

**Testimony of
Jessica Tisch, Commissioner
New York City Department of Sanitation**

**Hearing before the New York City Council
Committee on Sanitation & Solid Waste Management and the
New York City Council Committee on Contracts
Wednesday, November 20, 2024, 10:00 A.M.**

Oversight Hearing: Containerization of Refuse and Organic Waste

Good morning Chair Abreu, Chair Won, and members of the Committees on Sanitation and Solid Waste Management and Contracts. I am Jessica Tisch, Commissioner of the New York City Department of Sanitation, and I am joined today by First Deputy Commissioner Javier Lojan, by Joseph Antonelli, Deputy Commissioner, Management and Budget, by Joshua Goodman, Deputy Commissioner, Public Affairs & Customer Experience, and by an official NYC Bin, fresh from its new role changing the look and feel of our City's sidewalks.

Over the last two years, DSNY has led the City of New York through a Trash Revolution. The effort to containerize the 44 million pounds of trash New Yorkers produce each day is decades in the making – almost from the moment that Mayor Lindsay legalized the use of uncontainerized black trash bags more than 50 years ago, there have been people who recognized the need to do better, and as global cities innovated, New York City fell behind.

That is changing, at long last. The days of Trash City are coming to an end.

This effort began in earnest in April 2023 with a change to the time when waste may legally be set at the curb. The old set-out time of 4pm was among the earliest in the world, and it meant that the vast majority of trash sat out for more than half of a given 24-hour period. The change in set-out time also incentivized the use of containers by allowing containerized waste to go out earlier, thus helping New Yorkers to begin kicking the habit of putting trash directly on our sidewalks.

Between September 2023 and March 2024, DSNY phased in trash bin requirements for every single business in the City, and those bins are now fighting rats in commercial corridors in every corner of the City. While we have seen widespread compliance, we are also engaging in meaningful enforcement around this requirement, having issued approximately 60,000 summonses and warnings to businesses failing to use containers to date. Residents can also report this violation directly to 311 and expect a next-day inspection by DSNY.

Last week, the first residential containerization mandate in 50 years took effect, covering buildings with one to nine residential units – everything from single-family homes through the nine-unit brownstone. These buildings are now required to place their trash out for collection in bins of 55 gallons or less with a secure lid, and by June 2026, will be required to use the official NYC Bin. This comes after months of outreach, including substantial work with your offices,

and is being done with a focus on equity. As a result, something amazing is happening: the entire City is talking about trash cans.

The official NYC Bin will allow for the use of standardized mechanical tippers, which are cleaner and safer for Sanitation Workers, half of whose line of duty injuries are sprains and strains from throwing bags. And it is available now at www.bins.nyc for about a third the cost of what similar bins sell for at retail. New Yorkers have ordered nearly 450,000 of these bins so far, and we kept our promise that every single order placed before October 1 would be delivered by the time the mandate went into effect. Those bins are among nearly 300,000 that have made it to homes across the City already, with the rest well on their way.

In addition to lower-density residential buildings, this bin requirement also covers the trash from all houses of worship, City agency buildings, and other non-residential buildings that receive DSNY collection like non-profits, libraries, and hospitals. There will be a warning period for residential properties through January 2, 2025, but let me be clear about what this rule means: 70% of New York City's trash in containers, a remarkable achievement that means fewer rats, reduced odors, and a reclamation of our public space.

And we are certainly not stopping there. Mayor Adams has been clear: the plan is to containerize all trash across the entire City based on learnings from an upcoming pilot. In the Spring of next year, DSNY will begin the installation of Empire Bins, a European-style stationary on-street container for use by larger buildings, starting with Manhattan Community District 9 in West Harlem. Unlike similar on-street trash containerization programs in Europe, South America, and Asia, Empire Bins will not be shared by the entire block, but rather assigned specifically to a larger building, for use only by that building's staff. This will prevent bins from overflowing, and essentially uses New York City's density – one of the supposed stumbling blocks of prior containerization efforts – to our advantage going forward.

The Empire Bins will be required for all buildings in the pilot area with 31 or more units, and buildings with 10 to 30 units will have the choice of either opting in to request the use of Empire Bins, or containerizing via wheelie bins like the City's smaller residential buildings.

When this first district is installed, there will be one entire part of the City with no bags of trash on the street; a perfect district to study and from which to plan expansion.

This sweeping change to waste set-out and collection is only one of several major new initiatives taking place at DSNY.

After decades of attempts, we now have a universal, easy, accessible and citywide curbside composting program, allowing all New Yorkers to set out their food scraps and yard waste every week on their recycling day. The response to this program has been astounding – compostable waste diverted from landfill has risen 65% over the last two years, and enthusiasm is unabated, with Staten Island residents requesting more brown bins this summer and fall than any other borough.

I would like to take the opportunity – as DSNY has done at four previous hearings – to again raise the issue of commercial organics separation. Local Law 146 of 2013 requires certain commercial establishments to separate their compostable material, but this law is now substantially out of step with the City’s commitment to diversion of compostable waste. While the Commercial Waste Zone system will improve commercial diversion, we also urge the Council to consider an update that would allow DSNY to require source separation at all commercial establishments, in line with the progress made in residential diversion.

And speaking of the Commercial Waste Zone system, one of the other substantial overhauls of waste operations in New York City, we are now only just over one month away from full implementation of the first zone, Queens Central. This initiative will end what was functionally a Wild West of commercial carting, after Brooklyn Borough President Antonio Reynoso and others worked for years to develop a thoughtful system for calling in the cavalry – DSNY.

When the first zone is fully implemented right after the new year, DSNY will gain significant new enforcement capabilities, but we are not waiting to make it clear that things have changed. DSNY enforcement personnel have issued 114 summonses to commercial carters in Queens Central since the enforcement period began, for everything from safety violations to offenses against basic cleanliness. This enforcement works; we are seeing drastic increases in compliance even before full DSNY authority takes effect.

We have convened the CWZ Safety Task Force, overseen trainings and engaged in substantial and ongoing outreach to businesses.

As predicted when Local Law 199 of 2019 went into effect, the Commercial Waste Zone program is leading to some industry consolidation. We remain steadfast in our commitment that there must be three carters per zone and that no carter may have more than 15 zones, including via subsidiaries, in order to maintain necessary market competition and keep prices down. In the case of current consolidation already underway that may necessitate a new award, we plan to use the existing RFP documents given their recency and continued relevance. In the future, as time goes on, that may change and new bids may be necessary.

Proposed Legislation

We continue to rely on the partnership of this Council to make these long-overdue changes a reality. With that in mind, I will now turn to the bills on today’s agenda.

The pre-considered introduction sponsored by Council Member Hudson is essential to the success of the Trash Revolution. This bill will allow for a sustainable model for expansion of Empire Bin on-street containers beyond the pilot district. If you are interested in seeing full-scale containerization across the City, it must pass, and we support the concept of this legislation in the strongest possible terms. Our initial use of on-street containers in Hamilton Heights led to a 60% decrease in rat sightings on blocks that had the bins, while the rest of the neighborhood was flat on the same statistic. We know this works, and I want to thank Council Member Hudson and Chair Abreu for their forward thinking in making sure that the M9 pilot has a mechanism for further expansion.

Int-57, sponsored by Council Member Osse, is similarly important to our ongoing efforts. We strongly support the goal of making repeat cleanliness offenders pay for polluting our sidewalks and codifying containerization into law, and I look forward to working with you to advocate for this law.

Int-498, sponsored by Chair Abreu, requires DSNY to collect waste from community gardens. The Department already provides this service to any community garden that requests it, and we are happy to support the Chair's introduction which will codify that policy into law.

The next two bill on the agenda today, Int-698 and Int-781, both sponsored by Council Member Nurse, are a study in contrasts around the diversion of beneficial reuse of compostable material. Int-781 expands composting, requiring source-separation at all City agency buildings. Mayor Adams made a promise that all DOE schools would separate their compost, and earlier this year, that promise was kept. With DOE already participating in this important program, DSNY supports this bill strongly; all residents and some businesses have to separate their compostable material, and City government should as well.

It is frustrating, then, that Council Member Nurse's other bill, Int-698, could actually *restrict* access to composting by taking our extremely popular Smart Bin program and arbitrarily declaring that it does not comply with existing legislation around food scrap drop-offs, in particular Local Law 89 of 2023. This program is beloved, being used over 1.2 million times in FY24. Why, then, would the Council simply say that it doesn't count, even though every single use of these Smart Bins keeps material out of landfill? It will be difficult for DSNY to justify the operating expenses of the Smart Bins if this legislation passes, and I must strongly oppose, so that New Yorkers can continue to compost easily.

The next bill, Int-949, sponsored by Public Advocate Williams, has been reintroduced over a period of several years and calls for containerization of waste at certain large buildings. Containerization is absolutely the right idea, but this bill in its current form is not the right approach; as you all know, we are moving forward with a more fully-developed citywide containerization plan, and I am in touch with the Public Advocate about aligning his bill with our work.

The administration has similar feelings about the pre-considered introduction sponsored by Chair Abreu. The specifics of the Trash Revolution were not designed haphazardly, but rather based on a detailed volumetric analysis and block by block surveys. Last week, we began requiring all City agencies to containerize their trash alongside and in a similar manner to all businesses and all lower-density residential buildings because this analysis showed that this is the phase of the Trash Revolution in which City agency buildings belong. This legislation has a very important goal – to containerize City agency trash – but it requires even small schools and offices to use Empire Bins, which our research shows are not appropriate in most cases. There certainly may be some municipal buildings that can support an Empire Bin, and we would be happy to work with the Chair on a revision that achieves the goal of universal containerization while maximizing use of public space.

The third pre-considered introduction, sponsored by Council Member Salaam, would create a reimbursement program for property owners who purchased the official NYC Bin, seen beside me here at the table, subject to future appropriations. I would like to remind the Council that, thanks to careful strategic planning and contracting by DSNY, this bin is the cheapest of its quality by far – around \$50, when similar bins can be well over \$100.

While each individual bin is inexpensive, the cost of a program like the one described in this bill would be quite high given the overall number of bins purchased. Paying for one bin for each of the properties covered by this requirement would cost approximately \$36 million, and reimbursing all bins purchased to date would cost approximately \$22 million. That is to say nothing of the logistical challenges involved in a reimbursement program – verifying receipts, distributing checks, all of which would come with high staffing and administrative costs. We maintain that the low cost of each individual bin is the responsibility of the property owner, particularly given that it is the property owner who reaps the benefit in quality of life of not having bags of trash outside their home. That said, we welcome the opportunity to work with the Council to explore even more ways to help property owners get these bins, and the Law Department is reviewing the bill.

Finally, we have Int-1108, sponsored by Council Member Menin. This bill thoughtfully identifies a loophole in DSNY enforcement authority. Most cleanliness violations written by the Department are premises-based; that is, written to a specific address. But how do we enforce against cleanliness violations that exist in our public realm, and do not have a specific property address attached? While the Law Department is currently reviewing the bill language, we greatly appreciate Council Member Menin's leadership in introducing it and we look forward to working together on it.

Council Member Nurse has also introduced one resolution on today's agenda, Reso-284, calling for mandatory composting at SUNY and CUNY campuses. This is a good idea that we are happy to support.

Thank you, and we look forward to taking your questions.



JUMAANE D. WILLIAMS

**STATEMENT OF PUBLIC ADVOCATE JUMAANE D. WILLIAMS
TO THE NEW YORK CITY COUNCIL COMMITTEE ON CONTRACTS AND THE
NEW YORK CITY COUNCIL COMMITTEE ON SANITATION AND SOLID WASTE
MANAGEMENT
NOVEMBER 20, 2024**

Good Morning,

My name is Jumaane D. Williams, the Public Advocate for the City of New York. Thank you Chairs Abreu and Won, and committee members for holding this hearing.

Today I am introducing Int. 0949-2024, which requires that someone who manages or controls a building with 100 units or more provide a container for refuse. As of last week, properties with 1-9 residential units must use a secure bin with a lid for trash, recycling or compost¹. However, we know that NYC consists of different sized housing and buildings and we continue to seek to curtail trash around the city as a whole. Any building, commercial or residential, with 100 units or more should have a large or ample sized container for building residents to use. This will assist with rat mitigation and better the visual blight the city has endured that was exacerbated during the pandemic because everyone was working from home during the shut down and generated more trash. Also, since the shutdown, many New Yorkers started working hybrid models generating more trash from home as compared to when everyone worked in the office 5 days a week.

Keeping the streets cleaner supports the city's sustainability goal to reduce gas emissions by 2050, allowing residents to have more access to spaces like sidewalks and bike lanes that will no longer have to face clutter from trash bags. Cleaner streets also assist with our carbon neutrality goals, by encouraging more New Yorkers to convert to containerization and explore pedestrian plazas and other open spaces that would otherwise be blocked by trash buildup. Less trash on the streets creates more sustainable transportation options in biking and other public transit, while helping citizens transition away from emitting gas.

A 2019 report from the Mayors Office of Climate and Environmental Justice, A Livable Climate, shared that over $\frac{1}{3}$ of NYC's residential waste came from landfilling organic waste, which resulted in the release of methane, a greenhouse gas that warms the climate². The City has since begun to implement waste management strategies by mandating separate colored bins|containers with wheels, to help separate waste, compost, which lowers methane and carbon, and other garbage. In addition, the City slowly rolled out the implementation of violations to allow New

¹ <https://www.bins.nyc/>

² <https://climate.cityofnewyork.us/wp-content/uploads/2024/09/A-LIVABLE-CLIMATE.pdf>

Yorkers a period of adjustment. NYC mandating an adjacent street to house a container for any building with 100 units or more is the next logical step for a city that is combating a rat epidemic. A larger onus should be placed on seeking private partners in the field of sanitation and waste management, who are looking to partner with the City to design and market products that are reusable or recyclable. Purchasing trash bins or receptacles should not be seen as an additional cost to New Yorkers, as they will help mitigate unforeseen costs to sidewalks and property, as well as prevent citizens from being consistently fined by the DSNY³.

As containerization begins to take effect, we have a responsibility to ensure that this program runs smoothly for sanitation workers, residents, and those visiting our city. In mandating receptacles to the city's largest buildings, we can start work to establish a system that addresses containerization for buildings less than 100 units that can work for everyone without sacrificing our goals for a greener and more sustainable future.

Thank you.

³ <https://www.amny.com/news/mandatory-garbage-rule-to-begin-in-nyc/>



OFFICE OF THE BROOKLYN BOROUGH PRESIDENT

ANTONIO REYNOSO

Brooklyn Borough President

Committees on Sanitation and Contracts

Oversight Hearing: Containerization of Refuse and Organic Waste

11.20.24

Good morning and thank you Chairs Abreu and Won and members of the committees for holding this hearing today. My name is Lacey Tauber and I'm here representing Brooklyn Borough President Antonio Reynoso, to discuss both DSNY's containerization rollout and ongoing efforts to keep food waste out of our landfills.

Containerization

Borough President Reynoso agrees that containerization is smart and necessary policy, and he has been advocating for it since he was Chair of the Council's Sanitation Committee. However, he has concerns with DSNY's plan as it currently stands; specifically, that it is too broad, was rolled out too quickly, and has the potential for unintended consequences that will impact our streetscapes and quality of life.

In April of last year, DSNY released its *Future of Trash* report, prepared by consultancy McKinsey. The report stated that, "containerization is not a one-size-fits-all solution." It reported that 50% of the city is appropriate for individual bins, specifically lower-density areas such as Staten Island, Eastern Queens, and Southern Brooklyn. The report recommended a block-by-block approach to determining the appropriate method of containerization for the rest of the city, considering elements such as available curb space, anticipated waste output, and street width. Yet DSNY is rolling out its current rules based on building size rather than geography, instead of taking the suggested considerations into account.

To be clear, everyone agrees that the mountains of trash bags on our sidewalks are unacceptable. However, nearly 20% of 1-9 unit buildings have storefronts on the ground floor, according to the Center for Zero Waste Design. They simply have nowhere to store the bins, and the accompanying commercial businesses (which are also required to use bins) often do not, either. This means these bins will become permanent fixtures on our sidewalks, blocking storefronts and ground floor windows while obstructing pedestrian walkways.

Instead, DSNY should take a more nuanced approach to containerization. In low-density areas where bin storage is available, the bins are an appropriate solution. Outside of those areas, DSNY should fast-track the rollout of stationary, on-street, shared containers, which the report called "the only path to high-density residential containerization at scale." It should also allow large

buildings with trash compactors to use wheeled, lidded containers, placed temporarily in the curb lane. These are the right solutions for dense parts of the city for both residential and commercial waste, and DSNY should not shy away from removing free public parking spaces for what we all agree is a public good – making our streets cleaner and getting rid of rats. The Center for Zero Waste Design’s report *On Containerization* provides a roadmap for implementation that DSNY should follow.

The new containerization programs should also include recycling and organics. As the *On Containerization* report notes, “Creating equally convenient waste drop off areas for trash, recycling and organic waste leads to higher diversion rates.” A smart containerization plan would be tied to a save-as-you-throw model based on bin or bag size to help increase our diversion rates and meet our zero waste goals. Additionally, it is wasteful to have homeowners (or the City, should CM Salaam’s proposed legislation pass) buy bins now only to provide access to shared containers later, and rolling out new and different policies in a short time can be confusing. This will disincentivize use of the shared containers if and when they come.

