic compounds, and particulate matter, which can cause and contribute to serious health conditions such as cancer, asthma, and premature death. Landfills can also pollute groundwater and nearby water sources with harmful contaminants such as PFAS, which threaten human and aquatic health. Odors from landfills can also impose serious burdens on nearby communities.

Composting is a beneficial alternative to landfilling. Some organic waste in New York City is currently anaerobically digested and purified to create biomethane that is injected into the gas distribution system to supplement fossil gas. However, biomethane, when combusted in homes and businesses, creates the same greenhouse gas emissions and indoor air pollution as fossil gas. Nor is incineration a solution; incinerating waste also generates significant greenhouse gas emissions and local air pollution that threatens communities.

We commend the City Council for taking steps to expand composting as a solution to the environmental justice and climate challenges posed by solid waste. Thank you.

From: [Sabrina Massey](#)
To: [Testimony](#)
Subject: [EXTERNAL] Int. 0075-2026
Date: Tuesday, June 30, 2026 5:56:46 PM

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Hi my name is Sabrina Massey, my phone number is [REDACTED], the hearing is July 01,2026, at 10:00 am. I would like to testify in support of this bill. I think the enforcement should be enforced to help with the cleanliness of the sidewalks. I complain about this all the time, the commercial owners of the businesses located in my neighborhood don't clean outside their businesses. The owners come to the neighborhood open up their businesses and start working, they don't even try to clean. At the end of their work day, they leave the garbage and trash out in front of their businesses and don't clean it. It's not fair to the people who live in the neighborhood and have to see this, and live with this.

Thank you
Sabrina Massey

From: [Faztec Industries](#)
To: [Morano Public](#)
Subject: Opposition to the Commercial Waste Zone Program - Arthur kill plaza
Date: Monday, June 29, 2026 9:36:20 AM

[EXTERNAL]

Date: June 29, 2026

The Honorable Frank Morano
New York City Council

Re: Opposition to the Commercial Waste Zone Program and Preservation of Customer Choice

Dear Council Member Frank Morano,

I am writing as a business owner and constituent to express my strong opposition to the implementation of the Commercial Waste Zone (CWZ) program as it is currently structured for Staten Island.

For many years, my business has relied on a waste management provider that has consistently delivered dependable service, competitive pricing, and responsive customer support. Under the proposed CWZ system, I may be forced to abandon a company that has earned my trust and instead choose from a limited number of providers selected by the City.

As a business owner, I believe I should have the right to choose the company that services my business. Competition benefits customers by encouraging better service, fair pricing, accountability, and innovation.

I respectfully urge you to support measures that preserve customer choice and allow additional qualified carting companies to participate in the Staten Island zone.

I respectfully ask that you oppose the implementation of the CWZ program in its current form and support legislation that allows businesses to retain the freedom to select the waste management company that best meets their needs.

My business has been serviced by Faztec Industries for 4 years, and I am extremely satisfied with their service and wish to retain them as my provider.

Thank you for your time and consideration.

Sincerely,

Business Name: Arthur kill plaza
Business Owner: Christine Calabrese
Address: 4916 Arthur kill road



From: [Faztec Industries](#)
To: [District49](#)
Subject: Opposition to the Commercial Waste Zone Program - Avocado sushi
Date: Monday, June 29, 2026 10:10:50 AM

[EXTERNAL]

Date: June 29, 2026

The Honorable Kamillah Hanks
New York City Council

Re: Opposition to the Commercial Waste Zone Program and Preservation of Customer Choice

Dear Council Member Kamillah Hanks,

I am writing as a business owner and constituent to express my strong opposition to the implementation of the Commercial Waste Zone (CWZ) program as it is currently structured for Staten Island.

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My business has been serviced by Faztec Industries for 4 years, and I am extremely satisfied with their service and wish to retain them as my provider.

Thank you for your time and consideration.

Sincerely,

Business Name: Avocado sushi
Business Owner: Avocado sushi
Address: 4 Willow Ave avocado sushi restaurant


[REDACTED]

[REDACTED]

[REDACTED]

Subject: Fw: [EXTERNAL] Opposition to the Commercial Waste Zone Program - beans and leaves coffee and tea cafe llc.

[REDACTED]

From: Faztec Industries [REDACTED]

Sent: Thursday, July 2, 2026 2:08 PM

To: [REDACTED]

Subject: [EXTERNAL] Opposition to the Commercial Waste Zone Program - beans and leaves coffee and tea cafe llc.

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Date: July 2, 2026

The Honorable Erica Cohen
New York City Council

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Thank you for your time and consideration.

Sincerely,

Business Name: beans and leaves coffee and tea cafe llc.

Business Owner: megan coppola

Address: 409 forest avenue

Phone: [REDACTED]

Email: beansandleavescafe@gmail.com

From: [jim](#)
To: [Carr, David](#)
Cc: joec@faztecind.com
Subject: RE: Proposed Int 911-A
Date: Sunday, June 28, 2026 9:12:50 PM

[EXTERNAL]

GREETINGS

IT HAS COME TO MY ATTENTION THAT THE SHERMAN ACT OF 1890, THE CLAYTON ACT OF 1914 AND THE FTC ACT OF 1914 ARE BEING CHALLENGED IN OUR BOROUGH OF STATEN ISLAND BY AN UNWARRANTED CONSOLIDATION OF PRIVATE CARTING WASTE COLLECTION.

I AM ALSO AWARE THAT YOU, ESTEEMED COUNCIL MEMBER, ARE DEFENDING THESE ACTS PUT FORTH TO PROTECT US FREE AMERICAN CITIZENS AND OUR FAIR RIGHT OF CHOICE.

AS A BUSINESS OWNER OF 40 YEARS UTILIZING PRIVATE CARTING SERVICE AND PARTICULARLY UTILIZING FAZTEC INDUSTRIES FOR THE PAST 10 YEARS, IT WOULD BE A GRAVE LOSS TO LOSE THE PRESENT REALTIONSHIP THAT WE CURRENTLY HAVE. FAZTEC IS CONSISTENTLY ON TIME WITH BOTH MONTHLY PICK UP AND DROP OFFS OF CLEAN CONTAINERS BY PROFESSIONAL COURTEOUS DRIVERS. BUSINESS IS ABOUT RELATIONSHIPS AND TO SEVER SAID RELATIONSHIP IS LIKE CUTTING UP THE FABRIC OF STATEN ISLAND THAT MAKES OUR COMMUNITY THRIVE

FORCING ME TO LOSE THIS RELATIONSHIP WOULD CAUSE STRESS UPON MY BUSINESS. I CAN ONLY IMAGINE THE CHAOS THAT WOULD ENSUE WITH ONLY 3 PROPOSED CARRIERS ON STATEN ISLAND. ONCE AGAIN, STATEN ISLAND RISKS BEING 'SHORT SERVICED'.

PLEASE ADVOCATE FOR AN INCREASED NUMBER OF PROVIDERS IN COMPARISON TO THE PROPOSED FEW. I CAN UNDERSTAND WANTING TO CAP THE INDUSTRY SOMEWHAT BUT OUTRIGHT ATROPHY IS EXTREMELY UNAMERICAN.

THANK YOU FOR YOUR CONSIDERATIONS.

REGARDS,
JAMES F. RAGUSA
BIOTHUNDER CONSULTING LLC
[REDACTED]
STATEN ISLAND N.Y. 10306

RE: Proposed Int. 911-A, Commercial Waste Zone

Dear Council Members

Hi

I have a business located in Staten Island

I'd like to voice my concern regarding the Administrative Code of the City of New York in relation to the number of awardees in the Staten Island Commercial Waste Zone.

This is not about opposing waste reform. It is about ensuring that Staten Island businesses are treated fairly and have access to the same level of competition, customer choice, and service options available elsewhere in New York City.

I already had experience with a few companies that continuously cheated me on services.

As long as there wasn't enough competition they kept raising prices and skipping pickups because they took advantage of that lack of competitors.

For example, one of the companies certified on your existing CWZ list, which used to service me, doubled its price within one year. When I first called them about it, they denied charging me those prices. When I proved it, they offered numerous fabricated reasons for my price increase.