Borough President Reynoso calls upon DSNY to rethink its containerization plans and to take a more fine-tuned approach that prioritizes waste diversion and sustainability in addition to cleanliness.

Specifically regarding Intro 0057: This bill was originally introduced as part of the Rat Action Plan that passed in 2022. In response to other bills in that package, DSNY promulgated new rules regarding set-out times. They have also continued the efforts toward containerization we discussed today. Ultimately, it is important to incentivize New Yorkers to comply with containerization but given the updated regulatory framework and the continued status of the rollout, we should be thoughtful about the right time to increase fines for non-compliance.

Organics

“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.” This is the opening of a report our office is releasing with the Brooklyn and Manhattan Solid Waste Advisory Boards making the case for implementation of Intro 696, which the Committee has already heard. This bill would go a long way toward supporting organics diversion and would ensure that we are prioritizing traditional composting methods instead of expanding anaerobic co-digestion, which increases production of toxic byproducts. Borough President Reynoso encourages the Council to pass Intro 696, which now has 24 sponsors.

Because of its environmental impact, Borough President Reynoso generally supports all efforts to keep organics out of landfill, including Intros 498 and 781, and Resolution 284. Intro 698 is particularly important to BP Reynoso as an original sponsor of the CORE Act, which he first introduced along with Council Member Powers in 2020. Intro 698 seeks to clarify a provision in what became Local Law 89 of 2023, requiring DSNY to establish and operate at least 30 organic waste drop-off sites citywide, with no fewer than three sites in each borough. To be clear, this bill

never intended to allow smart bins to substitute for community-scale drop-off facilities, which can also serve as sites for education and engagement around composting. Intro 698 is an important bill to close a loophole that DSNY has used to avoid complying with the law as intended.

Thank you again for holding this hearing today. Borough President Reynoso thanks the Council for your attention to this issue and looks forward to working with you to get containerization onto the right track.

REBNY Testimony | November 20, 2024

The Real Estate Board of New York to The City Council Committee on Sanitation and Solid Waste Management on Waste Receptacle Legislation

The Real Estate Board of New York (REBNY) is the City's leading real estate trade association. Founded in 1896, REBNY represents commercial, residential, and institutional property owners, builders, managers, investors, brokers, salespeople and other organizations and individuals active in New York City real estate. We appreciate the opportunity to testify on legislation concerning the expansion of waste containerization requirements.

Bill: 0949-2024

Subject: This bill would require anyone who manages a building with 100 dwelling units or more to provide a dumpster that is at least 20 yards long.

Sponsors: Public Advocate Jumaane Williams and Council Members Nurse, Louis, Restler, Hanif, Hudson, Brewer, Won and Gutiérrez

REBNY supports the City's ongoing efforts to store and place on the curb waste that is containerized, including with a sealed lid. However, many, if not most, large residential buildings will lack space for the container that this bill would require. In addition, if a building were able to accommodate such a container in the interior of the building, it is not clear how these containers would be serviced by the Department of Sanitation. For these reasons, the approach proposed by the bill is not feasible.

Bill: T2024-2744

Subject:

This proposed legislation would require the Department of Sanitation (DSNY) to establish a citywide system whereby residential buildings with 31 units or more would place waste in stationary, on-street containers with sealed lids. Building with 9 to 30 units could opt into this system. DSNY would service the containers with trucks with hydraulic arms.

Sponsors: Council Member Hudson

REBNY supports the City's efforts to remove plastic garbage bags from the sidewalks and commends the Department of Sanitation (DSNY) for its effective rollout of programs to require smaller residential buildings and commercial establishments to containerize their waste. Larger residential buildings, which currently place their waste on the curb in plastic bags for collection by the Department, present a unique challenge. Given the vast number of buildings and the uniqueness of each building – both in terms of the volume of waste produced, the ability to store that waste in a container inside the building before it is collected, and the staffing of the building – containerization mandates for larger buildings can be complex to implement.

For this reason, we generally support efforts to establish on-street waste containers as the method of servicing residential waste from larger buildings in place of trash bags on the curb. The potential benefits of on-street containers and new hydraulic trucks will promote healthier and cleaner sidewalks, fight rats, and protect worker safety.

The key to seeing those potential benefits will depend on a very deliberate and careful approach to implementation so that trash does not pile up on streets on a daily basis. While we generally support the proposal, we believe elements of the bill can be improved in order to ensure the benefits are realized.

First, the legislation would allow DSNY to charge a per unit fee of not more than \$55 to pay for the containerization program. It is not clear to us why the City of New York – with a \$112 billion annual budget – needs to charge an additional fee to residential owners in order to collect trash. The City should be able to pay for improved collection services through its existing municipal budget. If more funds are needed, DSNY must be much more transparent with the public about how those funds will be used and minimize the impact of any cost increase on owners and tenants.

In addition, the proposed legislation requires DSNY to make any fee "wholly or partially discounted" for Mitchell-Lama developments but appears to authorize DSNY to charge fees to all other buildings with residential units. If a fee is going to be authorized, we believe that there is no basis to exempt only Mitchell-Lama developments from the proposed fee. Either all buildings should pay the per unit fee or additional types of units/buildings should be

eligible for a complete or partial discount. We believe the same type of exemption/reduction should apply to buildings with 100% affordable, supportive, or senior housing. In addition, we believe an exemption/reduction should apply to any rent-regulated or income-restricted unit not otherwise captured in the proposed building-level exemptions.

Finally, the bill only addresses waste collection, and it is quiet on recycling and organics that are also collected by DSNY. Going forward, it will be important to clarify how these services will be provided alongside on-street waste containers as without some clarification, this issue will lead to confusion.

Bill: T2024-2775

Subject:

This bill would require DSNY to distribute free official bins to buildings with up to 9 dwelling units. It would also require DSNY to set up a one-year program to reimburse those who purchased bins prior to this bill taking effect.

Sponsor: Council Member Salaam, the Public Advocate (Mr. Williams), and Council Members Hudson, Borelli, Brannan, Williams, Abreu and Louis

Under DSNY's current approach, residents in buildings with up to 9 units would have to buy the significantly discounted bins for around \$50. This bill shifts the cost burden to the City. As stated before, REBNY strongly supports containerizing waste. In addition, we believe that essential services like trash collection should remain free to the public. Therefore, we support the City providing free waste bins to those living in buildings with 9 or fewer dwelling units.

Thank you once again for this opportunity to comment on the proposed legislation.

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November 20, 2024

Testimony of WE ACT for Environmental Justice

To the New York City Council Committee on Sanitation and Solid Waste Management

Regarding Containerization of Refuse and Organic Waste.

Dear Committee Chair Shaun Abreu and Committee on Sanitation and Solid Waste Management:

WE ACT for Environmental Justice is a community-based organization in Harlem, New York City. We recognize and advocate for community-driven solutions that can remedy the institutionalized harms associated with unjust urban planning policies that have plagued communities of color for generations. WE ACT is also a member of the Save Our Compost NYC Coalition – a coalition of New York City organizations working to support legislation that protects, strengthens, and expands community composting across the city while uplifting environmental and climate justice.

Although WE ACT supports containerization, I want to remind DSNY and the council that our goal needs to be waste diversion and refuse reduction not just aesthetic and cleanliness. 41% of NYC's refuse consists of organics (this is just the trash stream, excluding recycling and organics separated). On average, this amounts to 1.1 million tons of organics being sent to landfills and incinerators annually. These landfills and incinerators are sited in or near low-income communities and communities of color outside of NYC and with that comes a host of environmental health and climate issues. As we scale up containerization across the city we must do it thoughtfully; prioritizing and incentivizing waste separation. Currently, we are concerned that the city is going down a path where New Yorkers are not going to separate waste and just toss everything in one bin which is counterintuitive to the city's zero waste goals.

We recognize the complexity of running and maintaining a waste system of this size; however, we feel that any one size fits all approach will not work and that different communities within the city require different, sometimes unique solutions due to the lack of physical



infrastructure for waste. Containerization is just a piece of a much larger waste system and the City should take the opportunity to build a system and infrastructure that is grounded in environmental and climate justice.

I will quickly close my testimony by voicing WE ACT's support for Int 0498-2024 and Int 0698-2024. Int 0498 requires the department of sanitation to collect organic waste from community gardens. This bill allows community gardens to increase their collection capacity and not turn away material that could potentially end up in the trash. Although not addressed in the bill, there is concern that organic waste collected by DSNY will not be turned into compost for soil amendments but instead sent to co-digestion facilities.

Int 0698-2024 clarifies that organic waste drop off sites, for the purposes of complying with Local Law 89, cannot be considered to simply be a standalone, orange Smart Composting Bin. WE ACT advocated for Local Law 89 and the initial intent of that law was to expand community based composting infrastructure which has far more benefits compared to smart composting bins alone. By clarifying what an organic waste drop off is – this eliminates any misinterpretation of the law.

Sincerely,

Lonnie J. Portis

New York City Policy & Advocacy Manager

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Council of New York Cooperatives & Condominiums

TESTIMONY TO THE NEW YORK CITY COUNCIL COMMITTEE ON SANITATION AND SOLID WASTE MANAGEMENT

In Opposition to T2024-2744 and Intro 0949-2024

November 20th, 2024

Thank you, Chair Abreu and members of the New York City Council, for holding this important hearing about waste containerization. We appreciate the opportunity to submit testimony on the proposed amendments to Section 16-114 and Section 16-120 of the administrative code before the committee today.

The Council of New York Cooperatives & Condominiums (CNYC Inc.) is a membership organization providing information, education, and advocacy for housing cooperatives and condominiums throughout New York City's five boroughs and beyond. More than 170,000 New York families make their homes in CNYC member buildings, which span the entire economic spectrum from very modest, income-restricted housing to solid middle-class apartment complexes to upscale dwellings. The shareholders and unit owners in New York's housing cooperatives and condominiums are committed to this City and, as homeowners, have invested heavily in its future.

While we applaud the City Council's determination to improve the quality of life of New Yorkers through containerization, many of our member buildings will be significantly negatively impacted by T2024-2744 and Intro 949-2024 before the City Council today. CNYC's member buildings which are nine units and less have already been negatively affected by the rules developed and implemented by the Department of Sanitation, and the majority of their issues will not be addressed by T2024-2775.

The Department of Sanitation has not adequately accounted for the difficulty of storing and transporting the individual trash bins now required in buildings 9-units and under. As stated in our previous testimony on the rule, many small cooperatives and condominiums do not have room in their common areas to store the now-required bins. Several buildings have received confirmation from the fire department that the bins are blocking fire exits, and the Department of Sanitation has yet to provide an adequate method of obtaining waivers. Other buildings have had to retrofit their permanent exterior garbage areas, at significant cost, to accommodate the new bins. Almost all buildings are concerned that their bins will be stolen between the time they are set out on the curb and the time shareholders/unit owners arrive home from work and can return them to the building or outside the garbage area.

Given the above, we request that both T2024-2775 and T2024-2744 be amended to require outreach and the formation of working groups that include co-op and condo stakeholders, who can provide crucial feedback regarding the difficulties and opportunities of the proposed containerization designs. Many neighborhoods in New York City with medium and large-sized cooperatives and condominiums will face granular issues with the location, installation, and use of the proposed structures, undoubtedly creating staffing, parking, and quality-of-life issues for homeowners in these buildings.

Secondly, we ask you to reject the apparent inequity that exists between T2024-2775 and T2024-2744. Cooperative shareholders and condominium unit owners are homeowners. Like single-family and two-family homeowners, they pay real estate taxes and all other costs associated with homeownership. The cooperatives and condominiums are not-for-profit organizations funded and governed entirely by their homeowner residents. We respectfully request that co-op and condo homeowners be accorded the same rights and privileges as all other homeowners. It is not appropriate to charge one set of homeowners up to \$55 per unit annually for trash storage and collection and another set of homeowners nothing. Please ensure equal treatment is given to all homeowners under the City's administrative code. The cost of installing and maintaining any trash containers the Department of Sanitation chooses should come from the City's general fund, not out of the pockets of one specific set of homeowners.

Lastly, we are opposed to Intro 949-2024, which would require buildings in excess of 100 units to purchase and place garbage dumpsters of up to 20-yards long in front of their buildings, for the additional collection of refuse. It is uncertain where these dumpsters could be placed,

given the proposed containerization program, bike lanes, bus stops, parking structure entrances, street parking needs, and space required for FISP and other projects. It is also unclear how buildings could monitor the refuse deposited to ensure recycling and organics regulations are being followed. As dumpsters reduce visibility, permanent dumpsters would also provide a safety concern for pedestrians at night.

Thank you for the opportunity to express our concerns.

Rebecca Poole
Director of Membership and Communication



**TESTIMONY BEFORE NYC COUNCIL
COMMITTEES ON SANITATION & CONTRACTS
Oversight Hearing
November 20, 2024**

Chairs Abreu, Won and Members of the Committees on Sanitation and Contracts,

My name is Laura Rothrock and I'm testifying today on behalf of the NYC BID Association, where I serve as the volunteer co-chair of our Sanitation Working Group. I am also the Executive Director of the Long Island City Partnership. As a reminder, the BID Association represents all of the city's 76 BIDs, many of whom will also testify today.

We are grateful that you are holding this hearing on an issue near and dear to our BID hearts and operations – waste containerization. For over 40 years, BIDs have been trusted partners to NYC, providing services including supplemental sanitation to districts that had been inadequately served by the city due to scarce resources. This includes the bagging and re-lining of overflowing corner basket trash cans which could not be emptied at a fast-enough rate by DSNY. As per the FY23 SBS trends report, BIDs collect or replace over 10,000 trash bags every day. While some larger BIDs are able to haul those bags to sanitation warehouses, most medium-sized and smaller BIDs simply set those bags on the sidewalk for DSNY pick up. Other BIDs have opted into the clean curb pilot program to reduce the number of bags at key corners but expanding containerizing to accommodate all of the public trash that BIDs bag would be far too costly for many BIDs.

However, DSNY has now issued a mandate saying BIDs must somehow either haul away or containerize the bags, rather than staging them at corners until DSNY pick up and, if BIDs fail to do so, they will be fined for the "improper disposal" of garbage. While we completely understand the desire to "get bags off the street" this is a huge operational and financial burden for BIDs. While BIDs are ready partners in getting trash off the streets, these changes to our operations would be financially impossible for many BIDs. There's also the complexity of siting containers with DOT and local stakeholders. We are grateful that, thanks to the advocacy of the City Council and City Hall, this mandate has been postponed, but we remain deeply concerned that it is still on the horizon with no clear plan for implementation. We submitted a list of operational questions about the mandate to City Hall and DSNY on September 20th, but have not yet received a response.

As you know, BIDs are established through a legislative process and are largely funded by assessments on the properties within our districts. We use these assessment dollars to provide our services, including supplemental sanitation. The services we provide are based on our districts plans administered through a contract with Department of Small Business Services. An operational increase of this magnitude would be far beyond our budgeted expenditures for this fiscal year, which have already been approved by our boards of directors (boards which include

representatives from the Mayor, City Council, Borough President and City Comptroller) For most BIDs, it would likely take multiple years to ramp up to the full “no bags” goal. This new unfunded mandate could also, for some districts, necessitate raising their assessment ceiling, a legislative process that can take two years to realize.

There is a real possibility that especially medium and smaller BIDs, if faced with the potential for fines from DSNY for their normal operations, would have no choice but to cease supplemental sanitation services altogether. In that case, the city would not have bags on the street – it would have overflowing trash cans along the nearly 300 miles of key corridors across the city. This is not what BIDs want, and we suspect it is not what DSNY or the Mayor wants. We remain committed to partnership with DSNY and the City of New York, but will continue to push for clarity, flexibility, and support in order to meet this unfunded mandate.

Joint Statement on DSNY's Proposed Waste Containerization Rule: Implications for Bay Ridge's Commercial Corridors

October 17, 2024

The New York City Department of Sanitation's newly proposed rule requiring residential waste to be stored in large bins presents serious challenges for property owners and businesses in Bay Ridge's key commercial corridors, including 3rd Avenue, 5th Avenue, and 86th Street. While containerization aims to reduce unsightly trash piles and address rodent issues, the unintended consequences for our commercial districts could be detrimental, threatening the vitality of these thriving economic hubs.

Bay Ridge's commercial areas are densely built, with limited space for storing large waste containers. Unlike quieter residential streets, properties in these busy districts lack frontage, rear yard, or hallway space necessary to accommodate 35-55 gallon bins. As a result, property owners and businesses would be forced to place waste bins on narrow sidewalks, creating significant congestion. This would reduce the already limited pedestrian space, obstructing foot traffic and making storefronts less accessible. In areas like ours, where small businesses rely heavily on walk-in customers, particularly along 3rd Avenue and 5th Avenue, decreased accessibility could lead to a drop in foot traffic, directly impacting local businesses that are essential to the community's character and economy.