I switched to Faztec Industries which was a godsend; they were extremely honest and charged me the normal, reasonable price.

Since I switched companies, the one that used to service me (Certified on your CWZ list) started threatening me with all kinds of fake stories about Faztec going out of business, advising that if I know what's good for my business, I should quickly switch back.

For the last couple of months they continued to call and visit my store stating that Faztec is not CWZ-approved and I'll be forced to switch back to them. And if I wait till the last minute they'll charge me double what they used to charge me in the past.

All of the above is happening because of the lack of competition, allowing them to manipulate us small business owners who already struggle hard enough to make ends meet with continuously rising bills and inflation.

We already have many rules and regulations for doing business in NYC. PLEASE don't add another headache with trash removal as well.

I'd greatly appreciate the committee's consideration of all the above and your making the right and fair decision to assign Staten Island more than one zone and award more companies per zone to offer their services, thereby keeping prices and service competitive.

Sincerely

Sam Nutovics

Chatach Ventures Corp. dba/ Clothesline Laundromat

[REDACTED]

Staten Island, NY 10308

[REDACTED]

From: [Sam Nutovics](#)
To: joec@faztecind.com
Subject: Fwd: [EXTERNAL] Proposed Int. 911-A, Commercial Waste Zone
Date: Friday, June 26, 2026 5:41:08 PM

[EXTERNAL]

Hi Joe

See below Frank Morano's response.

I wish I had time to go down to the meeting to apply more pressure but I submitted my letter to the link and I sent it to all council members you mentioned.

Hope you'll win the fight; you have my full support.

I love doing business with straightforward and honest people, not with crooks and manipulators like the others—I believe you know who they are...

I look forward to hearing good news from you ASAP. Please keep me posted, and I wish you the best of luck.

Sam Nutovics
Chatach Ventures Corp. dba/ Clothesline Laundromat
[REDACTED]
Staten Island, NY 10308
[REDACTED]

----- Forwarded message -----

From: Morano, Frank <FMorano@council.nyc.gov>
Date: Fri, Jun 26, 2026 at 10:13 AM
Subject: RE: [EXTERNAL] Proposed Int. 911-A, Commercial Waste Zone
To: Sam Nutovics [REDACTED]

Dear Mr. Nutovics,

Thank you for taking the time to write and share your experience. Hearing directly from Staten Island business owners is invaluable as the City continues implementing the Commercial Waste Zone program.

I appreciate you describing the challenges you've encountered, particularly your concerns regarding pricing, customer choice, and the competitive landscape. While I cannot speak to the conduct of any individual company, I understand why experiences like the ones you describe would cause concern about limiting businesses to a small number of service providers.

That is one of the reasons I am a sponsor of **Proposed Int. 911-A**, legislation that would delay

implementation of the Commercial Waste Zone program on Staten Island and require the Department of Sanitation to authorize additional commercial waste carters in our borough. My goal is not to undo the CWZ program, but to ensure it works for Staten Island by preserving meaningful competition, protecting small businesses, and giving business owners more choices.

I appreciate you bringing these concerns to my attention. Your perspective helps inform my advocacy on this issue, and I will continue working with my colleagues, the Department of Sanitation, and members of the business community to pursue a fair and practical outcome for Staten Island.

Thank you again for reaching out, and please don't hesitate to contact my office if we can ever be of assistance.

Sincerely,

Frank Morano
New York City Council Member
51st District

From: Sam Nutovics [REDACTED]
Sent: Thursday, June 25, 2026 10:43 PM
To: Morano Public <Morano@council.nyc.gov>; Morano, Frank <FMorano@council.nyc.gov>
Subject: [EXTERNAL] Proposed Int. 911-A, Commercial Waste Zone

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As long as there wasn't enough competition they kept raising prices and skipping pickups because they took advantage of that lack of competitors.

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All of the above is happening because of the lack of competition, allowing them to manipulate us small business owners who already struggle hard enough to make ends meet with continuously rising bills and inflation.

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I'd greatly appreciate the committee's consideration of all the above and your making the right and fair decision to assign Staten Island more than one zone and award more companies per zone to offer their services, thereby keeping prices and service competitive.

Sincerely

Sam Nutovics

Chatach Ventures Corp. dba/ Clothesline Laundromat

[REDACTED]

Staten Island, NY 10308

[REDACTED]

[REDACTED]

From: [Faztec Industries](#)
To: [District49](#)
Subject: Opposition to the Commercial Waste Zone Program - Chez Bros Corp
Date: Monday, June 29, 2026 1:01:36 PM

[EXTERNAL]

Date: June 29, 2026

The Honorable Kamillah Hanks
New York City Council

Re: Opposition to the Commercial Waste Zone Program and Preservation of Customer Choice

Dear Council Member Kamillah Hanks,

I am writing as a business owner and constituent to express my strong opposition to the implementation of the Commercial Waste Zone (CWZ) program as it is currently structured for Staten Island.

For many years, my business has relied on a waste management provider that has consistently delivered dependable service, competitive pricing, and responsive customer support. Under the proposed CWZ system, I may be forced to abandon a company that has earned my trust and instead choose from a limited number of providers selected by the City.

As a business owner, I believe I should have the right to choose the company that services my business. Competition benefits customers by encouraging better service, fair pricing, accountability, and innovation.

I respectfully urge you to support measures that preserve customer choice and allow additional qualified carting companies to participate in the Staten Island zone.

I respectfully ask that you oppose the implementation of the CWZ program in its current form and support legislation that allows businesses to retain the freedom to select the waste management company that best meets their needs.

My business has been serviced by Faztec Industries for 3 years, and I am extremely satisfied with their service and wish to retain them as my provider.

Thank you for your time and consideration.

Sincerely,

Business Name: Chez Bros Corp
Business Owner: Isidro S?nchez



From: [Faztec Industries](#)
To: [District17](#)
Subject: Opposition to the Commercial Waste Zone Program - Clothesline Laundromat
Date: Friday, June 26, 2026 5:22:01 PM

[EXTERNAL]

Date: June 26, 2026

The Honorable Justin Sanchez
New York City Council

Re: Opposition to the Commercial Waste Zone Program and Preservation of Customer Choice

Dear Council Member Justin Sanchez,

I am writing as a business owner and constituent to express my strong opposition to the implementation of the Commercial Waste Zone (CWZ) program as it is currently structured for Staten Island.

For many years, my business has relied on a waste management provider that has consistently delivered dependable service, competitive pricing, and responsive customer support. Under the proposed CWZ system, I may be forced to abandon a company that has earned my trust and instead choose from a limited number of providers selected by the City.

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I respectfully ask that you oppose the implementation of the CWZ program in its current form and support legislation that allows businesses to retain the freedom to select the waste management company that best meets their needs.

My business has been serviced by Faztec Industries for 3 years, and I am extremely satisfied with their service and wish to retain them as my provider.

Thank you for your time and consideration.

Sincerely,

Business Name: Clothesline Laundromat
Business Owner: Sam Nutovics



From: [Gina Pietri](#)
To: [Carr, David](#); [District49](#); [Morano Public](#)
Subject: Commercial Waste Zone: Staten Island
Date: Monday, June 29, 2026 9:34:37 AM

[EXTERNAL]

Dear Council members,

I am writing to you on behalf of Dependable Auto Body in Staten Island, NY. We have been in business since 1978 and have been a staple in Port Richmond since. Family-owned and operated, we have thrived on supporting our other local businesses such as Faztec. This new program limiting us to only choose from 3 businesses is unfair. We have the right to choose who we do business with and pay. Who is to say these companies wont gauge us or provide terrible customer service? For years we have done business with Faztec and things have always gone smoothly, why do we need to change?

Please consider allowing Staten Island businesses the right to choose who they patronize.

Thank you.