Furthermore, bins could block essential accessibility features, such as ramps and entryways for individuals with disabilities, putting Bay Ridge at risk of violating ADA compliance. This would not only harm residents and customers but also potentially expose businesses and property owners to legal challenges.

The rule also raises serious safety concerns. FDNY fire codes mandate that sidewalks and egress paths remain clear for emergencies. The lack of storage space for bins in these tightly packed commercial areas could result in blocked fire exits, obstructed emergency access points, and reduced visibility for first responders. In the event of a fire or other emergency, these barriers could jeopardize public safety.

We urge DSNY and city officials to reconsider the blanket application of this rule to commercial corridors like 3rd Avenue, 5th Avenue, and 86th Street in Bay Ridge, Brooklyn. A one-size-fits-all solution is not feasible for New York City's diverse streetscapes, especially in areas where space is already at a premium. Instead, we advocate for tailored solutions, such as exemptions or alternative compliance measures for commercial districts, to balance waste reduction goals with the practical realities of our community. By collaborating with local stakeholders, we can find a solution that enhances cleanliness without harming businesses, public safety, or the vibrancy of Bay Ridge's key commercial streets.



Steve Petros
President
86 Street Bay Ridge Business Improvement District

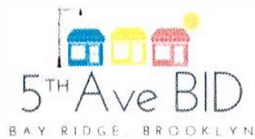


Essa Masoud
President
Bay Ridge 5th Avenue Business Improvement District



Dan Teixeira
President
Merchants of Third Avenue Civic Improvement Association

86 ST BAY RIDGE
BUSINESS IMPROVEMENT DISTRICT



cc: Councilmember Brannan, City Council District 47
Councilmember Feliz, Chair, Committee on Small Business
Councilmember Abreu, Chair, Committee on Sanitation & Solid Waste Management
James MiGlino, DSNY Chief Operations Bureau
Josephine Beckmann, District Manager, Brooklyn Community Board 10
Elizabeth Lovejoy, Executive Director, Bay Ridge 5th Ave BID
Patrick Condren, Consultant for Executive Director Services, 86 Street Bay Ridge BID



NYC Council Committees on Sanitation and Contracts

November 20, 2024

Good morning Chairs Abreu and Won and Members of the Committees on Sanitation and Contracts, I'm Jim Martin, Executive Director of Association of Community Employment Programs for the Homeless, also known as ACE. We are a citywide nonprofit that supports New Yorkers who have histories of homelessness, incarceration, and addiction by providing job training, work experience, and a lifetime support network that helps participants achieve their goals and establish economic independence. In addition to our workforce development programs, we are widely known in the Council for our work providing supplemental sanitation services to many Council districts across the City, working with over 40 Council Members citywide.

We are deeply grateful for the City Council's continued support of ACE's supplemental sanitation services through the Clean Up Initiative. As you know, this funding not only helps to keep the City clean but also offers life-changing employment opportunities for our workforce development program participants. However, we have significant concerns about the planned rollout of containerization, including the DSNY directive that ACE is prohibited from leaving tied-up trash bags adjacent to public garbage receptacles between DSNY pickups. Instead, DSNY will require us and our local BID partners to either identify alternative off-street collection locations or to transport the bagged trash to DSNY facilities ourselves. This will be both operationally and economically infeasible for us, and attempting to comply with this requirement will significantly impact our ability to deliver direct services.

For context, last year ACE filled and removed approximately 900,000 bags of garbage from litter receptacles in Council Districts across the City. Asking our workers to transport or truck these bags multiple blocks or even across a borough is simply impossible. Even if more local storage solutions are identified, by complying with this requirement ACE crews will spend significantly more time moving trash to designated drop off points, and less time providing the types of services New Yorkers have come to rely on, including street sweeping, graffiti removal, senior snow removal and sidewalk power washing, in turn negatively impacting the quality of life for hundreds of thousands of New Yorkers.

Should the implementation of this policy result in ACE being unable to meet the terms of the Cleanup initiative funding we receive, we would have no other choice but to terminate the employment of over 150 full time employees, each a graduate of our workforce development program. These men and women have worked hard in ACE's programs to overcome barriers to employment including homelessness, previous legal involvement, and substance use. For many this is their first job. They are very proud of the work they do, faithfully serving our City every day, keeping our sidewalks free of litter, our buildings, overpasses, and play grounds free of graffiti, and power washing dirty sidewalks in front of our public schools. I encourage you to please keep these folks in mind when determining the future of containerization in New York City.

Thank you again for holding this important hearing today. We are deeply appreciative of the opportunity to partner with you and proud to support the City's sanitation needs through our workforce development program. Our team is available if members of the Council have any questions.



**TESTIMONY OF SAMANTHA MACBRIDE ON INTROS 498, 698, and 781
RELATED TO NYC ORGANIC WASTE POLICY**

Chair Abreu, Chair Won, and members of the Committees on Contracts and on Sanitation and Solid Waste Management:

My name is Samantha MacBride, and I am on the faculty of Baruch College's Marxe School of Public and International Affairs. I teach urban environmental policy, public management, and program evaluation. Recently, I held a two-day conference on new directions in NYC Organic Waste Management policy, which was well-received among advocacy, small business, academic, and local composter communities.

Statements on Organics Intros

Intro 498

I support Intro 498 with caveats. Community gardens must be credited for the organics they collect, with DSNY maintaining and publicly reporting separate tonnage records of these contributions. DSNY must also ensure that clean materials from gardens are composted locally, not sent to codigestion with sewage solids, and provide services without restricting gardens' operations, land tenure, or free speech.

Intro 698

I strongly support Intro 698, as SMART bins, while effective, cannot replace the educational and community benefits of drop-off sites. The City's SMART bin program, initiated under the prior administration, appears successful based on unlock and placement data. However, its contribution remains unclear because tonnages are aggregated with school organics. In FY24, schools and SMART bins together collected about 25,000 tons of organics, but DSNY does not distinguish between the two. SMART bins collect cleaner, residential-sector material, and DSNY should estimate these contributions using weight-to-volume ratios and route data.

Intro 781

I support the inclusion of ASTM-certified compostable bags and food service items in the definition of "organic waste," with caveats.

First, the positives: ASTM-certified compostable plastic materials are highly useful in situations where separating plastics from food waste is challenging, such as in cafeterias or other congregate settings. Compostable bags and liners reduce the "yuck factor" by protecting people from direct contact with rotting food, a known deterrent to participation. NYC should pursue policies encouraging compostable rather than conventional plastic liners, which fragment into microplastics in NYC compost. Milan, Italy—a dense city of over one million residents—offers a model for integrating compostable bags into an efficient, effective organics policy.

However, there are negatives and unknowns: While ASTM certification minimizes known environmental and health risks, compostable plastics are not inert like glass. Ongoing research is exploring the health effects of consuming food and beverages from both conventional and compostable plastics. Additionally, misdirected compostable plastics can contaminate rigid plastic recycling streams, while their similarity to non-compostable plastics can lead to contamination of organics streams.

In my view, ASTM-certified compostable plastics are useful in limited applications, particularly for food waste collection. However, they should not be seen as substitutes for one-way disposable plastics, and sustainable systems should not rely long-term on either compostable or conventional plastics for circularity.

In line with these concerns, Earth Matter, where I serve on the Advisory Board, is interested in plastics reduction. Earth Matter operates a highly successful local aerobic composting program. Along with them, I'm working with students to map out a research-informed vision for a circular, sustainable system featuring reusable serveware Island-wide. I invite the Committee to visit and learn about these efforts.

Conclusion

I urge the Council to prioritize (1) transparency and accountability in DSNY's waste data and reporting and (2) support for local aerobic composting as the primary method of organics management. Codigestion and export should play a limited role, reserved for contaminated streams like school organics.

Achieving sustainability, resilience, and fairness requires building, rebuilding, and strengthening City Agencies' relationships with community organizations and residents. Transparency, public engagement, and performance assessment are critical to improving low curbside organics capture rates. Low rates are seen not only in the newly launched programs in Staten Island, Queens, and the Bronx, but also in longer-standing ones in Brooklyn and Queens. I have documented this performance using DSNY's Open Data historically and up to the present, which I will append to this testimony.

Sincerely,



Samantha MacBride, PhD
Samantha.macbride@ Baruch.cuny.edu

New York City Residential Curbside Organics Program: FY2024 Quarterly Capture Rate Report

Summary:

- In FY2024, Brooklyn had a **3.6%** capture rate for residential compostable organics, while Queens achieved **4.3%**. This equates to an average of 1.8 pounds per household per month in Brooklyn and 2.7 pounds per household per month in Queens set out for DSNY compost collection, out of a potential of around 50 pounds that could have been set out. Participation varied across households, with some contributing more and others less, or not at all. In any city with an organics collection program, these rates would be considered low.

What Does the Capture Rate Measure?

For residential curbside organics, the capture rate addresses the question: "Of all the food scraps, yard trimmings, and compostable paper and packaging that residents could potentially set out for separate collection by DSNY if full participation were achieved, how much was actually set out?"

Compostable organics disposed with trash

This report will discuss pounds and tonnages of compostable organics mixed with regular, black-bagged trash and collected by DSNY during its twice- or three times-weekly refuse collections. These materials were sent to landfills and waste-to-energy (WTE) facilities along with other residential trash.

This does not imply that DSNY collects properly separated organics and then disposes of them. Rather, when residents do not participate in the curbside organics program, they discard compostables with their regular trash, which is collected and treated as refuse.

- Brooklyn's residential curbside organics program collected over 9,500 tons (19 million pounds) of food scraps, yard trimmings, and compostable paper in FY2024, which were picked up by DSNY on weekly organics routes and processed through composting or anaerobic digestion within NYC. However, during the same period, residential buildings in Brooklyn disposed of an estimated 285,000 tons (571 million pounds) of compostables in the trash, rather than separating them correctly. These materials were collected as refuse and sent to landfills or waste-to-energy (WTE) facilities outside NYC.
- Similarly, in Queens, the curbside organics program collected over 14,000 tons (28 million pounds) of compostable material, leaving an estimated 310,000 tons (620 million pounds) of compostables collected as trash.
- The disparity between compostable organics collected for composting or anaerobic digestion, and quantities thrown out with trash, stems entirely from low participation rates among residents, property owners, and building managers. Low participation in turn reflects the effectiveness of DSNY's outreach and education efforts.

- Additional curbside organics collections in Bronx District 8, Manhattan District 7 and Manhattan District 8 brought in another 1,360 tons (over 2.7 million pounds). Capture rates for these districts were 4.1%, 0.8%, and 3.6% respectively.
- Expanding the curbside organics program to Manhattan, the Bronx, and Staten Island, as planned for October 2024, is unlikely to significantly improve participation, although it may modestly increase the amount of organics diverted from landfills.
- School organics programs are not expected to resolve the issue. In FY2024, combined collections from schools and SMART bins totaled about the same as the citywide residential collections—around 25,000 tons (50 million pounds). Although school organics compliance is positive, the school waste stream is only about 1/5 the size of the residential stream and cannot offset low residential participation.
- To effectively improve this situation, collaboration is needed among DSNY, the Mayor’s Office, NYC Council, residents, community organizations and local NGOs, and businesses. Solutions will likely involve multiple approaches and require testing, going beyond claims of simplicity, universality, or planned enforcement. The first step is establishing accurate performance metrics, which this report presents.

Compostable organics properly set out for residential curbside collection

This report will discuss tonnages of compostable organics that were collected 1X weekly in 35 of the city’s 59 sanitation districts in FY2024.

These tonnages reflect residential participation in DSNY’s curbside organics program. All tonnages are sent to composting or anaerobic digestion.

FY 2024 NYC Residential Curbside Organics Performance

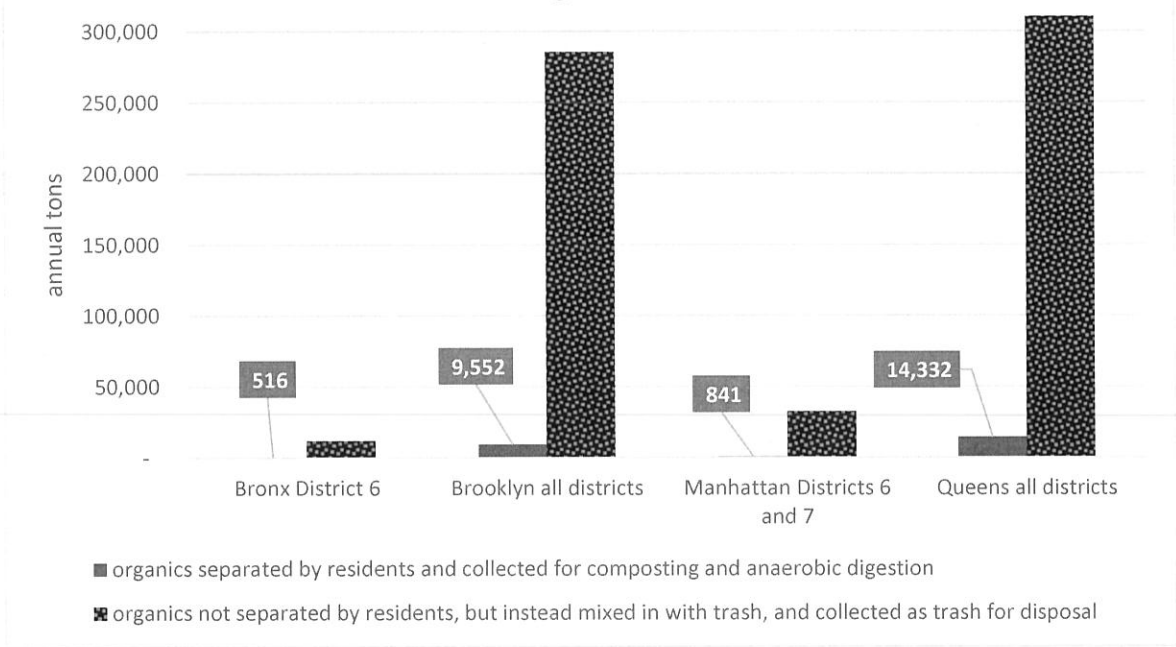


FIGURE 1

Abstract

This report presents performance indicators for the Department of Sanitation New York (DSNY)'s residential curbside organics collection program. The primary metric is the **Capture Rate**, which measures the percentage of compostable organics correctly set out for separate organics collection and subsequently processed through composting or anaerobic digestion into a beneficial end product.

Additional metrics include monthly per-household organics generation rates (both for separated organics and those disposed of in regular trash), and total tonnages collected.

These metrics can be reproduced by any member of the public. Collection tonnage and waste composition data are sourced from NYC Open Data and agency datasets.¹

The results indicate that the curbside organics program is currently inefficient, struggling to optimize truck capacity and delivering limited environmental, social, and economic benefits to the City and its residents, all at a high cost.

This report provides data to highlight the program's low performance as a foundation for developing more responsive, accurate, transparent, and accountable strategies to increase the diversion of organics from landfills and incinerators, where their disposal contributes to greenhouse gas emissions and worsens climate change.

Interpreting the Capture Rate

A 5% capture rate, for example, indicates that 5% of all materials that could have been separated and set out by residents for collection—and subsequently composted or processed via anaerobic digestion by DSNY—were actually separated, set out, and collected. The remaining 95% was disposed of as part of residential trash, which was then collected for export and disposal in regional landfills or incinerators.

In any city, a 5% capture rate would be considered low. For comparison, the capture rate for residential curbside recycling of paper, metal, glass, and plastic is nearly 50%. In contrast, Seattle's residential curbside organics capture rate averages 60%.

¹ NYC Department of City Planning. "Population American Community Survey (ACS) Data Tables," 2022.

<https://www.nyc.gov/site/planning/planning-level/nyc-population/american-community-survey.page>.

NYC Department of Sanitation. "Annual DSNY & Non-DSNY Collection & Diversion Totals," July 2023.

<https://www.nyc.gov/site/dsny/resources/statistics/total-annual-collection-diversion.page>.

———. "DSNY Waste Characterization 2023 - Main Sort Results." NYC Open Data Portal, May 2, 2024.

https://data.cityofnewyork.us/dataset/DSNY-Waste-Characterization-2023-Main-Sort-Results/bpea-2i5q/about_data.

———. "NYC Open Data: DSNY Monthly Tonnages." NYC Open Data Portal, August 8, 2024. https://data.cityofnewyork.us/City-Government/DSNY-Monthly-Tonnage-Data/ebb7-mvp5/about_data.

Introduction

In Fiscal Year 2024, residential buildings in all districts of Queens and Brooklyn received weekly curbside collection of compostable organics (including food scraps, yard trimmings, and compostable paper), as well as trash collection two to three times per week.

Brooklyn residents with curbside organics programs in place generated over 300,000 tons of potentially compostable organics, but the curbside organics program only captured 3.6% of that total for composting or anaerobic digestion. The remaining 96.4% was disposed of as refuse and collected by the NYC Department of Sanitation (DSNY).

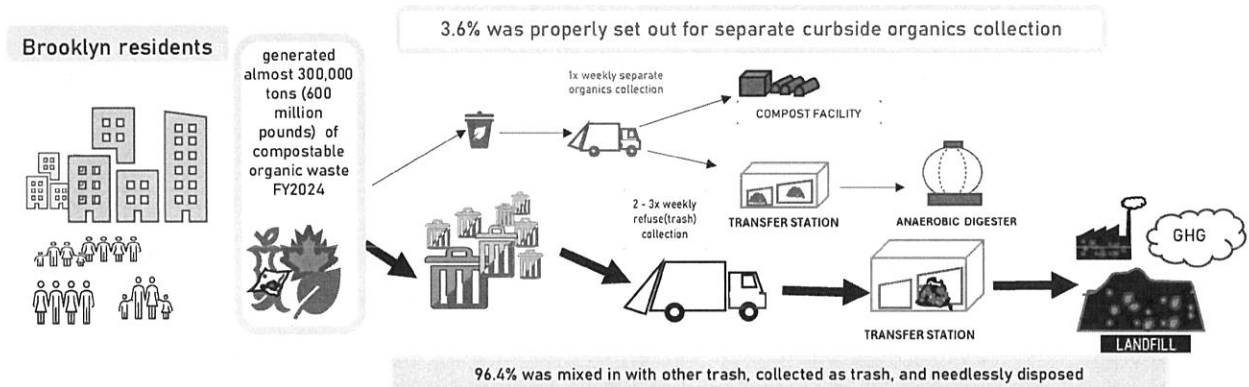


ILLUSTRATION 1.

In Queens, residents generated about 325,000 tons of compostable organics, with 4.3% of that total collected through the curbside organics program. The remaining 95.7% was disposed of as refuse.



ILLUSTRATION 2

These figures do not include the small but significant amounts of composting done by residents through community, on-site and backyard programs. This report focuses on DSNY residential curbside collection because of the significant differences in scale, taxpayer costs, and environmental impact between truck-based weekly collections versus local, non-DSNY alternatives. When DSNY collection trucks are dispatched weekly across Brooklyn and Queens districts and

New York City Residential Curbside Organics Program: FY2024 Quarterly Capture Rate Report © 2024 by Samantha MacBride is licensed under CC BY-SA 4.0. To view a copy of this license, visit <https://creativecommons.org/licenses/by-sa/4.0/>. Contact author at samantha.macbride@baruch.cuny.edu.



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MADRID
CALLE MADO

TRASH

AJA TADY WEE

AJA TADY WEE

Good morning to the Chair and Members of the NYC Council Sanitation Committee. My name is Noah Sheroff. I serve as the executive director of the Bayside Village Business Improvement District in northeast Queens. I would like to thank you for the opportunity to testify today. I appreciate your interest in my input. In addition, I would like to thank Councilmember Paladino for her continued support and advocacy of the Bayside Village Business Improvement District. I would like to provide some insight into a "small BID". Our situation applies to several BIDs across the five boroughs.

The Bayside Village Business Improvement District is a small district covering Bell Blvd in Bayside, Queens from 35th Avenue to Northern Blvd and 41st Ave just off of Bell Blvd – about 10 blocks of commercial, residential, office and mixed use properties. Currently, our assessment is \$230,000 per year. Of that, approximately \$66,000 per year is paid to our contracted supplemental service provider Streetsplus. The BID receives grants but they are not guaranteed year to year and are often, if not always, reimbursement based. We pay money, generally received from the assessment and get that money back. The BID contracts one worker, a rock star named Yow, who works six days per week. According to the September monthly snapshot of the service providers work, 175 service hours were clocked and 501 garbage bags were used. Yow currently places the full bags next to each receptacle for DSNY pickup. The new mandate to containerize bags will not just create a greater burden for Yow but the BID as well: plain litter pickup services cost 28% of the assessment. Adding additional services like hauling all the bags to a central location or carting to a sanitation garage, will further squeeze the budget and make it extraordinarily difficult to run programs such as our very popular events.

Another matter that I would like to bring to your attention is that the practice of improper disposal from the general public still occurs and will continue to occur and neither the BID nor its members should suffer the consequences of a summons. Businesses and owners have received summonses due to improper disposal by the general public. This has become such a concern that one of the property owners, in order to prepare for the containerization of trash for buildings with one to nine units, chained the container to the building and equipped it with two additional chains and locks to secure it.

While I can appreciate getting bags off the streets, a huge concern is that the BID and local businesses and property owners will be fined for improper disposal by the general public. Again, the BID doesn't have the financial capacity to purchase costly containers, hire a carting company or spend their resources paying fines by the City for the public's trash.

Thank you, again, for your time and consideration.



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**The New York City Council Committee on Sanitation and Solid Waste Management
November 20 2024 Meeting
Support for Int 0498, Int 698-2024, Res 0284. Opposition to Int 0057**

TO: City Councilmember Shaun Abreu,
FROM: Ashera Schwartz, BK ROT
DATE: 11/20/2024

Dear Councilmembers Abreu and Zhuang,

Thank you for the opportunity to submit testimony on the bills being presented today which affect the state of compost and organic waste management city wide. My name is Ashera Schwartz, I am a lifelong Brooklynite and am here today as part of BK ROT, NYC's first bike-powered, fossil fuel free composting service. Through community supported work we have diverted over 613 tons of organic waste in the last 5 years, partnering with 5 community gardens, and we have offered residential pickup for almost a decade longer than DSNY in our neighborhoods. We wish to provide our perspective on how to continue increasing city investment in organic waste management sustainability and fairly.

We support Intro 498, with the caveat that communication about organic waste must be transparent. Specifically, anaerobic co-digestion, the dominant method of DSNY's organic waste management, is not composting, and in fact worsens the environmental challenges which composting seeks to amend. Calling it curbside composting is a lie which has justified the defunding and reduction of actual composting in our city. Community gardens should have organic waste options, but they should also know what will happen to it, especially as community gardens have been integral to the establishment of compost infrastructure in New York for decades. Investments in community garden's own capacity to process compost would be more efficient and environmentally friendly as well.

We also want to voice support for the inclusion of community compost as an essential part of Local Law 89, supporting today's Intro 698. Community compost solutions decrease CO2 emissions from trucking, grow knowledge and excitement for green infrastructure, and create high quality compost for local growers, and we urge city council to prioritize supporting community composting rather than continuing to fund anaerobic codigestion or even industrial composting which has its own environmental



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drawbacks. The revision today creates definitions which will help implement LL89 and the support of community compost sites, which we strongly support. For the same reason we support Intro 781.

We also want to voice opposition to Intro 57, increasing penalties for non-compliance with sanitation laws, including organic waste. We are concerned with how this will affect New Yorkers across economic lines; fines create unfair burdens on lower income people for whom a \$100 fine can mean a struggle to pay for living expenses. To increase cleanliness -especially around organic waste- education must be taken seriously, and community composting should lead the way. On the topic of fines it is also worth noting the context of growing collaboration between DSNY and NYPD to abuse street vendors, unhoused people, and protestors in recent years; we strongly oppose sanitation being used as another excuse for racist and classist violent tactics.

Finally, we support Resolution 284; establishing compost programs in CUNY and SUNY colleges in New York City, diverting a large food waste stream. We encourage this proposal to also ensure collaboration with community composters, and the creation of jobs for college students and other youth as part of these programs. We also want to emphasize that this establishes actual composting, rather than anaerobic digestion systems.

Thank you for taking the time to hear our testimony.

-Ashera Schwartz
BK ROT, Grants and Outreach Coordinator
ashera@bkrot.org



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Committee on Sanitation and Solid Waste Management
Containerization of Refuse and Organic Waste

Opposition for **Int 0057-2024** and Support for **Int 0498-2024**, **Int 0698-2024**, and **Res 0284-2024**

To: Councilmember Abreu and members of the Committee on Sanitation and Solid Waste Management

From: Lateshia Peters, BK ROT

Date: 11/20/24

INT 0057

Dear Councilmember Abreu, Zhuang, and members of the Committee on Sanitation and Solid Waste Management,

My name is Lateshia Peters and I'm here with my colleague to speak on behalf of BK ROT, New York City's first community-supported, bike-powered, fossil fuel free food waste hauling and composting service. A little bit about me: I'm a Gen-Z and fairly new Brooklyn resident hailing from Long Island who has been deeply disturbed by the changes in climate from rising sea levels to catastrophic natural disasters and so much more. My own involvement in BK ROT stems from learning about the truth behind DSNY's curbside composting program. After reading a CURBED article written by Clio Chang that reported on where the smart bin compost truck goes, she found that the organic waste is turned into a slurry that is anaerobically digested which becomes methane. Moreover she reported that half of the methane produced is used to power Newtown Creek and the other half is being burned ($\frac{1}{3}$ of the leftover solids are actually composted). Feeling frustrated by the performative efforts of DSNY and disillusionment, I wanted to bring my food scraps to a local place that will process my organic waste and compost it in a way that I know will be reused within the community. So, I did my research and that's where my journey with BK ROT started.

With our staff consisting mostly of local BIPOC youth, our operations provide accessible jobs and sustained professional development for emerging environmental leaders. We take a closed loop approach to composting where the organics that we retrieve from the community are processed at local, publicly accessible sites in Brooklyn. Within the last 5+ years, we've managed to divert 613+ tons of organic waste. We partner with several community gardens across Brooklyn to conduct our operations including Good Life, Imani Gardens, Green Acres and our home base Know Waste Lands. As an organization dedicated to environmental justice and combating our worsening climate crisis, it's imperative that we express our thoughts and concerns about the bills being presented.



BK ROT, Inc.
86 Wyckoff Ave
PO BOX 370538
Brooklyn, NY 11237

We are here to voice our opposition to Int 0057-2024, which would increase penalties for non-compliance with sanitation laws, including organic waste. We are particularly concerned about how these fines could be especially harmful to low-income residents and create further financial barriers for our local community members amidst the prevalent hardships of our existing economic state. We urge the committee to reassess this law with a more equitable framework to enforce sanitation laws that would rather promote more environmental education and/or partnering with community gardens or local composting organizations.



BK ROT, Inc.
86 Wyckoff Ave
PO BOX 370538
Brooklyn, NY 11237

Int 0498-2024

Dear Councilmember Abreu, Zhuang, and members of the Committee on Sanitation and Solid Waste Management,

My name is Lateshia Peters, I am here with BK ROT, an organization that myself and my colleague have described earlier in the hearing. We want to express our support and propose improvements to better Int 498 being presented.

We believe that communication and transparency about what happens to organic waste that is collected by DSNY is incredibly important. DSNY uses anaerobic co-digestion which is a process that mixes waste materials with wastewater in a digester to produce biogas and manage waste. However, this waste is mixed with sewage slurry and emits more harmful greenhouse gasses. The kind of waste management that we do is composting which is an aerobic process that recycles organic matter into a valuable fertilizer that can enrich soil and plants. The benefits of composting include but aren't limited to reducing waste stream, cutting methane emission from landfills, improving soil health, lessening erosions, and reducing food waste.

We do agree that community gardens should receive as many resources as they need for their flourishing which should include an option for DSNY to collect their organic waste. Although, DSNY should be transparent with community gardens about what happens to this organic waste: Where does it go? How is it managed? Is it even worth giving it to DSNY for collection? Community gardens play an integral role in our community in regards to urban environmentalism, composting education and infrastructure in NYC. Miscommunication from DSNY about what happens to the organic waste they collect from residents has not only been harmful to our business (our residential clients have been cut in half since this new program) but it has disillusioned the public and has continued to do more harm to the environment (which is counterintuitive to our fight against fossil fuels and saving our planet).



BK ROT, Inc.
86 Wyckoff Ave
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0698-2024

Dear Councilmember Abreu, Zhuang, and members of the Committee on Sanitation and Solid Waste Management,

My name is Lateshia Peters, I am here with BK ROT an organization that myself and my colleague have described earlier in the hearing. We wanted to share our support for Local Law 89 and the revisions described today. BK ROT is a pioneer in pursuing sustainable, community-oriented organic waste management.

As I have mentioned earlier about community-led composting, there are a plethora of benefits including lower CO2 emissions from gas trucks, initiating community organizing, managing food waste through a closed loop, etc. We want to ensure that NYC's organic waste programs are collecting and processing compostable materials through methods that will significantly lower greenhouse gas emissions and support local composting efforts (empowering residents, partnering with orgs like BK ROT, community gardens, etc.)

We urge that the revisions on the definition will continue to support community composting and maintain its establishment.



BK ROT, Inc.
86 Wyckoff Ave
PO BOX 370538
Brooklyn, NY 11237

Res 0284-2024

Dear Councilmember Abreu, Zhuang, and members of the Committee on Sanitation and Solid Waste Management,

My name is Lateshia Peters, I'm writing on behalf of BK ROT, an organization that myself and my colleague have described earlier in the testimony. We want to share our support for Resolution 0284-2024; which would be establishing compost programs in CUNY and SUNY colleges in NYC to divert a large waste stream from landfills.

As a primarily youth-led organization, it's crucial that we empower and furthermore collaborate with younger generations on food waste management because those students will be our future leaders in a wide array of labor industries. If we could increase environmental and compost education at the college level, this could truly revolutionize how we approach organic waste management by improving sanitation compliance, raising climate crisis awareness and catalyzing the viability of our planet's future. From employing local young people, hosting a youth leaders program for high school students, providing professional resources to our youth, empowering our youth to engage in advocacy such as we're doing now, we want to stress the importance of education, collaborating with young people and organizing the public to combat the worsening climate conditions we're facing.

Thank you for taking the time to read our testimony.

Best,
Lateshia



TESTIMONY BEFORE NYC COUNCIL

COMMITTEES ON SANITATION & CONTRACTS

Oversight Hearing

November 20, 2024

Chairs Abreu, Won and Members of the Committees on Sanitation and Contracts,

My name is Carin Cardone Division Vice President for Block by Block. Block by Block is the nation's largest provider of supplemental sanitation and safety services in the United States providing services to over 160 cities in 32 States and employing over 3,000 employees. I'm testifying today on behalf of Block by Block as the supplemental sanitation service provider to seven (7) NYC BIDs located in Brooklyn: Bedford Stuy Gateway BID, Montague Street BID, Atlantic Avenue BID, Park Slope 5th Avenue BID, Myrtle Avenue Brooklyn, Bay Ridge 5th Avenue BID and Sunset Park BID. Block by Block has provided supplemental sanitation services in NYC since 2011.

We are grateful that you are holding this hearing on waste containerization. For over 40 years, BIDs have been trusted partners to NYC, providing services including supplemental sanitation to districts that had been inadequately served by the city due to scarce resources. Our work includes the bagging and re-lining of overflowing corner basket trash cans which could not be emptied at a fast-enough rate by DSNY. As per the FY23 NYC SBS trends report, BIDs collect or replace over 10,000 trash bags every day. While some larger BIDs are able to haul those bags to sanitation facilities, most medium-sized and smaller BIDs simply set those bags on the sidewalk for DSNY pick up, which is our current practice for the seven (7) BIDs we provide services to in Brooklyn. Other BIDs have opted into the clean curb pilot program to reduce the number of bags at key corners but expanding containerizing to accommodate all of the public trash that BIDs bag would be far too costly for many BIDs including all of our current BID customers in Brooklyn. Several of our customers include Montague Street, Bed Stuy Gateway and Atlantic Avenue BIDs currently have clean curb containers in their district, but they do not provide the capacity to house all trash bags our employees use on a daily basis in these very busy corridors and we estimate only 15% of trash bags in these districts being secured.

The New York City Department of Sanitation (DSNY) has now issued a mandate saying BIDs must somehow either haul away or containerize the bags, rather than staging them at corners



until DSNY pick up and, if BIDs fail to do so, they will be fined for the “improper disposal” of garbage. While we completely understand the desire to “get bags off the street” this is a huge operational and financial burden for BIDs and our workforce. While BIDs are ready partners in getting trash off the streets, these changes to our operations would be financially impossible for all of Block by Block’s customers. There’s also the complexity of siting containers with DOT and local stakeholders. We are grateful that, thanks to the advocacy of the City Council and City Hall, this mandate has been postponed, but we remain deeply concerned that it is still on the horizon with no clear plan for implementation. The NYC BID Association has submitted a list of operational questions about the mandate to City Hall and DSNY on September 20, 2024 but have not yet received a response.

As you know, BIDs are established through a legislative process and are largely funded by assessments on the properties within our districts. BIDs use these assessment dollars to provide our services, including supplemental sanitation. The services provided are based on BIDs districts plans administered through a contract with Department of Small Business Services. An operational increase of this magnitude would be far beyond our BID customers budgeted expenditures for this fiscal year, which have already been approved by their boards of directors (boards which include representatives from the Mayor, City Council, Borough President and City Comptroller). For most BIDs, it would likely take multiple years to ramp up to the full “no bags” goal. This new unfunded mandate could also, for some districts, necessitate raising their assessment ceiling, a legislative process that can take two years to realize.

There is a real possibility for Block By Block’s Brooklyn BID customers, if faced with the potential for fines from DSNY for their normal operations, would have no choice but to cease supplemental sanitation services altogether. In that case, the city would not have bags on the street – it would have overflowing trash cans along the nearly 300 miles of key corridors across the city. This is not what our Brooklyn BID customers want, this is not what Block by Block wants and we suspect it is not what DSNY or the Mayor wants. Block by Block remains committed to partnership our Brooklyn BID customers, DSNY and the City of New York, but will continue to push for clarity, flexibility, and support in order to meet this unfunded mandate.