--

Gina Quattrocchi
Office Manager
Dependable Auto Body
110 Rector Street
Staten Island, New York 10310
Ph: [REDACTED]
Fax: 718-273-0791
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Subject: Fw: [EXTERNAL] Opposition to the Commercial Waste Zone Program - DeSimone Agency Insurance

From: Faztec Industries [REDACTED]

Sent: Thursday, July 2, 2026 10:55 AM

To: [REDACTED]

Subject: [EXTERNAL] Opposition to the Commercial Waste Zone Program - DeSimone Agency Insurance

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report suspected phishing emails with the Phish Alert Button or forward them to [REDACTED] as an attachment.

Date: July 2, 2026

The Honorable Erica Cohen

New York City Council

Re: Opposition to the Commercial Waste Zone Program and Preservation of Customer Choice

Dear Council Member Erica Cohen,

I am writing as a business owner and constituent to express my strong opposition to the implementation of the Commercial Waste Zone (CWZ) program as it is currently structured for Staten Island.

For many years, my business has relied on a waste management provider that has consistently delivered dependable service, competitive pricing, and responsive customer support. Under the proposed CWZ system, I may be forced to abandon a company that has earned my trust and instead choose from a limited number of providers selected by the City.

As a business owner, I believe I should have the right to choose the company that services my business. Competition benefits customers by encouraging better service, fair pricing, accountability, and innovation.

I respectfully urge you to support measures that preserve customer choice and allow additional qualified carting companies to participate in the Staten Island zone.

I respectfully ask that you oppose the implementation of the CWZ program in its current form and support legislation that allows businesses to retain the freedom to select the waste management company that best meets their needs.

My business has been serviced by Faztec Industries for 3 years, and I am extremely satisfied with their service and wish to retain them as my provider.

Thank you for your time and consideration.

Sincerely,

Business Name: DeSimone Agency Insurance

Business Owner: Christina Nappi

Address: 7327 Amboy Rd

Phone: [REDACTED]

Email: cdesimone@allstate.com

From: [Faztec Industries](#)
To: [District49](#)
Subject: Opposition to the Commercial Waste Zone Program - ESSCO TRUCK AND EQUIPMENT
Date: Friday, June 26, 2026 4:37:14 PM

[EXTERNAL]

Date: June 26, 2026

The Honorable Kamillah Hanks
New York City Council

Re: Opposition to the Commercial Waste Zone Program and Preservation of Customer Choice

Dear Council Member Kamillah Hanks,

I am writing as a business owner and constituent to express my strong opposition to the implementation of the Commercial Waste Zone (CWZ) program as it is currently structured for Staten Island.

For many years, my business has relied on a waste management provider that has consistently delivered dependable service, competitive pricing, and responsive customer support. Under the proposed CWZ system, I may be forced to abandon a company that has earned my trust and instead choose from a limited number of providers selected by the City.

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I respectfully urge you to support measures that preserve customer choice and allow additional qualified carting companies to participate in the Staten Island zone.

I respectfully ask that you oppose the implementation of the CWZ program in its current form and support legislation that allows businesses to retain the freedom to select the waste management company that best meets their needs.

My business has been serviced by Faztec Industries for 6 years, and I am extremely satisfied with their service and wish to retain them as my provider.

Thank you for your time and consideration.

Sincerely,

Business Name: ESSCO TRUCK AND EQUIPMENT
Business Owner: JOHN DIFAZIO
Address: [REDACTED]
Phone: [REDACTED]
Email: TEDD@ESSCOEQUIPMENT.COM

From: [Faztec Industries](#)
To: [District17](#)
Subject: Opposition to the Commercial Waste Zone Program - G & S Associates of Staten Island, LLC
Date: Friday, June 26, 2026 5:33:57 PM

[EXTERNAL]

Date: June 26, 2026

The Honorable Justin Sanchez
New York City Council

Re: Opposition to the Commercial Waste Zone Program and Preservation of Customer Choice

Dear Council Member Justin Sanchez,

I am writing as a business owner and constituent to express my strong opposition to the implementation of the Commercial Waste Zone (CWZ) program as it is currently structured for Staten Island.

For many years, my business has relied on a waste management provider that has consistently delivered dependable service, competitive pricing, and responsive customer support. Under the proposed CWZ system, I may be forced to abandon a company that has earned my trust and instead choose from a limited number of providers selected by the City.

As a business owner, I believe I should have the right to choose the company that services my business. Competition benefits customers by encouraging better service, fair pricing, accountability, and innovation.

I respectfully urge you to support measures that preserve customer choice and allow additional qualified carting companies to participate in the Staten Island zone.

I respectfully ask that you oppose the implementation of the CWZ program in its current form and support legislation that allows businesses to retain the freedom to select the waste management company that best meets their needs.

My business has been serviced by Faztec Industries for 5 years, and I am extremely satisfied with their service and wish to retain them as my provider.

Thank you for your time and consideration.

Sincerely,

Business Name: G & S Associates of Staten Island, LLC
Business Owner: Mauricio Goldstein
Address: 178 Washington Ave



F

[REDACTED]

[REDACTED]

From: Faztec Industries [REDACTED]

Sent: Monday, June 29, 2026 3:37 PM

To: [REDACTED]

Subject: [EXTERNAL] Opposition to the Commercial Waste Zone Program - Joseph G. Hall & Sons Monument

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Date: June 29, 2026

The Honorable Erica Cohen
New York City Council

Re: Opposition to the Commercial Waste Zone Program and Preservation of Customer Choice

Dear Council Member Erica Cohen,

I am writing as a business owner and constituent to express my strong opposition to the implementation of the Commercial Waste Zone (CWZ) program as it is currently structured for Staten Island.

For many years, my business has relied on a waste management provider that has consistently delivered dependable service, competitive pricing, and responsive customer support. Under the proposed CWZ system, I may be forced to abandon a company that has earned my trust and instead choose from a limited number of providers selected by the City.

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I respectfully urge you to support measures that preserve customer choice and allow additional qualified carting companies to participate in the Staten Island zone.

I respectfully ask that you oppose the implementation of the CWZ program in its current form

and support legislation that allows businesses to retain the freedom to select the waste management company that best meets their needs.

My business has been serviced by Faztec Industries for 3 years, and I am extremely satisfied with their service and wish to retain them as my provider.

Thank you for your time and consideration.

Sincerely,

Business Name: Joseph G. Hall & Sons Monument

Business Owner: Brian Hall

Address: 6228 Amboy Rd Staten Island NY

Phone: [REDACTED]

Email: Brian@hallmonuments.com



Zenith Foods LLC

Zenith Foods LLC
3015 Richmond Terrace
Staten Island, New York 10303
Tel: 718-682-3125
Email: sales@zenithfoodsusa.com

Regarding Proposed Int. 911-A New York City Council – June 30, 2026

Good afternoon Chair, Council Members, and members of the Committee.

My name is **Boris Feldman**, and I am a Staten Island business owner. I appreciate the opportunity to submit testimony in support of **Proposed Int. 911-A**, which would increase the number of authorized commercial waste providers in the Staten Island Commercial Waste Zone and delay the implementation of the current plan.

I want to be very clear: **the current CWZ structure, limiting Staten Island to only three providers for the next decade, will negatively impact local businesses.**

Over the past several months, many of us have already experienced pressure from CWZ awardees and their representatives. Businesses are being told they must sign contracts immediately or risk losing service, facing delays, or paying higher rates. This is not a fair or transparent rollout, and it puts unnecessary stress on business owners who are simply trying to operate responsibly.

Staten Island is projected to experience significant commercial and residential growth in the coming years. Yet under the current plan, we will have **fewer service options than many other parts of New York City**. That makes no sense for a borough that is expanding and investing in its future.

For my business and many others, the concerns are straightforward:

- **Less competition means fewer choices.**
- **Fewer choices often lead to higher costs.**
- **Limited provider options reduce flexibility and responsiveness.**
- **Businesses deserve to choose providers based on performance, price, and service—not because regulations leave them with no alternative.**

Competition is not just a preference; it is a necessity for keeping costs manageable and ensuring reliable service. The current structure does not reflect the needs of Staten Island's business community.

For these reasons, I strongly support Proposed Int. 911-A and urge the Council to adopt it. Expanding the number of authorized providers and delaying implementation will give businesses the time, flexibility, and fair market conditions we need to make informed decisions.