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Testimony on Int. No. 57 (Penalties for failure to store waste in a satisfactory manner in required receptacles), 11/22/24

My name is Lauren Elvers Collins and I'm the Executive Director of the Church Avenue/Flatbush Avenue Business Improvement District, d/b/a the Church-Flatbush Community Alliance (CFCA). I urge the Committee on Sanitation and Solid Waste Management to vote "no" on Int. No. 57.

The CFCA serves close to 500 businesses and almost 300 properties in Flatbush, Brooklyn, a neighborhood that has been historically underserved and which has an ongoing sanitation problem which it manages as well as possible. The district covers 1.5 miles of commercial and mixed-use properties. We spend roughly half of our \$589,000 annual assessment on sanitation services and 30-40% of staff time on sanitation initiatives and planning. We hire a supplemental sanitation company which provides three workers per day (7:00 am – 3:00 pm) who sweep sidewalks and, when public litter baskets start to fill up, remove and tie the bag and place it next to the public litter basket, and put a fresh bag in the basket. All in all, the public trash in our district adds up to around 55 bags per day.

We also were a part of DSNY's Clean Curbs program which allowed us to install three CitiBin locked containers which our team still uses to store bagged public trash from the neighboring blocks and which DSNY empties daily. The entire cost of these bins – approximately \$20,000 for all three - was reimbursed by DSNY.

An unfunded mandate forcing BIDs to install costly containers or modify their supplemental sanitation procedures would force smaller BIDs like ours to halt many other programs that benefit our businesses and the local community, like free community events, small business support, and safety and quality of life programs. We do not have the funds to purchase the ten additional containers that would be needed to store all the trash in our public baskets, nor a garage to store full bags, nor a vehicle to transport them to the local DSNY garage.

What we would love to see to address sanitation issues in NYC commercial districts:

- DSNY working alongside BIDs to find a solution that doesn't shift a City responsibility on the backs of businesses. BIDs are some of the few nonprofit, non-municipal

organizations with “clean streets” as part of their mission. We live and breathe sanitation, and are constantly on the ground looking for ways to do it better.

- The NYC BID Association submitted key questions which have come up from us and the other BIDs about DSNY changes regarding BIDs. We eagerly await the answers so we can understand the proposed policy and keep it in mind when doing planning.
- Ensure that improperly disposed bags are not included in this program. In our district, we see as many as 35 improperly disposed bags per day. These bags are dumped at all hours. We don’t have the manpower to remove those throughout our 1.5 miles of district.
- If containerization is required, provide BIDs with containers at no cost to us and make siting them easy. As a pilot of DSNY’s Clean Curbs program, we’ve learned a lot about what does work and what could work better.

We urge the Committee to not approve Int. No. 57. I can be reached at LaurenC@churchflatbush.org.

Sincerely,



Lauren Elvers Collins

Executive Director



**TESTIMONY BEFORE NYC COUNCIL
COMMITTEES ON SANITATION & CONTRACTS
Oversight Hearing
November 20, 2024**

Chairs Abreu, Won, and Members of the Committees:

Good morning. My name is Tamara Greenfield, and I am the Vice President of Public Space and Operations for the Downtown Brooklyn Partnership (DBP), the organization that manages three Business Improvement Districts (BIDs) that cover Downtown Brooklyn. Downtown Brooklyn is one of the nation's fastest-growing downtowns. It is home to more than 62,000 residents and serves as a major office, civic, educational, cultural, and shopping hub for Brooklyn and NYC. Such vibrant activity brings with it large quantities of trash, making effective waste management a top priority for our organization.

We are grateful to be able to testify today because, with you, and the city's 76 BIDs, we are all committed to clean, well-maintained streets that support pedestrian access, small business activity, and a welcoming public realm free from overflowing trash cans, trash bags, and rats. For decades, BIDs like ours have been active partners with the City in achieving these goals.

At DBP, we go above and beyond in managing trash collection. DBP transports ALL supplemental trash from our district directly to a DSNY depot. To maintain cleanliness, DBP operates two dedicated trucks and crews, which collect trash from 11 staging locations and 167 BigBelly solar compacting units, completing 8 circuits daily. **Each day, we transport approximately 550 bags—or 22,000 gallons—of street trash directly to DSNY facilities.** To achieve this high level of service, **DBP invests more than \$3 million annually, nearly one-third of our budget,** in contracts. You can only imagine what the streets of Downtown Brooklyn would look like if the neighborhood relied on DSNY service alone.

But even a well-resourced organization like ours faces challenges. Of our 11 staging areas, only 5 are equipped with streetside containers and some of these need replacements. Fully containerizing all our staging areas would require a significant investment of approximately \$150,000, that we are not budgeted for. Were the City to mandate such containerization, would it also provide the funding to fully support it?

Moreover, securing permission for curbside containerization has been a historically difficult and time-consuming process. The Department of Transportation (DOT) has rejected most of our proposed sites, and understandably, private property owners resist having trash containers placed in front of their buildings.

We strongly support containerization where feasible, but we are seeking a shared vision for achieving this in our dense, contested streetscape. Our district faces complex challenges, including:

- Residents in small buildings with no interior storage options for bins, leaving trash containers to be placed on sidewalks in front of storefront businesses;



- Large multi-unit residential buildings with insufficient space for on-site containerization, resulting in walls of trash bags on sidewalks;
- Competing demands for curb space from bus and bike lanes, loading zones, outdoor dining, and pedestrian seating areas.

We work closely with the City to manage competing priorities, but without a unified vision or a clear process for reconciling these needs, progress on containerization will remain piecemeal, slow, and potentially penalize those working towards a solution. BIDs already invest significant resources to support DSNY and keep our streets clean. Until the City develops a comprehensive strategy to balance essential services and competing curbside uses, threatening fines for BIDs' hard work and investment feels short-sighted and counterproductive.

We urge the Council to focus on fostering collaboration, providing resources, and establishing a clear, coordinated plan for containerization and waste management. This approach would be far more effective in addressing shared goals and ensuring cleaner, healthier streets for all New Yorkers.

Thank you for the opportunity to testify today. I am happy to answer any questions.



Dumbo Improvement District
20 Jay Street, Suite 510
Brooklyn, NY 11201

Wednesday, November 20, 2024

Chairs Abreu, Won and Members of the Committees on Sanitation and Contracts,

My name is Kalvis Mikelsteins and I am submitting testimony today on behalf of the Dumbo Business Improvement District. In my role as Vice President of Planning and Operations, I have managed the District's supplemental sanitation program for the past 5 years.

One of our key services is bagging the public trash disposed of by the citizens and visitors to New York- a job that traditionally falls to the municipality.

Since its formation in 2006, the Dumbo BID has worked hand in hand with DSNY to help support sanitation efforts in the district. Throughout the years, the BID sanitation team has worked closely with our local sanitation yard, emptying corner bins of their public waste, and coordinating pickups throughout the district, greatly simplifying the process of trash removal for DSNY in Dumbo. Our sanitation team also works diligently to remove illegal dumping throughout the neighborhood, accelerating removal and saving DSNY time and effort tracking down these illegal dumpers.

The BID is ready and willing to partner with DSNY, DOT, and the City to help containerize our waste. The opportunity to help beautify our streetscape, and reduce rodent issues is undeniably a great idea. However, an increase in service of this measure requires serious financial investment, possibly causing an assessment increase by the BID, a further burden on our local small businesses. The inability to add this funding until the next fiscal year, coupled with the added risk of fines make this a heavy financial burden. The BID asks the City to investigate opportunities to support the program with additional funds through grants or other programs.

Moreover- the citing of these containers will require a major effort between the BID, City agencies and our community stakeholders. This will take time and has not yet begun. The Dumbo BID hopes to engage with DSNY in meaningful, constructive discussion to help craft a solution that helps keep our District clean and rodent-free. We need clear guidance; resources; and agency input to do so.

Thank you for your time and consideration.

Kalvis Mikelsteins
Vice President, Planning and Operations
Dumbo BID

Hello. My name is Marisa DeDominicis. I am a co-founder and Executive Director of Earth Matter NY Inc., and a member of the Save Our Compost NYC Coalition. I have been involved in NYC composting since 1983.

Today, I am sharing **my support** for two bills for this hearing:

[Int 0498-2024](#), which requires the Department of Sanitation to collect organic waste from community gardens. Organic waste collection needs to increase. This bill allows community gardens to increase their collection capacity and not turn away material that could potentially end up in the trash. We encourage the creation of compost not biogas. Although not specified in this version of the bill, there is concern that organic waste collected by DSNY will not be turned into compost for soil amendments but instead sent to co-digestion facilities.

[Int 0698-2024](#), which clarifies that organic waste drop off sites, for the purposes of complying with Local Law 89, cannot be considered to simply be a standalone, orange Smart Composting Bin.

I oppose [Int 0949-2024](#) which would require that someone who manages or controls a building with 100 units or more provide a dumpster for refuse. This bill is problematic for two reasons: (1) It is not practical because the requirements are unreasonable – buildings over 100 units in NYC have no space for a roll off container on their sites, and they can't be retrofitted into buildings. (2) It incentivizes trash not separation of recycling and organics, which gets us further from zero waste.

Additionally I would like to take this opportunity to thank the City Council for supporting community composting in FY25. By restoring our budget, Earth Matter's work and the work of our collaborators and partners has a path forward to assist the increase of New Yorkers participation in composting - a potent solution to our broken current NYC sanitation situation.

The City Council needs to continue to support legislation that protects, strengthens, and expands community composting across the City. I urge the Council continue, and increase funds for community composting to support our efforts to reduce greenhouse gases and provide an incredibly rich soil amendment for use in our City's green infrastructure, which in turn contributes immeasurably to the mental and physical health benefits for New Yorkers - and hope for our future.

Thank you for your time.
Sincerely,

Marisa DeDominicis



**TESTIMONY BY WILMA ALONSO, PRESIDENT & CEO, FORDHAM ROAD BID
COUNCIL COMMITTEE ON SANITATION AND SOLID WASTE MANAGEMENT
(JOINTLY WITH COMMITTEE ON CONTRACTS)
WEDNESDAY, NOVEMBER 20, 2024**

Thank you Chair Abreu, Chair Won and members of the committee for the opportunity to submit testimony today. My name is Wilma Alonso and for the last 20 years, I have been the president and CEO of the Fordham Road BID (Fordham BID). Fordham Road is the busiest commercial corridor in the Bronx and one of the busiest in New York City, home to more than 300 businesses, both large and small.

Over the last few years, Fordham BID has had to navigate numerous public safety challenges that have arisen due to overcrowded sidewalks that also impact Sanitation operations. More recently, our BID completed a Commercial District Needs Assessment which identified that the two top issues in our neighborhood are public safety and sanitation. These two issues go hand in hand with the policy consideration being heard today.

Fordham BID has performed supplemental city services since our inception to beautify our neighborhood and keep it clean, including through sanitation and our lean but mean, clean teams. They are the beating heart of our beautification efforts. Fordham BID appreciates the dedication of DSNY to containerize all trash and those results have certainly bore fruit. However, requiring BID's to containerize all garbage 24/7/365 is a drastic policy shift that is incredibly problematic for numerous reasons.

First, smaller BIDs like Fordham BID simply don't have the resources to ensure containerization. Fordham Road is a major shopping and transit hub, marked by heavy pedestrian traffic and high public transit use, with over 80,000 daily visitors— 88% of whom arrive by foot or transit. Consequently, more than 33% of the Fordham Road BID budget is dedicated to supplemental sanitation services. The BID collects and removes an average of 12,000 trash bags per quarter, making containerization under the new mandate exceptionally challenging. Adding containers curbside is also difficult as Fordham Road has a bus lane that runs along the curb, leaving the sidewalk as the only alternative. However, our sidewalks are already crowded and containerizing 12,000 trash bags would require a substantial number of bins. Rising operational costs due to new insurance requirements, inflation, minimum wage increases, and other expenses further strain resources. In the interest of fiscal responsibility, Fordham BID would require significant additional resources and funding to comply with this new mandate.

Second, several of our businesses have informed Fordham BID of fines they have received from DSNY for trash on the sidewalk when the trash was left by a food or street vendor in front of their shop. Fordham BID is deeply concerned we will be blamed for trash that is not ours, especially on days when the number of food and street vendors tops more than 300. We also share concerns of how containerization on streets just outside our boundaries will be enforced.

Third, Fordham Road BID doesn't own any of the trash cans in the district, adding another complicated layer of compliance. And with a curbside bus lane and limited public space, a lot of questions remain on the lack of infrastructure we have to accomplish the city's goals here.

In conclusion, the Adams administration has championed community engagement and transparency. Since DSNY communicated its intent to require containerization of all trash, we have not received any guidance or directives on how small BIDs like Fordham BID would possibly be able to comply. We share a common goal of pristine neighborhoods. It's a reason why BID's were created in the first place. I'll end with saying that we look forward to working with the City to not REPLACE, but supplement sanitation and to develop a system of containerization that is equitable. Thank you.

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November 20, 2024



Hudson Square
Business Improvement
District

Committee on Sanitation and Solid Waste
Management

Oversight – Containerization of Refuse and
Organic Waste

Re: T2024-0057

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David Scatterday
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Rhonda Singer
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Cass Smith
Cass Calder Smith Architecture +
Interiors

Adam Steckler
Storage Mart

Elected Officials
Mayor Eric Adams

Comptroller Brad Lander
Borough President Mark D. Levine

Council Member Erik Bottcher

Samara Karasyk
President & CEO

I am Corey Kunz, Senior Vice President of Operations and Administration for the Hudson Square Business Improvement District (HSBID). Since 2009, HSBID has overseen the transformation of Manhattan's former Printing District into a thriving creative hub. The area we manage is generally bounded by Clarkson Street in the north, 6th Avenue in the east, Canal Street in the south, and West Street in the west. I am here today to comment on the new containerization requirements in New York City. Legislation being discussed today increases the penalties for failure to store waste in in required receptacles and at mandated times on the street or sidewalk prior to collection by the Department of Sanitation (DSNY).

While we understand and support the public policy to "get bags off the street" and have actively participated in the Clean Curbs program to reduce bags in our district, we are concerned with how containerization efforts will impact Business Improvement Districts (BIDs). Over the past two years, DSNY has expressed to us and our colleagues that organizations like ours will no longer be able to bag public garbage and leave it on the street for DSNY to collect. Instead, we will be expected to cart garbage to a DSNY garage or purchase enough containers throughout the neighborhood to store bags awaiting pickup by DSNY. This approach would be a huge financial and operational burden for HSBID and all BIDs across the City.

BIDs provide supplemental services to support integral city services and are reliant on Department of Sanitation employees to remove the public garbage that BIDs bag so that public garbage containers do not overflow. HSBID works closely with our local DSNY garage to make sure that illegal dumping and refuse are quickly taken off the street. Moving all sanitation services to BIDs would require that they provide essential city services as non-profits who are city partners.

Unlike other BIDs that focus mostly on sanitation and security, HSBID was founded to implement streetscape improvements to make Hudson Square a place that prioritizes people over vehicles. HSBID has installed over 500 Hudson Square Standard Trees with enlarged tree pits and permeable pavers, expanded and renovated a 7-block stretch of Hudson Street with wider sidewalks, greening and seating, and created new open spaces at Spring Street Park and Freeman Plazas. HSBID's District Plan does not include supplemental sanitation in its list of core services provided to the community. HSBID started supplemental sanitation services in the fall of 2020 because of service reductions at DSNY during the COVID-19 pandemic to keep our district attractive and welcoming as we were trying to lure office workers and visitors back to the neighborhood.



Hudson Square
Business Improvement
District

In the case of the Hudson Square BID, we are concerned these financial penalties and the exorbitant cost to comply with this new mandate could force us to cease providing supplemental sanitation services entirely, which would result in overflowing trash cans and dirtier city sidewalks. The timing of this requirement is particularly concerning as our central business district is finally recovering from the economic decline caused by COVID-19. Pedestrian traffic is currently increasing as we welcome new major office tenants to the district. With more foot traffic also comes more public garbage.

While we support and appreciate the important goal of containerization, it is unfair to burden HSBID with the full cost and penalty of containerizing public trash in our commercial district. As always, we are ready to help move the City towards the goals of containerization, but we must convey our deep concern about potential containerization mandates on BIDs.

JCDecaux

Out of Home media

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Chair Abreu and Members of the New York City Council Sanitation and Solid Waste Management Committee, we submit this written statement in opposition to Int. 1108-2024, (a bill to amend Subdivision 2 of Section 16-118 of the administrative code of the City of New York, in relation to street cleanliness requirements for city concessionaires and franchisees) and to request amendments and further study before the proposed Local Law is voted upon.