Thank you for your attention and for considering the real world impact this program will have on Staten Island businesses.

Respectfully, **Boris Feldman**

Boris Feldman
06/24/2026
ZENITH FOODS LLC
EIN 82-1550359
Staten Island, NY USA

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

Subject: Fw: [EXTERNAL] Opposition to the Commercial Waste Zone Program - JPI Plumbing & Heating Inc.

From: Faztec Industries [REDACTED]

Sent: Wednesday, July 1, 2026 3:09 PM

To: [REDACTED]

Subject: [EXTERNAL] Opposition to the Commercial Waste Zone Program - JPI Plumbing & Heating Inc.

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Date: July 1, 2026

The Honorable Erica Cohen
New York City Council

Re: Opposition to the Commercial Waste Zone Program and Preservation of Customer Choice

Dear Council Member Erica Cohen,

I am writing as a business owner and constituent to express my strong opposition to the implementation of the Commercial Waste Zone (CWZ) program as it is currently structured for Staten Island.

For many years, my business has relied on a waste management provider that has consistently delivered dependable service, competitive pricing, and responsive customer support. Under the proposed CWZ system, I may be forced to abandon a company that has earned my trust and instead choose from a limited number of providers selected by the City.

As a business owner, I believe I should have the right to choose the company that services my business. Competition benefits customers by encouraging better service, fair pricing, accountability, and innovation.

I respectfully urge you to support measures that preserve customer choice and allow additional qualified carting companies to participate in the Staten Island zone.

I respectfully ask that you oppose the implementation of the CWZ program in its current form and support legislation that allows businesses to retain the freedom to select the waste

management company that best meets their needs.

My business has been serviced by Faztec Industries for 2 years, and I am extremely satisfied with their service and wish to retain them as my provider.

Thank you for your time and consideration.

Sincerely,

Business Name: JPI Plumbing & Heating Inc.

Business Owner: Joseph Pietracatella

Address: 4370A Victory blvd

Phone: [REDACTED]

Email: joe@jpiplumbing.com

From: [Faztec Industries](#)
To: [Morano Public](#)
Subject: Opposition to the Commercial Waste Zone Program - Legacy Africana Market Inc
Date: Friday, June 26, 2026 10:51:59 PM

[EXTERNAL]

Date: June 26, 2026

The Honorable Frank Morano
New York City Council

Re: Opposition to the Commercial Waste Zone Program and Preservation of Customer Choice

Dear Council Member Frank Morano,

I am writing as a business owner and constituent to express my strong opposition to the implementation of the Commercial Waste Zone (CWZ) program as it is currently structured for Staten Island.

For many years, my business has relied on a waste management provider that has consistently delivered dependable service, competitive pricing, and responsive customer support. Under the proposed CWZ system, I may be forced to abandon a company that has earned my trust and instead choose from a limited number of providers selected by the City.

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I respectfully urge you to support measures that preserve customer choice and allow additional qualified carting companies to participate in the Staten Island zone.

I respectfully ask that you oppose the implementation of the CWZ program in its current form and support legislation that allows businesses to retain the freedom to select the waste management company that best meets their needs.

My business has been serviced by Faztec Industries for 4 years, and I am extremely satisfied with their service and wish to retain them as my provider.

Thank you for your time and consideration.

Sincerely,

Business Name: Legacy Africana Market Inc
Business Owner: Adebisi Imafidon
Address: 671 Bay Street
Phone: [REDACTED]
Email: Legacymarketplace@yahoo.com

F

[REDACTED]

From: Faztec Industries [REDACTED]

Sent: Monday, June 29, 2026 9:35 AM

To: [REDACTED]

Subject: [EXTERNAL] Opposition to the Commercial Waste Zone Program - Major League LLC

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Date: June 29, 2026

The Honorable Erica Cohen

New York City Council

Re: Opposition to the Commercial Waste Zone Program and Preservation of Customer Choice

Dear Council Member Erica Cohen,

I am writing as a business owner and constituent to express my strong opposition to the implementation of the Commercial Waste Zone (CWZ) program as it is currently structured for Staten Island.

For many years, my business has relied on a waste management provider that has consistently delivered dependable service, competitive pricing, and responsive customer support. Under the proposed CWZ system, I may be forced to abandon a company that has earned my trust and instead choose from a limited number of providers selected by the City.

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I respectfully urge you to support measures that preserve customer choice and allow additional qualified carting companies to participate in the Staten Island zone.

I respectfully ask that you oppose the implementation of the CWZ program in its current form and support legislation that allows businesses to retain the freedom to select the waste management company that best meets their needs.

My business has been serviced by Faztec Industries for 4 years, and I am extremely satisfied with their service and wish to retain them as my provider.

Thank you for your time and consideration.

Sincerely,

Business Name: Major League LLC

Business Owner: Christine Calabrese

Address: 4906 Arthur kill road

[REDACTED]

July 6, 2026

Dear Committee Chair Sanchez and Committee Members,

I write in strong support of Int 0396-2026. I have been a community composter for fourteen years, and I co-operate a 100% volunteer-run community food scrap drop off and compost processing site. Currently, I work as a compost educator for Big Reuse where, among other things, I teach the Master Composter certificate course.

My experience in community composting and compost education leads me to advocate urgently for Int 0396-2026 for five reasons. Int 0396-2026 will:

- Provide the infrastructure needed to use the citywide curbside organics collection mandated by the Zero Waste Act to produce more of the much needed resource that is compost.
- Save city tax dollars by increasing the municipal production of compost, which will then be available for city-planned green infrastructure projects in compliance with the Unified Stormwater Rule.
- Reduce the city's current reliance on diverting organic waste via anaerobic co-digestion, thus mitigating the environmental justice harms of overburdening some DAC neighborhoods with further waste pollution and of transporting biosolids for landfill capping out of the city.
- Foster a distributed system of micro hubs for the production and distribution of compost, which will lower fossil fuel use and support local economies.
- Create new local green jobs and entrepreneurial opportunities in and adjacent to community composting.

As both a community composter and a compost educator, I have learned the value of compost as a key soil amendment in greening and land stewardship projects, community gardening and urban agriculture. Before I became involved in community composting, I would never have imagined how coveted good compost is by such a wide range of New Yorkers from small backyard growers of all backgrounds to professional and citizen land stewards. The more organic waste processing facilities we have in the City, the fewer food scraps will take the route of anaerobic co-digestion, and thus the more of this precious and so widely and urgently needed soil amendment we will have – all for community and public use at no extra cost.

Community composters understand well the crucially smaller carbon footprint of micro sites for producing and distributing compost. Int 0396-2026 calls for a *cumulative* processing capacity for each borough. With the correct implementation, this opens the door to more small and mid-sized organic waste processing facilities throughout the city. Having multiple such sites would significantly lower the environmental costs of organic waste hauling and compost distribution as well as build stronger local economies. Combining the tight closed loop of smaller-scale composting with the mass-scale diversion of residential organic waste mandated by the Zero Waste act is a goal worth striving for. In fact, a system of local organic waste processing facilities throughout the city will raise the visibility of composting, and thus may make

it easier to increase the capture rate of the current curbside organics collection program more quickly. This too will save city tax dollars.

Finally, and just as important, this bill opens up new green career paths and entrepreneurial avenues. Over the last 30 years, some degree of voluntarism has been fundamental to most NYC community composting projects. As a volunteer coordinator of compost volunteers in my community garden and as a facilitator for the Master Composter certificate course, I constantly see engaged, environmentally conscious New Yorkers frustrated at how hard it is to dedicate time to their passion and ideas for fighting climate change through composting ventures beyond a volunteer capacity. I see people desist out of necessity because there aren't enough channels to sustain themselves in green enterprises. We need more avenues through which concerned New Yorkers can apply their knowledge and talents to the climate change problems facing their communities and still make a living.

For all the reasons stated above, I strongly urge you to vote in favor of this bill and move it forward for a general City Council vote.

Respectfully,

Natalia Sucre

Natalia Sucre

F

[REDACTED]

From: Faztec Industries [REDACTED]

Sent: Saturday, June 27, 2026 12:01 PM

To: [REDACTED]

Subject: [EXTERNAL] Opposition to the Commercial Waste Zone Program - New Dorp Pharmacy Corp.