I am the Co-Chief Executive Officer of JCDecaux Street Furniture New York, LLC, the franchisee and thus partner of the City of New York in operating the City's coordinated street furniture program. Through this franchise we have installed, we operate and provide daily maintenance for, over 4,000 different pieces of service infrastructure across the City, including over 3,500 bus shelters, newsstands and automatic public toilets. The maintenance standards and the related processes are material, negotiated terms of our agreement with the City. The NYC DOT standards are rigorous and costly to provide.

In fact, the maintenance requirements were detailed in the original request for proposals issued in 2003 ("RFP"), were discussed when we took over the program in 2015 and revisited in 2023 when we signed our amendment. As the agency which is designated to act on behalf of the City under our franchise agreement, the Department of Transportation maintains strict oversight over our activities with the power to impose liquidated damages if we do not meet the requirements of the franchise agreement. This was also a term included in the RFP issued for this franchise.

The terms outlined in Int. 1108-2024 do not align with the terms of our franchise agreement. There is both ambiguity in how such terms would be applied, given that we have so many locations, and concurrently, are in fact, attempting to impose expanded responsibilities beyond those which were already negotiated in good faith between the City and JCDecaux. In plain English, the amendment would violate our contract and may well violated federal and state government contracting legal requirements.

As the world's leading street furniture company operating in over 3,500 cities world-wide, JCDecaux takes its responsibility for maintaining the over 4,000 structures seriously. The cost of the maintenance that JCDecaux provides with its unionized workforce exceeds \$10 million each year. In fact, this franchise is the most expansive and expensive franchise the City has granted.

Further, a decision by a city to impose such consequential revisions onto its existing concessionaires and franchisees who have negotiated terms and have signed agreements with the city would be unfair. That in turn, would have a chilling effect on potential partners contemplating future agreements with such a city.

JCDecaux North America
Empire State Building
350 Fifth Avenue, 73rd Floor, NY, NY 10118
Tel: (646)834-1200 - Fax: (646)834-1202 - www.jcdecauxna.com



We urge the committee to take its time to review all the facts before voting on the proposed amendment.

Thank you for your attention and consideration.

Alan Sullivan

Co-Chief Executive Officer

JCDecaux Street Furniture New York, LLC

Lyft Urban Solutions / Citi Bike Testimony

**Miller Nuttle - Micromobility Policy Director, Lyft Urban Solutions / Citi Bike
to the New York City Council, Committee on Sanitation and Solid Waste Management
November 20, 2024**

I want to thank Chairperson Abreu of the New York City Council's Sanitation and Solid Waste Management Committee for hosting this hearing today.

My name is Miller Nuttle, Micromobility Policy Director with Lyft Urban Solutions, which operates New York City's Citi Bike program. Citi Bike operates a network of over 2,200 stations and 34,000 bicycles. This system, which supports over 40 million bicycle trips annually, has become a foundation part of New York's sustainable transportation landscape.

We write to oppose Int 1108-2024, which would empower Department of Sanitation enforcement agents to issue fines to City concessions and franchises who fail to adequately keep their structures free from "garbage, refuse, rubbish, litter, debris and other offensive material." As we discuss below, if applied to Citi Bike this legislation is duplicative to pre-existing contractual obligations in Citi Bike's contract with the NYC Department of Transportation (DOT), and would introduce undue financial penalties to a program that already faces financial accountability for ensuring a clean station network.

Citi Bike and our partners at the Department of Transportation take our responsibility to maintain and clean our station and bicycle equipment seriously. Citi Bike's contract with DOT lays out rigorous Service Level Agreements (SLAs) for station cleaning, requiring Citi Bike to clean each of its 2,200 stations twice per month, at a minimum. For each station that is not cleaned on this cadence, Citi Bike is subject to liquidated damages of \$90 / station per 15-day period. Specifically, SLA 1 of the Citi Bike contract reads:

- "Every Station, as well as all Bicycles present, must be Cleaned, wiped down, and inspected at least one time between the first and fifteenth days of the month, and one time between the sixteenth and last days of the month.
- "Cleaning" shall mean the best efforts of Citi Bike to clean all visible dirt, ink, paint, litter, or any other substance on the Equipment. Citi Bike will remove all graffiti, and stickers. Visits to Stations for regular cleaning and inspection shall include removal of litter, excessive dirt, and debris from the immediate vicinity of the Station. For curb-lane Stations, this must include all areas rendered inaccessible to DSNY sweepers by the presence of the Station. In the event of a targeted and coordinated vandalism campaign, Citi Bike will immediately contact DOT and provide DOT with a specific timeline for cleaning and refurbishment. Upon confirmation and approval of such timeline by DOT, relevant service levels may be adjusted."

To date in 2024 alone, Citi Bike has completed nearly 20,000 station cleanings across our entire network, achieving a level of SLA compliance of 99.71%. In addition to these regular cleanings, Citi Bike also performs additional ad-hoc cleanings if a community member, elected official or

other stakeholder brings a dirty station to our attention. Issuing hundreds or thousands of tickets to Citi Bike for sanitation issues that may occur between our regular, contractually-mandated cleanings could introduce a significant financial burden to the program.

We would be happy to discuss our station cleaning practices with members of City Council at your convenience.



**Morris Park Business Improvement District
966 Morris Park Avenue
Bronx, NY 10462**

November 20, 2024

Public hearing testimony by Dr. Camelia Tepelus, Executive Director of the Morris Park Business Improvement District to the NYC Council Committee on Sanitation and Solid Waste Management, jointly with the Committee on Contracts

My name is Camelia Tepelus, I am the Executive Director of the Morris Park BID in the Bronx, a BID with a \$390,000 in assessment revenue, 1 full time staff member, paying 2 full time supplementary sanitation staff from our vendor Streetplus \$153,000/year, to clean up sidewalks along 21 blocks of commercial corridor on Morris Park Ave in the Bronx.

I am an admirer of DSNY Commissioner Tish's work – which I consider to be transformative for the City, and arguably may become the most substantive impact of the Adams administration on the City operations. I share with Ms. Tish being on the list of NY City & State "Above & Beyond Innovators 2023" issue, on the same page.

I thank the 2 hearing co-chairs for the very pertinent questions related to BIDs and the public trash that we collect. A majority of BIDs are small and medium sized – with budgets under \$500,000, with 1 or 2 staff members. A majority of us are essentially small non-profits, not having the budgets of the 2 of the largest BIDs whose names came up here - the Downtown Alliance (with \$21M in expenditures in FY23) or the Time Sq Alliance (\$25M), that can afford to self-containerize and even transport their trash. We, the majority of us small BIDs in outer boroughs do not.

It was stated by DSNY on this hearing that there are a lot of misunderstandings regarding "BIDs trash". We are not surprised. We have been asking DSNY for something in writing – this proposal – for months. The fact that DSNY did not want to provide us with anything in writing, no document whatsoever, so that we are able to plan, to consider in our budget, to get approved by our Boards, is undermining to our operations, even as we strive to work together and partner with DSNY in this important initiative.

It is critical to remember that even though we/BIDs are privately funded by commercial property owners, we provide a public service – a service ensuring that commercial corridors provide a positive pedestrian shopping experience. We agonize whether we will be required to transport the trash ourselves – which would cost tens of thousands of dollars – which would be unaffordable and would cause us to cut programs – beautification, community events, holiday lights, etc.

In anticipation of the impact of new DSNY requirements on BIDs, MPBID conducted the experiment of instructing our supplementary sanitation staff to stop placing plastic bags near trash cans, and to place them instead inside the cans. Immediately, within days DSNY District 11 contacted us about the change. When we explained that we are doing this in anticipation of a DSNY requirement – this is the message I received:

*“Let’s go back to putting them **next to** the litter baskets. We do not have the rodent problems that some other community boards do. No bags will be left out for more than 24 hours and the litter baskets will have room for their intended use. If there is a storage solution up ahead (using DOT street space) then let’s hope for that. If anyone ever asks the BID about the bags left next to our baskets, just show them this email and give them my name. (Message received on October 1, 2024).*

The point made here is that there is a significant and troublesome discrepancy between the DSNY executives and policy makers testifying in front of your, and the DSNY operational staff on the ground. We are suggesting that before issuing a mandatory policy in writing regarding “BIDs garbage”, which is simply public garbage that BIDs gather – that the DSNY policy makers contact their operational staff and instruct them to reach out to us so that together we devise a strategy that is optimally applicable to each commercial corridor’s needs, in cases where there are BIDs covering/by law designated commercial corridors.

We are here to work together and to partner with DSNY in keeping our city clean in creating a thriving environment for small businesses and neighborhoods.

I thank Council Member Abreu and Committee Co-chair Ung for the thoroughness of their lines of questioning on matters relating to BIDs and our opportunities to fairly engage with DSNY on this matter.

Thank you for your consideration to our testimony on this matter.

Dr. Camelia Tepelus
Executive Director
Morris Park Business Improvement District
Ed.morrisparkbid@gmail.com

Phone: [REDACTED]



Testimony in Support of Intros 0284, 0781, and 498

November 20, 2024

Good afternoon, my name is Niki Cross and I am a staff attorney in NYLPI's Environmental Justice program. Thank you to Chair Abreu and members of the committee for the opportunity to testify and for continuing to advance programs and legislation that will help New Yorkers reduce the millions of tons of waste we unnecessarily dispose in landfills and incinerators each year.

As we prepare for the transition to a federal administration that has denied the root causes of climate change and threatens to roll back federal safety standards, it is more critical than ever that municipal and state government take aggressive steps to reduce greenhouse gas emissions, protect public health in environmental justice communities, protect worker and public safety, and create good, local green jobs in composting, reuse, and recycling.

We strongly support Intro 0284 and Intro 0781 which together would ensure that all city agencies, CUNY facilities, and SUNY facilities manage organic waste as a recyclable material. This is critical to reduce the large amounts of waste generated and disposed by public agencies and universities, and to ensure that the millions of New Yorkers who work and interact with these agencies can abide by a single, simple set of recycling rules at work and at school.

We similarly support Intro 498 which would enable more New Yorkers to recycle organic material at community gardens.

In parallel with these public sector programs, it is urgent that we implement and enforce robust organic waste recycling and food donation programs and rules across our huge commercial sector so that New Yorkers can be assured that this material is being donated or composted wherever they work, eat, shop, or recreate.

Today is the fifth anniversary of the signing of the landmark Commercial Waste Zones Law, which remains our best opportunity to simultaneously reduce disposed commercial waste, eliminate millions of unnecessary truck miles, improve worker safety, and reduce pollution in environmental justice communities overburdened by private transfer stations and truck yards.

After years of delays, there is some progress in implementing this law as the first of twenty commercial waste zones goes into effect in Central Queens. But one of twenty zones is not enough to achieve the transformative vision that our coalition and the City Council fought for

over the past ten years. We urge DSNY to fully implement CWZ citywide as soon as possible and to ensure that haulers designated to serve in each community's businesses are held to the highest environmental, labor, safety, and customer service standards.

Finally, we support the public health goals of the legislation on waste containerization being considered today, and appreciate that minimizing the amount of time piles of garbage bags occupy sidewalk and street space promotes accessibility for people with disabilities and pedestrians. As new containerization rules are adopted, we stress the ongoing need to minimize the potential for obstructions for pedestrians with disabilities as well as access to the curb for Access-A-Ride, paratransit, and emergency vehicles.

We appreciate the Council's ongoing role in overseeing this critical reform along with the complementary zero waste initiatives being considered today.

Sincerely

Justin Wood and Niki Cross
New York Lawyers for the Public Interest



**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
Jointly with the Committee on Contracts
Oversight Hearing on Containerization of Refuse and Organic Waste
November 20, 2024**

My name is Alia Soomro and I am the Deputy Director for New York City 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 Abreu and members of the Committee on Sanitation and Solid Waste Management for the opportunity to comment.

Food waste is the third largest source of New York City's overall emissions according to the City's [integrated NYC Greenhouse Gas Inventory](#), after buildings and transportation. Twenty percent of New York City's greenhouse gas emissions come from household food consumption. When food waste is sent to landfills, which are disproportionately located in low income and communities of color, organic waste decomposes to create methane gas, a powerful greenhouse gas more than twenty times more potent than carbon dioxide. Neighborhoods near polluting facilities like waste transfer stations and incinerators have higher rates of pollution, which cause disproportionately higher cases of asthma, cancer, and other health issues and compound already existing environmental and racial inequities.

We have supported moving our City towards waste containerization and are excited to see DSNY's proposed rules for a pilot program in Manhattan Community District 9 roll out, especially since similar programs have been long established in global cities such as Barcelona, Paris, Amsterdam, and Buenos Aires. Waste containerization is important not only from a climate and environmental justice perspective, but also for improving New York City residents' quality of life. Containerization will reduce litter on the ground, the mounds of plastic trash bags on our sidewalks, and the rat population, which is particularly important to Manhattan CD 9 because it is one of the rat mitigation zones designated by the Department of Health and Mental Hygiene. A portion of this area was also the subject of a much smaller scale pilot program for containerization that resulted in fewer 311 rat complaints in the area. Waste containerization also has the potential to revitalize our City's streetscapes and sidewalks for public use.

We understand that New York City's cityscape and density varies widely, from 1-2 families, to 3-6 story walk-ups, to large 5 -12 story buildings to towers. So, as DSNY recognizes in this initial pilot program, there is a need for more than one single containerization solution citywide. With that said, NYLCV hopes that DSNY can move towards a comprehensive containerization

program that includes trash, recyclables, and organic waste to increase diversion rates. We also hope that a program can one day include shared building containers for smaller buildings in order to preserve space for other public uses.

As the DSNY pilot program progresses, we underscore the need for long-term funding for Automated Side-Loading Trucks and containers. In the future, NYLCV hopes the City learns from the pilot in CB9 to implement and fully fund a permanent citywide waste containerization program on our streets to streamline waste and prevent buildup on sidewalks and trashrooms.

Legislation

In terms of the legislation being considered today, NYLCV supports Intro 781, sponsored by Council Member Nurse, requiring the Commissioner of Sanitation to designate organic waste as a recyclable material for city agencies. We are very happy to see the residential curbside organics program rolling out in all five boroughs. With this bill, city agencies can lead by example by requiring organic waste as recyclable material and help us move closer to our zero waste by 2030 mandate.

Similarly we support the intent of Intro 498, sponsored by Council Member Abreu, requiring DSNY to collect organic waste from community gardens. Now that New York City is requiring a residential organics collection program, and Intro 130-A was passed just last week, establishing composting facilities in parks, we hope to see more organics collected throughout the City from various sources. We believe an online application is unnecessary, however, if DSNY is collecting organic waste from residential areas on a weekly basis; ultimately, we think community garden organic waste should become part of the residential organics pickup that DSNY does.

NYLCV supports the intent of preconsidered 2744, requiring DSNY to establish a program requiring all residential buildings with 10 or more dwelling units to place residential waste in stationary on-street containers provided by DSNY by 2032. With that said, we are excited to see how DSNY's pilot program is implemented and what lessons can be learned for a more complex citywide program, and we hope those lessons are incorporated into this bill language. Since New York City neighborhoods and buildings vary greatly, even at the block level, we believe any containerization program needs to be well thought out and balanced with other competing public use needs, such as bike lanes, bike sharing programs, green infrastructure, and more.

Similarly, we support the intent of preconsidered 2746, requiring DSNY, DCAS, and DOE to create a program that would require City-owned non-residential buildings dispose of their waste in containerized waste receptacles placed outside of such buildings 2030. Given the complexity of building types and location of City-owned non-residential buildings, including NYC schools and office buildings, we suggest that this bill consider requiring DSNY to complete a study and report of how a containerization program could work for City-owned non-residential buildings.

Providing permanent, sealed containers throughout the City to hold trash bags prior to collection can mitigate the issues of the bags being opened by rodents and will create a cleaner city.

Ultimately we want to invest and improve our streetscapes and work toward our City's zero waste by 2030 mandate to reduce the amount of waste sent to landfills. At the moment, competition for curb space has been front and center. Getting trash off the sidewalk creates more opportunities for beneficial use of public space like bioswales, bike corrals, sidewalk seating, bus shelters, delivery microhubs, and pedestrian plazas.

Thank you for the opportunity to speak.

Tiera Mack, Executive Director of the Pitkin Avenue BID, is a current CITIBIN user opposed to mandatory containerization for BIDs and commercial corridors.

The Pitkin Avenue BID has an assessment of \$225,000, covers 32 block faces, and currently holds 52 litter baskets over 64 corners. The Pitkin Avenue BID has both in-house sanitation and a vendor. In FY24, our in-house and vendor sanitation staff provided 6,206 service hours, with the vendor providing 2,187 hours at \$32.99 an hour and in-house providing 4,019 hours at \$19 an hour. In FY24, our total spent on sanitation was \$145,137, with BID Assessment covering \$92,912.06 and grants covering \$51,013, and the majority is from the Small BID grant, which is not baselined or guaranteed year over year.

We currently have 13 modules over 3 locations, and they hold 65-50-gallon bags. The BID team containerizes about three hours a day, approximately \$19,950 a year (350 days), excluding 15 days when we may need more staff to containerize.