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Date: June 27, 2026

The Honorable Erica Cohen

New York City Council

Re: Opposition to the Commercial Waste Zone Program and Preservation of Customer Choice

Dear Council Member Erica Cohen,

I am writing as a business owner and constituent to express my strong opposition to the implementation of the Commercial Waste Zone (CWZ) program as it is currently structured for Staten Island.

For many years, my business has relied on a waste management provider that has consistently delivered dependable service, competitive pricing, and responsive customer support. Under the proposed CWZ system, I may be forced to abandon a company that has earned my trust and instead choose from a limited number of providers selected by the City.

As a business owner, I believe I should have the right to choose the company that services my business. Competition benefits customers by encouraging better service, fair pricing, accountability, and innovation.

I respectfully urge you to support measures that preserve customer choice and allow additional qualified carting companies to participate in the Staten Island zone.

I respectfully ask that you oppose the implementation of the CWZ program in its current form and support legislation that allows businesses to retain the freedom to select the waste management company that best meets their needs.

My business has been serviced by Faztec Industries for 3 years, and I am extremely satisfied with their service and wish to retain them as my provider.

Thank you for your time and consideration.

Sincerely,

Business Name: New Dorp Pharmacy Corp.

Business Owner: Russell Zadov

Address: 62 New Dorp Plaza S.

[REDACTED]

From: [Faztec Industries](#)
To: [Carr, David](#)
Subject: Opposition to the Commercial Waste Zone Program - NEW GENERATION LANDSCAPING
Date: Friday, June 26, 2026 2:50:21 PM

[EXTERNAL]

Date: June 26, 2026

The Honorable David Carr
New York City Council

Re: Opposition to the Commercial Waste Zone Program and Preservation of Customer Choice

Dear Council Member David Carr,

I am writing as a business owner and constituent to express my strong opposition to the implementation of the Commercial Waste Zone (CWZ) program as it is currently structured for Staten Island.

For many years, my business has relied on a waste management provider that has consistently delivered dependable service, competitive pricing, and responsive customer support. Under the proposed CWZ system, I may be forced to abandon a company that has earned my trust and instead choose from a limited number of providers selected by the City.

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I respectfully urge you to support measures that preserve customer choice and allow additional qualified carting companies to participate in the Staten Island zone.

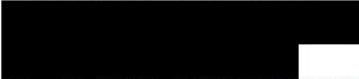
I respectfully ask that you oppose the implementation of the CWZ program in its current form and support legislation that allows businesses to retain the freedom to select the waste management company that best meets their needs.

My business has been serviced by Faztec Industries for 1 years, and I am extremely satisfied with their service and wish to retain them as my provider.

Thank you for your time and consideration.

Sincerely,

Business Name: NEW GENERATION LANDSCAPING
Business Owner: AGUSTIN MENDEZ


Email: NGLANSAPING16@GMAIL.COM

From: [Faztec Industries](#)
To: [District17](#)
Subject: Opposition to the Commercial Waste Zone Program - Page Bagels
Date: Friday, June 26, 2026 7:23:57 PM

[EXTERNAL]

Date: June 26, 2026

The Honorable Justin Sanchez
New York City Council

Re: Opposition to the Commercial Waste Zone Program and Preservation of Customer Choice

Dear Council Member Justin Sanchez,

I am writing as a business owner and constituent to express my strong opposition to the implementation of the Commercial Waste Zone (CWZ) program as it is currently structured for Staten Island.

For many years, my business has relied on a waste management provider that has consistently delivered dependable service, competitive pricing, and responsive customer support. Under the proposed CWZ system, I may be forced to abandon a company that has earned my trust and instead choose from a limited number of providers selected by the City.

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My business has been serviced by Faztec Industries for 3 years, and I am extremely satisfied with their service and wish to retain them as my provider.

Thank you for your time and consideration.

Sincerely,

Business Name: Page Bagels
Business Owner: Mr. Khan
Address: 289 Page Ave


From: [Faztec Industries](#)
To: [Carr, David](#)
Subject: Opposition to the Commercial Waste Zone Program - petsvilla
Date: Wednesday, July 1, 2026 1:53:57 PM

[EXTERNAL]

Date: July 1, 2026

The Honorable David Carr
New York City Council

Re: Opposition to the Commercial Waste Zone Program and Preservation of Customer Choice

Dear Council Member David Carr,

I am writing as a business owner and constituent to express my strong opposition to the implementation of the Commercial Waste Zone (CWZ) program as it is currently structured for Staten Island.

For many years, my business has relied on a waste management provider that has consistently delivered dependable service, competitive pricing, and responsive customer support. Under the proposed CWZ system, I may be forced to abandon a company that has earned my trust and instead choose from a limited number of providers selected by the City.

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I respectfully ask that you oppose the implementation of the CWZ program in its current form and support legislation that allows businesses to retain the freedom to select the waste management company that best meets their needs.

My business has been serviced by Faztec Industries for 2 years, and I am extremely satisfied with their service and wish to retain them as my provider.

Thank you for your time and consideration.

Sincerely,

Business Name: petsvilla
Business Owner: Georgeann Casavilla-Galasso
Address: 56 New Dorp Plaza S
Phone: [REDACTED]
Email: petsvilla@verizon.net

From: [Faztec Industries](#)
To: [District49](#)
Subject: Opposition to the Commercial Waste Zone Program - Piazza's Ice Cream and Frozen Foods
Date: Monday, June 29, 2026 10:49:06 AM

[EXTERNAL]

Date: June 29, 2026

The Honorable Kamillah Hanks
New York City Council

Re: Opposition to the Commercial Waste Zone Program and Preservation of Customer Choice

Dear Council Member Kamillah Hanks,

I am writing as a business owner and constituent to express my strong opposition to the implementation of the Commercial Waste Zone (CWZ) program as it is currently structured for Staten Island.

For many years, my business has relied on a waste management provider that has consistently delivered dependable service, competitive pricing, and responsive customer support. Under the proposed CWZ system, I may be forced to abandon a company that has earned my trust and instead choose from a limited number of providers selected by the City.

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My business has been serviced by Faztec Industries for 3 years, and I am extremely satisfied with their service and wish to retain them as my provider.

Thank you for your time and consideration.

Sincerely,

Business Name: Piazza's Ice Cream and Frozen Foods
Business Owner: Salvatore Piazza
Address: 31 Housman Avenue SINY 10303



[REDACTED]

From: ramone vaughn [REDACTED]
Sent: Sunday, June 28, 2026 2:15 PM
To: [REDACTED]
Subject: [EXTERNAL] Opposition to Proposed Int. 911-A

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Dear Members of the New York City Council,

My name is Ramone Vaughn, and I am writing as a lifelong Staten Island resident, someone with deep family roots in Staten Island's private sanitation industry, and a compliance professional whose career centers on ensuring businesses meet complex regulatory requirements. Because of both my personal background and professional experience, I respectfully urge the Council to reject Proposed Int. 911-A.

Growing up on Staten Island, I saw firsthand the role that locally owned sanitation companies played in our communities. These were not just businesses—they were family-operated companies that employed our neighbors, sponsored local events, and built lasting relationships with customers. My own family has longstanding ties to the private sanitation industry, giving me an appreciation for the hard work and dedication that has helped keep Staten Island clean for generations.

At the same time, I understand the importance of regulatory compliance. My career has focused on helping businesses navigate complex local laws, environmental regulations, and compliance requirements. Effective regulation is essential, but it must be implemented consistently and fairly. Constantly changing the rules after businesses have already invested significant time and resources creates uncertainty and weakens confidence in government. The Commercial Waste Zone program was designed to improve safety, reduce truck traffic, increase environmental sustainability, and modernize New York City's commercial waste collection system. Whether someone supported or opposed the program initially, years of planning, bidding, infrastructure investments, and operational preparation have already occurred. Companies have hired employees, purchased equipment, expanded facilities, and made financial commitments based on the rules established by the City.

Proposed Int. 911-A would significantly alter those rules by increasing the number of authorized providers in Staten Island and delaying implementation. While intended to increase competition, this legislation risks undermining the very stability and predictability that businesses need to operate successfully.

As someone who works in compliance every day, I can say that consistency is one of the most important principles of effective regulation. Businesses are expected to comply with laws, invest in meeting regulatory standards, and plan for the future. Government should be held to that same standard by maintaining stable policies once implementation has begun. Rather than delaying the Commercial Waste Zone rollout or reopening the provider selection process, I encourage the Council to focus on ensuring the existing program operates

efficiently, fairly, and transparently. If improvements are necessary, they should be based on measurable performance data after the system has been fully implemented—not by fundamentally changing the program before it has the opportunity to succeed.

Staten Island has always been unique. Our borough values small businesses, entrepreneurship, and practical solutions. We also value accountability. Businesses have already made decisions based on the City's commitments. Changing course now sends the wrong message to every company that invests in New York City's future.

I respectfully ask the Council to oppose Proposed Int. 911-A and allow the Commercial Waste Zone program to proceed as planned so its effectiveness can be evaluated based on actual performance rather than speculation.

Thank you for your consideration and for your continued service to the residents of New York City.

Respectfully,

Ramone Vaughn

Lifelong Staten Island Resident

Compliance Professional



From: Faztec Industries [REDACTED]

Sent: Monday, June 29, 2026 9:34 AM

To: [REDACTED]

Subject: [EXTERNAL] Opposition to the Commercial Waste Zone Program - Remedi Elite day Spa

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report suspected phishing emails with the Phish Alert Button or forward them to [REDACTED] as an attachment.

Date: June 29, 2026

The Honorable Erica Cohen

New York City Council

Re: Opposition to the Commercial Waste Zone Program and Preservation of Customer Choice

Dear Council Member Erica Cohen,

I am writing as a business owner and constituent to express my strong opposition to the implementation of the Commercial Waste Zone (CWZ) program as it is currently structured for Staten Island.

For many years, my business has relied on a waste management provider that has consistently delivered dependable service, competitive pricing, and responsive customer support. Under the proposed CWZ system, I may be forced to abandon a company that has earned my trust and instead choose from a limited number of providers selected by the City.

As a business owner, I believe I should have the right to choose the company that services my business. Competition benefits customers by encouraging better service, fair pricing, accountability, and innovation.

I respectfully urge you to support measures that preserve customer choice and allow additional qualified carting companies to participate in the Staten Island zone.

I respectfully ask that you oppose the implementation of the CWZ program in its current form and support legislation that allows businesses to retain the freedom to select the waste management company that best meets their needs.

My business has been serviced by Faztec Industries for 4 years, and I am extremely satisfied with their service and wish to retain them as my provider.

Thank you for your time and consideration.

Sincerely,

Business Name: Remedi Elite day Spa

Business Owner: Dawn Calabrese

Address: 4906 Arthur kill road

Phone: [REDACTED]

Email: dawn@remedispa.com

[REDACTED]

[REDACTED]

[REDACTED]

Subject: Fw: [EXTERNAL] Opposition to the Commercial Waste Zone Program - Rossville pizza

From: Faztec Industries [REDACTED]

Sent: Monday, July 6, 2026 4:21 PM

To: [REDACTED]

Subject: [EXTERNAL] Opposition to the Commercial Waste Zone Program - Rossville pizza

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report suspected phishing emails with the Phish Alert Button or forward them to [REDACTED] as an attachment.

Date: July 6, 2026

The Honorable Erica Cohen

New York City Council

Re: Opposition to the Commercial Waste Zone Program and Preservation of Customer Choice

Dear Council Member Erica Cohen,

I am writing as a business owner and constituent to express my strong opposition to the implementation of the Commercial Waste Zone (CWZ) program as it is currently structured for Staten Island.

For many years, my business has relied on a waste management provider that has consistently delivered dependable service, competitive pricing, and responsive customer support. Under the proposed CWZ system, I may be forced to abandon a company that has earned my trust and instead choose from a limited number of providers selected by the City.

As a business owner, I believe I should have the right to choose the company that services my business. Competition benefits customers by encouraging better service, fair pricing, accountability, and innovation.

I respectfully urge you to support measures that preserve customer choice and allow additional qualified carting companies to participate in the Staten Island zone.

I respectfully ask that you oppose the implementation of the CWZ program in its current form and support legislation that allows businesses to retain the freedom to select the waste management company that best meets their needs.

My business has been serviced by Faztec Industries for 5 years, and I am extremely satisfied with their service and wish to retain them as my provider.

Thank you for your time and consideration.

Sincerely,

Business Name: Rossville pizza
Business Owner: Roland krifca
Address: 960 Bloomingdale road



F

[REDACTED]

[REDACTED]

From: Faztec Industries [REDACTED]

Sent: Friday, June 26, 2026 4:54 PM

To: [REDACTED]

Subject: [EXTERNAL] Opposition to the Commercial Waste Zone Program - Select Equipment

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report suspected phishing emails with the Phish Alert Button or forward them to [REDACTED] as an attachment.

Date: June 26, 2026

The Honorable Erica Cohen
New York City Council

Re: Opposition to the Commercial Waste Zone Program and Preservation of Customer Choice

Dear Council Member Erica Cohen,

I am writing as a business owner and constituent to express my strong opposition to the implementation of the Commercial Waste Zone (CWZ) program as it is currently structured for Staten Island.

For many years, my business has relied on a waste management provider that has consistently delivered dependable service, competitive pricing, and responsive customer support. Under the proposed CWZ system, I may be forced to abandon a company that has earned my trust and instead choose from a limited number of providers selected by the City.

As a business owner, I believe I should have the right to choose the company that services my business. Competition benefits customers by encouraging better service, fair pricing, accountability, and innovation.

I respectfully urge you to support measures that preserve customer choice and allow additional qualified carting companies to participate in the Staten Island zone.

I respectfully ask that you oppose the implementation of the CWZ program in its current form and support legislation that allows businesses to retain the freedom to select the waste management company that best meets their needs.

My business has been serviced by Faztec Industries for 3 years, and I am extremely satisfied with their service and wish to retain them as my provider.

Thank you for your time and consideration.

Sincerely,

Business Name: Select Equipment
Business Owner: Zachary Zaborowski
Address: 3729A Victory Blvd
Phone: [REDACTED]
Email: zach@selectequipmentsi.com

F

[REDACTED]

From: Spiral Automotive [REDACTED]
Sent: Tuesday, June 30, 2026 11:28 AM
To: Joe Costanzo [REDACTED] Morano Public <Morano@council.nyc.gov>; Carr, David <DCarr@council.nyc.gov>; District49 <District49@council.nyc.gov>
Cc: [REDACTED]
Subject: [EXTERNAL] CWZ PROGRAM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report suspected phishing emails with the Phish Alert Button or forward them to [REDACTED] as an attachment.

I have been doing business on Staten Island for 28+ years. I have been the owner of this business, PJG Automotive Repair Services Inc., DBA, Spiral Auto Repair, located at 2991 Arthur Kill Road, Staten Island, NY 10309 for 3 and a half years. The business itself has been operating on Staten Island for 47+ years. I purchased the business knowing that NYC & the USA encourages Capitalism and free enterprise.

Having been on Staten Island since 1980, I have interacted with carting companies since 1987. In lieu of that I was around to see the Federal and local authorities take down the monopoly of organized crime in the carting business. With that being said, I believe that the tactics of NYC and it's municipalities, especially the DSNY, are practicing the same tactics that Organized Crime implemented on local business people.

This community should NEVER stand for extortion.

With that, I stand with the belief and action that I will spend my hard earned money as I see fit, as long as I am not breaking any local or Federal rules or laws. This type of extortion should never tolerated in this community or any other communities in this country.

I hope our local politicians will reconsider their stance on handcuffing free enterprise.