Though commercial corridor containerization has many benefits, there are also many limitations, such as:

- **Illegal dumping** counteracts the intention of the program.
- **Staff and labor costs.** This is a \$ 20,000-a-year cost in addition to street sweeping.
- **Pay Equity.** In-house and vendor staff who receive lower pay are expected to do the jobs of DSNY staff.
- **Maintenance costs.** Since our July 2022 installation, the BID has spent about \$7,500 on lock replacement, door repair, and other related expenses.
- **There are fights over public space. The community moving the units from the curb to the sidewalk will prevent DSNY pick-up.**
 - Reduced parking is crucial in BIDs that are further away from train stations and have limited parking spaces or lots.

The New York City Council
Committees on Sanitation and Solid Waste Management; and Contracts
Testimony from Matt Jozwiak, Founder and Chief Executive Officer of Rethink Food NYC, Inc.
Re: Oversight: Containerization of Refuse and Organic Waste and Int. 0781-2024
Wednesday, November 20, 2024

Good morning, Chair Abreu, Chair Won and Members of the Committees on Sanitation and Solid Waste Management; and Contracts.

My name is Matt Jozwiak, and I am the Founder and Chief Executive Officer of Rethink Food, a New York City-based nonprofit committed to creating a more equitable and sustainable food system where every New Yorker has access to dignified, nutritious, and culturally competent meals.

I am here to express Rethink Food's strong support for *Int. 0781-2024*, which would require the Commissioner of Sanitation to designate organic waste as a recyclable material for city agencies, and *Int. 0498-2024* which would allow the City to collect organic waste from community gardens

Rethink operates two innovative programs across all five boroughs and 35 council districts:

- Our Sustainable Community Kitchen transforms excess food from restaurants, corporate kitchens, and grocery stores into nutritious meals for community-based organizations (CBOs) and migrant shelter sites—simultaneously addressing food waste and food insecurity.
- Through Rethink Certified, we partner with restaurants to prepare meals for CBOs and shelter sites, ensuring culturally appropriate food while sustaining local businesses and preserving jobs in our communities

Since our founding in 2017, Rethink Food has rescued over 10 million pounds of excess food and delivered more than 14 million meals to New Yorkers facing food insecurity. Our network includes over 100 food donor partners and 150 community-based organizations, demonstrating the powerful impact of collaborative solutions to food waste and hunger. Working alongside our partners, we've developed innovative models that maintain the dignity of communities while ensuring that quality, nutritious food reaches those who need it most.

The parallel crises of food waste and food insecurity are deeply interconnected throughout the United States, and New York City is no exception. A 2023 Department of Sanitation study revealed that New York residents disposed of 1.2 million pounds of food, with approximately 86 million pounds of residential food waste trapped in enclosed packaging. While food waste permeates every level of our food system—residential, commercial, and governmental—the public sector's contribution remains particularly challenging to address.

Our partnership with NYC Health + Hospitals demonstrates the immense potential for government agencies to address these challenges. Through our work at four Humanitarian Emergency Response and Relief Centers, we delivered over 5.4 million meals in just ten months. Of the meals available for food rescue, we successfully redirected 41% - nearly 34,000 complete meals - to community-based organizations, along with an additional 34,000 meal portions. Through staff retraining and implementing

more efficient ordering systems, we've achieved remarkable results: at our NYCEM sites alone, we've seen a 192% decrease in discarded meals in just the past month.

Currently, city agencies face unnecessary barriers to composting, recycling, and donating perfectly edible food. At Rethink Food, we combat this daily through enhanced food quality standards, robust data collection of surplus food, and efficient transfer of excess food to CBOs. The passage of *Int. 0781-2024* would redirect millions of pounds of organic food waste back into our food supply and create new opportunities for businesses to collaborate with city agencies in reducing waste and fighting food insecurity across the five boroughs. Moreover, the passage of *Int. 0498-2024* would allow the Department of Sanitation to collect organic waste from community gardens, which serve as important havens in our communities to combat food insecurity.

I extend my gratitude to Chair Abreu, Council Members Nurse, Osse, Menin, Hudson, Salaam, and Public Advocate Williams for their legislation being heard today. Rethink Food looks forward to continuing our dialogue with the Council and Administration on reducing food waste across city agencies. Through this legislation, New York City can take a significant step toward empowering its agencies to become vital partners in our shared mission of reducing food waste and eliminating food insecurity. Thank you for considering this crucial legislation.



SIERRA
CLUB

FOUNDED 1892

www.nyc.sierraclub.org

November 19, 2024

MEMO: Sierra Club Support for Intro 696, 698 and 781.

The Sierra Club is a national grassroots environmental advocacy group with a membership of 54,000 statewide and 15,000 in New York City.

The Sierra Club supports the goals of Intro 696 that requires the NYC Department of Sanitation to establish at least one organic waste composting facility in each borough, to engage the community, consider environmental justice factors and consult the composting facility siting task force. These values of inclusivity and circularity of recycling are at the core of the Club's environmental platform.

The Sierra Club's position is that composting should be the priority with the City establishing a range of opportunities from small to large composting facilities. Composting is an environmentally friendly process.

The Club also supports introductions Intro 698 and Intro 781 all introduced by Council member Sandy Nurse.

The Sierra Club calls for the restoration of budget cuts to the composting programs of not-for-profit organizations and the Brooklyn Botanic Garden.

Given the scale of the City's waste it is not surprising that it has turned to anaerobic digesters as a way to address not only the amount of waste but also the promise of creating methane as a source of fuel energy. However, the process is unreliable. And the Sierra Club finds this promise a form of greenwashing.

The Sierra Club opposes using any end-product of anaerobic digesting as a "fertilizer." The City should not ship anaerobic sludge outside the City for agricultural uses or use the sludge in NYC parks or other places where it poses a human health threat. New York City's sewage contains any number of toxins and contaminants and should not be used in any way in parks, playgrounds or agricultural land since this activity is dangerous for the public health.



**Testimony on behalf of the Manhattan, Brooklyn, Queens, and Bronx Solid Waste
Advisory Boards**

before the New York City Council Committee on Sanitation and Solid Waste
Management

November 20, 2024

Testimony on Intro 57 - Penalties for failure to store waste in a satisfactory manner

The Solid Waste Advisory Boards of Manhattan, Brooklyn, Queens, and the Bronx oppose Intro-57, which would allow the Department of Sanitation (DSNY) to issue fines up to \$3,500 to large buildings that fail to store waste in “a satisfactory manner” or place their waste on the sidewalk before the designated set out time.

We believe that DSNY has a limited amount of enforcement capital before New Yorkers become fed up. We would like DSNY to use this enforcement capital on issues of substance, rather than aesthetics. DSNY should reserve hefty fines for buildings that illegally dispose of hazardous waste and electronics rather than buildings that put out waste at 7 pm instead of 8 pm. Further, we would like to see DSNY and New Yorkers take separating out organics and recyclables seriously, which will help move our city’s diversion rate from 19% to its potential 75%, based on the [2023 NYC Waste Characterization study](#). We strongly believe that DSNY should reserve its fining power for efforts that help divert waste from landfills and incinerators.

Testimony on Resolution 284 - Compost at CUNY and SUNY

The Solid Waste Advisory Boards of Manhattan, Brooklyn, Queens, and the Bronx strongly support the intent of Resolution 284 to establish organics collection and composting programs at institutions that are part of the State University of New York system and the City University of New York system. However, we do not endorse the Resolution as introduced and we do not endorse Senate Bill 5713 because it includes sending organics to “waste to energy” facilities. The City Council Resolution should include a strong recommendation that the Senate bill be modified to exclude sending organics to “waste to energy” and instead prioritize composting.

Burning Waste harms both people and the planet, creating additional methane and asthma-inducing pollution that contributes to environmental injustice and climate change. Further, Burning Waste is not included as a Renewable Energy source in the state's RAPID ACT



(see [the DEC's October 2, 2024 ENB notice](#) and [related documents](#)), or in older NYS law. In addition, Governor Hochul's Executive Order 22, Leading by Example, directs state agencies—including SUNY and CUNY—to develop a sustainability and decarbonization program. Source separating and composting organics—which also is explicitly included in the Senate bill—moves the state and the city toward fulfillment of the Governor's Executive Order, the city's Zero Waste laws, and the state's Climate Leadership and Community Protection Act.

Testimony on Intro 498 - Requiring DSNY to collect organics from community gardens

The Solid Waste Advisory Boards of Manhattan, Brooklyn, Queens, and the Bronx support Intro 498, with a modification that prioritizes directing these organics to local compost processing sites first and setting up a system to facilitate that. Intro 498 has the objective of allowing community gardens to support their communities with an organics collection point at the garden and provides DSNY's hauling support to community gardens to facilitate this objective.

However, DSNY should not be in competition for organics with local compost processing sites, such as the Botanical Gardens. Instead a system should be created to prioritize local compost processing, and to reorganize and rebalance excess compostables and send them to community compost processing sites – those that have been funded and those that are being established or expanded – that have excess capacity. For example, Queens Botanical Garden has the capacity to process an additional ton of organics per week.

Intro 498 should be further modified to expand the funding for local composting infrastructure throughout all five boroughs, working towards the ultimate goal of achieving 100% composting of food scraps throughout New York City. Currently diversion rates for organics source separation from other Municipal Solid Waste is hovering around 4%. There is time for infrastructure to be built out as participation increases through a program of focused education paired with enforcement that is targeted to increase participation.

We call for the prioritization of local compost processing because it is the highest and best use of valuable food scraps because it minimizes toxics and greenhouse gasses, and sequesters carbon today, as our world is already blowing through Climate Change tipping points and experiencing costly impacts. Local compost processing also creates beneficial high quality compost for use in the city's parks, gardens, forests, tree pits, rain gardens, and yards today.

Testimony on Intro 698 - Clarifying the definition of organic waste drop-off site

The Solid Waste Advisory Boards of Manhattan, Brooklyn, Queens, and the Bronx support Intro 698's goal of directing organics to local composting sites. However, we request two modifications to the proposed bill.



First, the bill should allow standalone receptacles that are used for food scrap drop-off sites—whether staffed or unstaffed, and managed by a community or a non-profit—to count toward the minimum number of drop-off sites required in each Borough by Local Law 89 of 2023. While we recognize that staffed drop-off sites provide educational opportunities, they can be costly. Community or non-profit-managed sites should be permitted to establish drop-off locations based on their available resources and program needs.

Second, the bill should explicitly prohibit DSNY’s Orange Bins or successor bins from counting toward the minimum number of drop-off sites in each Borough as outlined by Local Law 89 of 2023. The intent of Local Law 89 of 2023 is to provide New Yorkers the opportunity to put their food scraps to the highest and best use—composting.

Testimony on Intro 781 - Organic waste recycling by city agencies

The four Solid Waste Advisory Boards support the intent of Section 16-307 of the New York City Recycling Law and the proposed amendments in Intro 781 to include “organic waste” among the items required to be source-separated or separated post-collection. Leading by example is essential for inspiring behavioral change. However, expanding a Local Law that is not fully enforced is a misguided effort.

Before the Council moves forward with including “organic waste” as a recyclable item, it is crucial to ensure Section 16-307 of the New York City Recycling Law is being implemented effectively by all relevant agencies. This includes auditing the annual reporting from all agencies receiving DSNY collection services as required by Local Law 36 of 2010, which requires city agencies to create a Waste Prevention, Reuse and Recycling Plan, assign an agency-wide Sustainability Coordinator, and report on their progress annually, and ensure city agencies located in buildings utilizing private carter collection are availing themselves of all opportunities to recycle.

When the Council moves forward with amending the requirements for city agencies in the New York Recycling Law, we recommend the following enhancements:

1. **Broaden the Scope of Section 16-307 of the NYC Recycling Law.** Require all buildings occupied by city agencies to provide recycling provisions, including for “organic waste,” and submit to reporting without exceptions. This will help close loopholes related to non-city-owned buildings,¹ which are increasingly part of NYC’s government office

¹ Local Law 36 stated that the requirement to source separate or post-collection separate applies to “all offices and buildings occupied by agencies that receive collection service from the department and, to the extent practicable, in those that receive private carter collection.”



space. The Commercial Recycling Law already requires all non-city-owned office buildings to provision for recycling and, thus, eliminates the need for carve-outs for agencies occupying non-city owned office space.

2. **Strongly Encourage the Use of Recycling Infrastructure among city agency staff.** Expand the focus of Section 16-307 beyond just providing recycling infrastructure by also incentivizing and requiring city employees to actively use it. Additionally, require agencies to report annually on employee recycling compliance.
3. **Create a Culture of Recycling:** Include the requirement for agencies to provide staff with education and training programs on how to separate recyclables and on the importance of recycling.

By leading by example, city agencies can play an instrumental role in fostering a culture of recycling among New York City residents. The suggestions we are making today will help ensure that agency recycling efforts are effective and truly lead to meaningful change in our waste management practices.

Testimony on Intro 949 - Provision of sufficient receptacles for the storage of solid waste

The Solid Waste Advisory Boards of Manhattan, Brooklyn, Queens, and the Bronx strongly discourage the enactment of Intro 949, which would require managers of buildings with 100 or more units to provide a dumpster for refuse. The proliferation of dumpsters across the city does not serve the city's diversion and source separation goals. Instead, we need to decrease a building's solid waste and increase source separation of organics and recyclables. To improve source separation we need DSNY to conduct sustained public education and to maintain enforcement of a building's separation of recyclables and organic materials.

It is the source separation and containment of organic discards curbside that will most effectively and efficiently move the city toward fulfillment of its Zero Waste laws and the state's Climate Leadership and Community Protection Act, as well as addressing the city's rat problem by eliminating access to their food source, which is why rats go into the Black Bag Trash now.

Furthermore, we don't need larger containers to collect more of a building's solid waste. It is not a good use of scarce public space, and the dumpsters would be a perpetual visual blight at a point where the city is clearing away Covid-era dining sheds and has enacted shed standards.

VILLAGE ALLIANCE

**TESTIMONY BEFORE NYC COUNCIL
COMMITTEES ON SANITATION & CONTRACTS
Oversight Hearing
November 20, 2024**

Chairs Abreu, Won, and Members of the Committees on Sanitation and Contracts,

My name is Scott Hobbs, and I am the Executive Director of the Village Alliance. Since 1993, the Village Alliance has been dedicated to enhancing the quality of life in central Greenwich Village by supporting our commercial corridors, which are predominantly composed of independent small businesses.

We appreciate the opportunity to discuss an issue critically important to us: waste containerization. We share the Department of Sanitation's (DSNY) goal of removing trash bags from our streets to create a cleaner and more welcoming city. For over 30 years, the Village Alliance has been trusted partners to New York City, providing supplemental sanitation services in districts that have been inadequately served due to limited city resources.

However, DSNY has recently discussed with our organization issuing a mandate that BIDs must either haul away or containerize these bags instead of staging them at corners for DSNY collection. Failure to comply would result in fines for "improper disposal" of garbage. While we understand and support the desire to eliminate bags from the streets, this mandate presents operational and financial burdens that are insurmountable for our BID.

Key Challenges We Face:

1. Lack of DSNY Support and Coordination Makes Implementation Unfeasible

Our neighborhood is characterized by narrow sidewalks and streets, making the placement of large waste containers a complex issue requiring careful planning and collaboration. In 2022, we were awarded a grant from DSNY to implement waste containerization in our district. Unfortunately, we were unable to execute this initiative because DSNY and the Department of Transportation (DOT) could not agree on suitable locations for the containers.

As a small nonprofit organization with only two staff members and no legal authority to determine container placements on public sidewalks, we rely on the City to guide us on where containers can go and to provide financial support for

their procurement. Without clear direction and inter-agency coordination, implementing containerization in our district is not feasible.

2. Financial Constraints Make Compliance Impossible

The Village Alliance operates with a modest budget funded by assessments on properties within our district. In the last fiscal year, we invested nearly \$1 million of our \$1.4 million assessment into sanitation and public safety services—nearly 70% of our budget. These funds are primarily contributed by our small, independent businesses.

The additional costs associated with purchasing, siting, and maintaining waste containerization infrastructure are beyond our financial capabilities. Unlike larger BIDs with extensive resources, we cannot absorb these expenses without significant impacts on our existing services.

3. Potential Reduction or Elimination of Supplemental Sanitation Services

If our workers become subject to fines for bagging trash from overflowing corner bins—a service we are not mandated to provide but see as essential—we may be forced to reduce or cease our sanitation efforts. This outcome would be counterproductive, leading to overflowing trash cans along our commercial corridors and undermining the very goal of a cleaner city.

4. Unfunded Mandate Contradicts BID Legislative Framework

BIDs are established to supplement—not replace—city services, as outlined in our district plans and contracts with the Department of Small Business Services. The DSNY’s mandate effectively shifts a core city responsibility onto BIDs without providing the necessary financial support, contradicting the legislative intent behind our establishment.

5. Inequitable Impact on Smaller BIDs

While larger BIDs may have the resources to comply with this mandate, smaller BIDs like the Village Alliance do not. This creates an uneven playing field, disadvantaging neighborhoods like ours that are primarily supported by small businesses. The mandate functions as an undue financial burden on businesses already contributing significantly to sanitation services through the BID assessment.