Regards,

Philip J. Gambino
President & owner of Spiral Auto Repair

From: [Faztec Industries](#)
To: [Morano Public](#)
Subject: Opposition to the Commercial Waste Zone Program - SPIRAL AUTO REPAIR
Date: Monday, June 29, 2026 11:26:23 AM

[EXTERNAL]

Date: June 29, 2026

The Honorable Frank Morano
New York City Council

Re: Opposition to the Commercial Waste Zone Program and Preservation of Customer Choice

Dear Council Member Frank Morano,

I am writing as a business owner and constituent to express my strong opposition to the implementation of the Commercial Waste Zone (CWZ) program as it is currently structured for Staten Island.

For many years, my business has relied on a waste management provider that has consistently delivered dependable service, competitive pricing, and responsive customer support. Under the proposed CWZ system, I may be forced to abandon a company that has earned my trust and instead choose from a limited number of providers selected by the City.

As a business owner, I believe I should have the right to choose the company that services my business. Competition benefits customers by encouraging better service, fair pricing, accountability, and innovation.

I respectfully urge you to support measures that preserve customer choice and allow additional qualified carting companies to participate in the Staten Island zone.

I respectfully ask that you oppose the implementation of the CWZ program in its current form and support legislation that allows businesses to retain the freedom to select the waste management company that best meets their needs.

My business has been serviced by Faztec Industries for 3 years, and I am extremely satisfied with their service and wish to retain them as my provider.

Thank you for your time and consideration.

Sincerely,

Business Name: SPIRAL AUTO REPAIR
Business Owner: PHILIP GAMBINO
Address: 2991 ARTHUR KILL ROAD
Phone: [REDACTED]
Email: SPIRALAUTOREPAIR2023@AOL.COM

From: [Faztec Industries](#)
To: [Carr, David](#)
Subject: Opposition to the Commercial Waste Zone Program - Sunning Pharmacy Inc.
Date: Monday, June 29, 2026 12:03:21 PM

[EXTERNAL]

Date: June 29, 2026

The Honorable David Carr
New York City Council

Re: Opposition to the Commercial Waste Zone Program and Preservation of Customer Choice

Dear Council Member David Carr,

I am writing as a business owner and constituent to express my strong opposition to the implementation of the Commercial Waste Zone (CWZ) program as it is currently structured for Staten Island.

For many years, my business has relied on a waste management provider that has consistently delivered dependable service, competitive pricing, and responsive customer support. Under the proposed CWZ system, I may be forced to abandon a company that has earned my trust and instead choose from a limited number of providers selected by the City.

As a business owner, I believe I should have the right to choose the company that services my business. Competition benefits customers by encouraging better service, fair pricing, accountability, and innovation.

I respectfully urge you to support measures that preserve customer choice and allow additional qualified carting companies to participate in the Staten Island zone.

I respectfully ask that you oppose the implementation of the CWZ program in its current form and support legislation that allows businesses to retain the freedom to select the waste management company that best meets their needs.

My business has been serviced by Faztec Industries for 5 years, and I am extremely satisfied with their service and wish to retain them as my provider.

Thank you for your time and consideration.

Sincerely,

Business Name: Sunning Pharmacy Inc.
Business Owner: Wei Guo
Address: 2241 Hylan Blvd Staten Island NY 10306
Phone: [REDACTED]
Email: sunningpharm@gmail.com

F

[REDACTED]

[REDACTED]

From: Faztec Industries [REDACTED]

Sent: Tuesday, June 30, 2026 9:52 AM

To: [REDACTED]

Subject: [EXTERNAL] Opposition to the Commercial Waste Zone Program - TDS Woodcrafts Inc

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report suspected phishing emails with the Phish Alert Button or forward them to [REDACTED] as an attachment.

Date: June 30, 2026

The Honorable Erica Cohen
New York City Council

Re: Opposition to the Commercial Waste Zone Program and Preservation of Customer Choice

Dear Council Member Erica Cohen,

I am writing as a business owner and constituent to express my strong opposition to the implementation of the Commercial Waste Zone (CWZ) program as it is currently structured for Staten Island.

For many years, my business has relied on a waste management provider that has consistently delivered dependable service, competitive pricing, and responsive customer support. Under the proposed CWZ system, I may be forced to abandon a company that has earned my trust and instead choose from a limited number of providers selected by the City.

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I respectfully urge you to support measures that preserve customer choice and allow additional qualified carting companies to participate in the Staten Island zone.

I respectfully ask that you oppose the implementation of the CWZ program in its current form and support legislation that allows businesses to retain the freedom to select the waste management company that best meets their needs.

My business has been serviced by Faztec Industries for 3 years, and I am extremely satisfied with their service and wish to retain them as my provider.

Thank you for your time and consideration.

Sincerely,

Business Name: TDS Woodcrafts Inc
Business Owner: TDS Woodcrafts Inc
Address: 104 Port Richmond Avenue, Stat



From: [James Paone](#)
To: [Morano Public](#)
Subject: Support for Proposed Int. 911-A – Preserving Competition and Customer Choice in Staten Island's Commercial Waste Zone
Date: Wednesday, June 24, 2026 1:17:17 PM
Attachments: [Outlook-udxrtncr.png](#)

[EXTERNAL]

Hon. Frank Morano
New York City Council
2955 Veterans Road West, Suite 2eStaten island, NY 10309

Dear Council Member Frank Morano:

I am writing on behalf of the Italian Cultural Foundation at Casa Belvedere, a nonprofit cultural and educational organization serving Staten Island residents through arts, heritage, educational, and community programming.

As the Council considers Proposed Int. 911-A, I respectfully urge your support for legislation that would increase the number of authorized commercial waste providers serving Staten Island and provide additional time for implementation of the Commercial Waste Zone program.

While we appreciate the City's efforts to modernize commercial waste collection and improve environmental outcomes, we are concerned that limiting Staten Island to only a small number of authorized providers may unintentionally reduce competition, restrict customer choice, and increase costs for the businesses and nonprofit organizations that form the backbone of our community.

Nonprofit organizations such as Casa Belvedere operate under strict budgetary constraints. Every dollar spent on operational expenses is a dollar unavailable for educational programs, scholarships, cultural initiatives, historic preservation, and community services. The ability to select service providers based on pricing, responsiveness, reliability, and customer service is therefore critically important.

For more than five years, Casa Belvedere has relied on Faztec Industries for waste collection services. Throughout that relationship, Faztec has consistently provided dependable service and responsive support. Equally important, Faztec has demonstrated a commitment to Staten Island's nonprofit community through sponsorships and charitable support, including serving as a major sponsor of Casa Belvedere's annual Italian Festival and Luxury Car Show for the past two years.

Our support for Proposed Int. 911-A is not based solely on our experience with one

provider. Rather, it reflects a broader concern that limiting customer choice and competition may negatively affect businesses, cultural institutions, nonprofit organizations, schools, houses of worship, and property owners throughout Staten Island. Competition helps ensure fair pricing, accountability, innovation, and high-quality service. Preserving those benefits should remain a priority as the City advances its waste management goals.

Staten Island is projected to experience continued growth in both its residential and commercial sectors over the coming decade. As our borough grows, maintaining flexibility and sufficient provider capacity will become increasingly important. Expanding the number of authorized providers and allowing additional time for implementation would help ensure that businesses and nonprofits are not placed at a disadvantage while the City pursues its long-term objectives.

We respectfully ask that you support Proposed Int. 911-A and work to preserve competition, customer choice, and operational flexibility for Staten Island's business and nonprofit communities.

Thank you for your consideration and for your continued service to the people of New York City.

Respectfully,

James Paone

Vice-President of Operations

The Italian Cultural Foundation at Casa Belvedere

"Preserving the Past, Enriching the Future"

79 Howard Ave

Staten Island, NY 10301

718-273-7660

jpaone@casa-belvedere.org

www.casa-belvedere.org

[REDACTED]

To:

[REDACTED]

[Testimony](#)

Subject:

Fw: [EXTERNAL] Re: Thomas Tirro Testimony Against Commercial Waste Zone

Date:

Wednesday, July 1, 2026 3:23:07 PM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Thomas Tirro [REDACTED]

Sent: Wednesday, 01 July 2026 14:07:25

To: [REDACTED]

Subject: [EXTERNAL] Re: Thomas Tirro Testimony Against Commercial Waste Zone

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report suspected phishing emails with the Phish Alert Button or forward them to [REDACTED] as an attachment.

I, Thomas Tirro, am opposed to the proposed Commercial Waste Zone program. I believe it will negatively impact businesses, customers, and the waste management industry. I support policies that encourage fair competition, preserve customer choice, and protect jobs while maintaining effective and reliable waste collection services.

From: [REDACTED]
To: [Testimony](#)
Subject: Fw: [EXTERNAL] Sal Tirro's Testimony Against Commercial Waste Zone
Date: Wednesday, July 1, 2026 3:24:23 PM

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: Sal Tirro [REDACTED]
Sent: Wednesday, 01 July 2026 14:08:53
To: [REDACTED]
Subject: [EXTERNAL] Sal Tirro's Testimony Against Commercial Waste Zone

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report suspected phishing emails with the Phish Alert Button or forward them to [REDACTED] as an attachment.

Hello,

I, Sal Tirro, am opposed to the proposed Commercial Waste Zone program. I believe it will negatively impact businesses, customers, and the waste management industry. I support policies that encourage fair competition, preserve customer choice, and protect jobs while maintaining effective and reliable waste collection services.

Thank you

--
Sal Tirro
TirCon LLC
3080 Arthur Kill Rd
Staten Island, NY 10309
Phone: [REDACTED]
Fax: 718-317-6186



Memorandum in Opposition Intro 911-A of 2026

June 24, 2026

Dear Council Members,

The Transform Don't Trash NYC Coalition writes in strong opposition to Intro 911-A of 2026, a bill that would undermine the City's landmark Commercial Waste Zones (CWZ) system by doubling the number of private waste haulers contracted to operate in the Staten Island Commercial Waste Zone, and would delay implementation of the program on Staten Island until 2028. This bill would also compromise DSNY's plan to complete citywide implementation by the end of 2027.

The rollout of the citywide CWZ system mandated by Local Law 199 of 2019 is well underway. As of next week, a total of six of the city's 20 commercial zones will be implemented, with a maximum of three designated waste haulers serving businesses in each zone. By the end of the year, businesses in half of the City's zones will have made the transition to the new system.

For the first time, waste companies participating in the CWZ system are contractually obligated to meet numerous safety, environmental, customer service, efficiency, and pricing standards set by the City. This reform of the commercial waste system follows a decade-long campaign to eliminate millions of unnecessary truck miles, divert far more commercial waste from landfills and incinerators, institute safety training and technology, and greatly increase transparency and accountability in a notoriously dangerous and inefficient industry.

By doubling the number of haulers permitted to operate in one of the City's zones, Intro 911-A would diminish route efficiencies, adding polluting truck miles to local streets and highways, and contribute to dangerous driver fatigue and overwork. It would also make

1.
it far more difficult and costly for DSNY and the Business Integrity Commission to enforce the many safety, recycling, pricing, and transparency rules built into the new system. Additionally, Intro 911-A would allow continued air pollution in environmental justice communities with some of the highest rates of asthma including disadvantaged communities in Brooklyn and New Jersey.

Retroactively increasing the number of competitors the Staten Island zone would similarly undermine private sector investments in cleaner trucks, recycling and composting services, and worker safety programs that current contract awardees must undertake to comply with contractual obligations under the CWZ system. Altering the terms of the RFP that these contractors responded to and won would likely trigger litigation against the City.

Finally, this bill would further delay the safety, economic, and environmental benefits of the CWZ system for private sanitation workers, residents, and businesses, and would create unnecessary cost and confusion for the CWZ contractors, customers, and DSNY personnel engaged in planning and outreach for the imminent transition to the new system.

For these reasons, we strongly oppose Intro 911-A of 2026.

Yours,

ALIGN
Natural Resources Defense Council
NYC Environmental Justice Alliance
New York Lawyers for the Public Interest
Staten Island Environmental Justice Coalition
Staten Island Urban Center
Teamsters Local 813
Transportation Alternatives

From: [Faztec Industries](#)
To: [Carr, David](#)
Subject: Opposition to the Commercial Waste Zone Program - Van Alphen Bros., Inc.
Date: Tuesday, June 30, 2026 1:38:00 PM

[EXTERNAL]

Date: June 30, 2026

The Honorable David Carr
New York City Council

Re: Opposition to the Commercial Waste Zone Program and Preservation of Customer Choice

Dear Council Member David Carr,

I am writing as a business owner and constituent to express my strong opposition to the implementation of the Commercial Waste Zone (CWZ) program as it is currently structured for Staten Island.

For many years, my business has relied on a waste management provider that has consistently delivered dependable service, competitive pricing, and responsive customer support. Under the proposed CWZ system, I may be forced to abandon a company that has earned my trust and instead choose from a limited number of providers selected by the City.

As a business owner, I believe I should have the right to choose the company that services my business. Competition benefits customers by encouraging better service, fair pricing, accountability, and innovation.

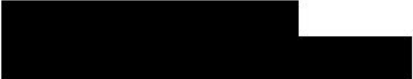
I respectfully urge you to support measures that preserve customer choice and allow additional qualified carting companies to participate in the Staten Island zone.

I respectfully ask that you oppose the implementation of the CWZ program in its current form and support legislation that allows businesses to retain the freedom to select the waste management company that best meets their needs.

My business has been serviced by Faztec Industries for 9 years, and I am extremely satisfied with their service and wish to retain them as my provider.

Thank you for your time and consideration.

Sincerely,

Business Name: Van Alphen Bros., Inc.
Business Owner: Peter Van Alphen
Address: 874 Richmond Rd


**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Gregory Anderson

Address: _____

I represent: DSNY

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Jennifer McDonnell

Address: _____

I represent: DSNY

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Frank Marshall

Address: _____

I represent: DSNY

Address: _____

Please complete this card and return to the Sergeant-at-Arms

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 7/1/26

(PLEASE PRINT)

Name: JUSTIN GREEN

Address: [REDACTED] Brooklyn NY

I represent: BIG REUSE

Address: 1 12th St. Brooklyn NY 11215

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 333,307 Res. No. 711A,369

☒ in favor ☒ in opposition

Date: 7/1/26

(PLEASE PRINT)

Name: Erin Wright

Address: 209 Jerusalem St. Brooklyn

I represent: Brooklyn Borough President Reynoso

Address: 209 Jerusalem St. Brooklyn

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Josh Haraf

Address: [REDACTED]

I represent: Action Carting

Address: Frank W. Burr Blvd Teaneck

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: 7/1/2026

(PLEASE PRINT)

Name: Joyce Bialik

Address: [REDACTED] West 140

I represent: NA

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 369 Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Rhonda Kolsch

Address: [REDACTED] Brooklyn

I represent: Cafe Kulture

Address: Ave D / 8th St Manhattan

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: 367/369

(PLEASE PRINT)

Name: Justin Wood

Address: 151 W 30th 10001

I represent: NYLPI / TOTNYC

Address: 151 W 30th NY NY 10001

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 07/11/2026

(PLEASE PRINT)

Name: Dominic Acordas

Address: [REDACTED] Brooklyn, NY 11249

I represent: Compost Power

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 357 Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Matthew Civallo

Address: [REDACTED]

I represent: Manhattan Solid Waste Recycling Board

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 353 Res. No. 356

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Wendy Frank

Address: [REDACTED]

I represent: Manhattan Solid Waste Advisory Board

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 369 Res. No. _____

☐ in favor ☐ in opposition

Date: 7/1/2026

(PLEASE PRINT)

Name: Mary Ellen Sullivan

Address: [REDACTED] Brooklyn

I represent: Brooklyn Solid Waste Adv Board

Address: 209 Jamaica Brooklyn

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: ERIC A. GOLDSTEIN

Address: _____

I represent: NATURAL RESOURCES DEFENSE COUNCIL

Address: 40 WEST 28 ST NY NY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 369 Res. No. _____

☒ in favor ☐ in opposition

Date: 7-1-2026

(PLEASE PRINT)

Name: Jaimere Rush

Address: [REDACTED]

I represent: cafeteria culture

Address: _____