Our Position and Request:

We remain committed to partnering with DSNY and the City of New York to achieve our shared goal of a cleaner city. However, we urgently need:

- **Financial Support:** Assistance in funding the procurement, siting, and maintenance of waste containerization infrastructure. As a small nonprofit, we lack the funding necessary to comply with these mandates without compromising our existing services.
- **Operational Flexibility:** Recognition of the unique challenges faced by smaller BIDs and the need for tailored solutions that account for our limited resources.
- **Clear Guidance and Coordination:** Improved collaboration between DSNY, DOT, and BIDs to address siting challenges and ensure feasible implementation plans. Without such coordination, the placement of containers on our narrow sidewalks remains a significant obstacle.
- **Postponement of Enforcement:** Until a viable plan is established that accounts for the financial and operational realities of BIDs like ours, enforcement of fines should be postponed to prevent unintended negative consequences.

Without these considerations, the mandate may lead to the reduction or elimination of supplemental sanitation services in our district, which is the opposite of what we all aim to achieve.

The Village Alliance has been a dedicated steward of central Greenwich Village since 1993, working tirelessly to support our small businesses and maintain the charm and appeal of our community. We stand ready to continue this work in partnership with the City but need feasible, supported solutions to do so effectively.

We urge the City to treat BIDs as collaborative partners, not just as additional funding sources. By addressing these challenges together, we can find practical solutions that enhance our neighborhoods without placing undue burdens on small businesses and community organizations.

Thank you for your time and attention to this critical matter.

Committee on Sanitation and Solid Waste Management Jointly with Committee on Contracts
Oversight Hearing 11/20/2024
Comment on
Containerization requirements for BIDs in NYC

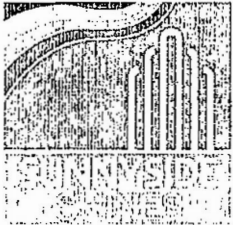
My name is David Brause and I am the President at Brause Realty Inc. as well as the Chairman of the Long Island City Business Improvement District. I have been in the neighborhood for 44 years and have witnessed the tremendous positive impact the current BID has had on our neighborhood specifically regarding their supplemental sanitation services. It has come to our attention that the NYC Department of Sanitation has proposed new rules regarding containerization for Business Improvement Districts across the City that will go into effect in August of 2025. The details of this proposal are deeply concerning to us, as it is passing the burden disproportionately onto BIDs for providing crucial services that supplement city services.

The Long Island City BID, along with the 74 other BIDs across NYC, have operated in close partnership with City of New York to provide much needed supplemental sanitation services, beautification efforts, business support and economic development to highly trafficked commercial corridors. In LIC the core supplemental sanitation services have included; sidewalk and curbside litter collection, power washing to street furniture and sidewalks, bagging and replacing trash bags in corner bins, graffiti removal and winter salt and snow removal. The current BID is undergoing an expansion of services, as there is drastic and noticeable difference specifically in street and sidewalk cleanliness between areas currently serviced by the BID and those that are not. This is to say, the LIC BID provides very important services to our neighborhood that would not be provided otherwise if they were not here.

The mandate assumes that BIDs can carry the burden of containerizing public trash and take on DSNY's role of trash collection and disposal – a city service. While sharing the desire to keep trash bags off the street and mitigating rats along our corridors, we don't agree that BIDs need to pay the price for this to happen. The LIC BID currently collects roughly 44,000 bags of trash per calendar year, maintains 115 trash cans throughout the district and has 7 full time workers providing services 7 days per week. The cost to completely containerize all trash in the district would cost close to an additional \$200,000, over half of the current sanitation budget. As a member of the board who helps decide on the annual budget and services that the BID provides each year, I am aware how much this cost would burden the BID. We would have to cut other programming in order for our small non-profit to afford this unfunded mandate.

The LIC BID has worked in partnership with The Department of Sanitation since the BID's inception in 2005, and we hope to continue to do so. If the City is to mandate containerization within Business Improvement Districts, they must continue working in partnership with individual BIDs to find solutions that work - there is no one size fits all scenario when some BIDs have \$20 million budgets while others have only \$80,000. The simple answer is, if DSNY wants bags completely off the street, they should provide more regular service, or they should provide funding and solutions for BIDs to assist.

On behalf of Brause Realty Inc. and as the Chairman of the Long Island City BID Board, I thank you for your consideration.



Business Improvement District

45-56 43rd Street

P.O. Box 4477

Sunnyside, NY 11104

T: (718) 606-1800

F: (718) 228-5554

www.sunnysideshines.org

Thank you for this opportunity to bring testimony. Thank you to Chair Julie Won of the Contracts Committee and Chair Shawn Abreau of the Sanitation Committee. My name is Dirk McCall de Palomá, and I am the Executive Director of the Sunnyside Shines Business Improvement District in Queens. This is an incredibly important topic and we appreciate the Council for shining a light on the issues surrounding containerization and how it will impact smaller BIDs across the city.

Sunnyside Shines covers 12 blocks (North and South sides) of Queens Boulevard, from 38th Street to 50th Street, and the first six blocks of Greenpoint Avenue, as well as the first block of Roosevelt Avenue. Our assessment is \$360,000 annually – we are not one of the smallest BIDs, but neither are we well financed. We work hard to identify additional funding streams to augment our assessment and allow us to do work to serve our commercial corridors and communities.

Like the majority of BIDs in the city, we contract out our street sanitation work. We have worked with Street Plus since our formation in 2008, and our street team cleaners are very good at sweeping up and at emptying the trash cans along Queens Boulevard and Greenpoint Avenue. We work hard to keep the sidewalks and street bed litter free and prevent our merchants from being fined for trash.

We appreciate the goals of the containerization policy proposed by the NYC Department of Sanitation, but note that there is no mechanism for the city to help fund the purchase of Citibin containers or other storage options, and no proposal on how we would increase the number of our sanitation crew to move bagged trash to other locations. We are not opposed to finding a way to make this work, but we need funding streams that will allow us to implement these plans while continuing our other work. Like many unfunded mandates, the goals are laudatory, but there need to be plans on how we will pay for the additional work.

Thank you for this opportunity to comment.

From: [Eli Greenfield](#)
To: [Testimony](#)
Subject: [EXTERNAL] Opposition to new garbage cans
Date: Wednesday, November 20, 2024 10:27:45 AM

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Good morning,

My name is Elimelech Greenfeild, I live in Far Rockaway. While I understand that there is a need for better garbage cans, residents who have "compliant cans" should not be subject to having to buy new cans as we have spent significant money on our good garbage cans. respectfully please consider having an allowance for residents who have compliant cans.

Respectfully submitted,

Elimelech Greenfield

From: [Josh Knoller](#)
To: [Testimony](#)
Subject: [EXTERNAL] Sharing just as an FYI: Op-Ed | War on trash has unintended casualty, business improvement districts | amNewYork
Date: Wednesday, November 20, 2024 12:14:54 PM

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<https://www.amny.com/opinion/war-on-trash-has-unintended-casualty-business-improvement-districts/>

Opinion

Op-Ed | War on trash has unintended casualty, business improvement districts

**By Wilma Alonso, President & CEO – Fordham Road BID and
Laura Rothrock, President – Long Island City Partnership**

Posted on [November 19, 2024](#)

Fordham Road and Long Island City are two completely different neighborhoods. Fordham is the Bronx's busiest commercial corridor with more than 300 businesses, primarily retail. Long Island City is a multi-use waterfront community including residential, commercial housing, retail and industrial.

But here's where our BIDs have never been more aligned.... The Department of Sanitation's (DSNY) recent mandate to have all BIDs assume responsibility for the containerization of all trash bags in our neighborhoods would have drastic and unforeseen consequences and run counter to the very reason why BIDs were formed in the first place. DSNY has informed BIDs that they will start fining our organizations for public trash that we collect and set out for DSNY to cart to the Sanitation garages. As the City Council hosts a hearing on this policy in the near future, the war on rats may have an unintended consequence... an unintentional declaration of war on BIDs. Here's why:

For more than 40 years, business improvement districts have operated in partnership with the city of New York, providing *supplemental* sanitation services, undertaking neighborhood beautification efforts and promoting economic development through our vibrant businesses. The keyword here is supplemental. The new mandate essentially implies that DSNY is privatizing sanitation services, shifting primary responsibility to us. What a bunch of garbage (sorry, we couldn't resist the pun)! To-date, we have not

received any guidance on how this new policy will be implemented. DSNY, in a city with a \$110 billion operating budget plus a \$100 billion capital budget, has a FY25 budget of \$1.9 billion and has a staggering 10,000+ employees. The majority of BIDs have small staffs and budgets less than \$1 million, which makes the DSNY demand that the BIDs do the agency's job simply outrageous.

That leads to our next point. Our sanitation services consume significant portions of our budgets, not to mention rising operational costs from insurance and inflation. For Fordham Road, it's approximately 33 percent and in Long Island City, it's 44 percent. Our street teams comb the neighborhood, paying special attention to servicing overflowing garbage cans, replacing the liner in the trash bins, and then leaving the bags on the sidewalk for collection. What this new policy mandates is that BIDs will be responsible for getting rid of the bags on the sidewalk, whether it's through private collection or adding more containers, both of which come at considerable cost to our BIDs. On Fordham Road alone last year, 48,000 bags of trash were conveniently placed on the sidewalks for collection by DSNY. In Long Island City, that number was 44,000.

Third, on Fordham Road, the City replaced all of our trash bins with brand new bins. Great in principle but head-scratching in execution because all the new bins are actually smaller and therefore create more bags because they overflow faster. This means the BIDs will also have to work with the City to cite new locations with NYC DOT for large containers, a process that usually takes months and both our neighborhoods are incredibly dense with limited space in the public realm. Fordham's curbside bus lane and Long Island City's very narrow sidewalks and outdoor dining make capacity for containers on the street limited.

Fourth, illegal dumping in our neighborhoods makes compliance with this new policy even more cumbersome and in essence assumes we will be blamed (and fined) for any trash not containerized on the sidewalk. In the Commercial District Needs Assessment Fordham Road BID conducted last year surveying hundreds of businesses, illegal dumping and street cleanliness were in the top three concerns of the BID. DSNY has a history of issuing summonses to business owners on Fordham Road for trash left on the sidewalk when in fact, it was left by a vendor who should not have been on Fordham Road in the first place since it is a vendor-restricted street. While illegal vending is not as much of an issue in Long Island City, we can't control illegal dumping from individuals and should not be fined for those actions.

Don't get us wrong. We share the city's vision of doubling down on the war on trash from other containerization efforts with our residential and commercial stakeholders to the formation of the 'rat pack' to reduce the city's rat population. But this new policy is a slap in the face of a successful 40-year partnership between the city of New York and the 76 hardworking BIDs. It is incumbent upon DSNY to engage transparently with and in partnership with us to mitigate the concerns that would have

devastating economic consequences. If DSNY wants bags off the street, they should add additional service. If they want us to maintain containers for public trash, they should provide the funding for us to do so. BIDs are nimble and creative partners who know how to get things done. However, we will not do the job for DSNY.

**Testimony to the NYC Committee on Sanitation and Solid Waste Management
Support for NYC Council Bill 0299-2024**

TO: Chairperson Shaun Abreu and members of the Committee on Sanitation and Solid Waste Management

FROM: Leslie Nunez, MPH

DATE: October 30, 2024

My name is Leslie Nunez, and I am a resident of Bay Ridge, Brooklyn. As a constituent of council District 47 and strong supporter of food justice initiatives, I am writing to express my support for NYC Council Bill 0299-2024. This legislation represents an essential step towards addressing two interconnected issues facing our city: food insecurity and food waste.

In New York City, 1.3 million residents, including 1 in 4 children, struggle with food insecurity. Rising living costs have also left many families unable to afford basic necessities, leading to a 75% increase in monthly visits to food pantries and soup kitchens when compared to pre-pandemic levels. At the same time, our city disposes of approximately 650,000 tons of food waste annually, much of which is still considered edible. This is a missed opportunity to redirect valuable food resources to those in need, which Bill 0299-2024 aims to address. By reducing civil penalties for food service establishments that donate leftover food, this policy would help reduce waste while strengthening food assistance efforts for vulnerable communities. It would also ease the financial burden of certain businesses by providing an incentive to contribute to charitable causes, allowing them to avoid fines for minor health code violations.

I recommend expanding awareness of this bill among food service businesses and ensuring that the process for donating surplus food is streamlined and accessible. Furthermore, tracking the impact of this policy, such as the amount of food diverted and the number of businesses participating, would allow for continued refinement. While current laws focus on waste disposal, Bill 0299-2024 creates a unique incentive for restaurants and businesses to be proactive in combating food insecurity.

Supporting evidence from other cities with similar initiatives shows the positive environmental and social benefits of food donation programs. Addressing food insecurity through innovative measures like this can also alleviate pressure on local food pantries, which are currently overwhelmed with demand. This bill strikes a balance between reducing fines for businesses and providing crucial support to families in need.

In closing, I strongly urge the Committee to continue to support NYC Council Bill 0299-2024. This legislation is a win-win for businesses, food insecurity programs, and our city's environmental sustainability efforts. Thank you for considering my testimony and for your commitment to addressing these pressing issues.

Respectfully,
Leslie Nunez, MPH

From: [Magdamari Marcano](#)
To: [Testimony](#)
Subject: [EXTERNAL] Amended copy of Testimony for Sanitation Hearing on 11/20/2024
Date: Wednesday, November 20, 2024 10:42:38 AM

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My name is Magdamari Marcano, residing in the Bronx Council District 15 for 56 years. I would like to thank you for the opportunity to speak at this hearing today.

I would like to testify on the following three(3) points: I

A. The validity of the sole source rfp the Department of Sanitation has used to force the homeowners to purchase the trash receptacles that will be used to combat the rat situation in all communities. I did some research on the company selected to provide the trash cans. Below you will find information on the owners of Otto Environmental Systems and its owners(foreign).

The perspective of homeowners on my block is that a contract of this magnitude should have been diversified. We , homeowners, would appreciate to be respected, as you do businesses and other entities throughout the city. Secondly, where are the jobs for New Yorkers? since the company selected to furnish trash cans is located in Charlotte. NC and the owners of the company are Canadian and Bahamian.

Why aren't the homeowners in NYC provided with more than one vendor? A list of vendors would be more suitable. Especially, when we're feeling like NYC is converting itself into a dictatorship, when analyzing this specific matter.

B. The NYC Department of Sanitation has advised us to file a police report if the can is stolen while sitting outside the property. The NYPD doe not currently have adequate manpower to address more serious crimes. How do you expect them to take homeowners seriously? Did the Department of Sanitation sit with the NYPD (as a partner) and alert them of the additional duties they are expected to assume? I've already been victimized with a stolen can.

C. I am not opposed to containerization to combat the rat epidemic in NYC. On the contrary, I am avid fan of it. But, the focus should have been on the food sources, RESTAURANTS and other food establishments, the corner trash cans and large buildings that throw their cardboard packaging and compacted food bags on the sidewalks of our streets.

I love the idea of composting, but I literally, live next door to the largest compost bin in the Bronx, a McDonalds trash dumpster. Why isn't Sanitation addressing those types of violators? Are we afraid they would leave? If large fast food establishments were to leave the Bronx, we would be a lot healthier for it and NYC a lot cleaner.

Homeowners with less than nine units are disappearing due to the building explosion that is taking place in The Bronx. Yet, NYC continues to suck the money and life out of us all, especially, the poorest Community Districts of the entire country. NYC Department of Sanitation and the Mayor's Office made itself responsible for the rat epidemic when they replaced the metal trash bins with plastic bags. I firmly believe that those responsible for the problem pay for the solution

INFORMATION REGARDING OTTO ENVIRONMENTAL SYSTEMS, MICHAEL COSTELLO,
PRESIDENT

**Duramax Holdings LLC, dba Otto Environmental Systems, 12700 General Dr, Charlotte, NC
28273**

Who is the owner of Otto Environmental Systems?

Callidus Capital Corporation

Callidus Capital Corporation, the owner of Otto, appointed Costello to strategically align with the customers it serves in the waste and recycling industry as it continues to grow its market share. Aug 2, 2019

According to Wikipedia, Catalyst Capital

Group Inc. is the majority shareholder of

Callidus Capital Corp. Catalyst owns almost

60% of Callidus and is a primary source a

funding for the company. o

Here's some more information about

Callidus Capital Corp.:

Sam Fleiser founded Callidus Capital Corp. in 2004.

Newton Glassman took over Callidus in 2011 with the goal of making the company public.

In April 2014, Catalyst took Callidus public at \$14 a share.

In 2019, Braslyn Ltd. bought the minority

shares not owned by Catalyst. @

Newton Glassman -

Wikipedia

Alternative lender Callidus Capital

Callidus

Braslyn Increases Ownership in Callidus Capital Corporation

News provided by

[Braslyn Ltd.](#)

Mar 29, 2017, 16:40 ET

NASSAU, THE BAHAMAS, March 29, 2017 /CNW/ - Braslyn Ltd. ("Braslyn") has acquired, through the facilities of the Toronto Stock Exchange, ownership and control over 129,800 common shares of Callidus Capital Corporation ("Callidus"), representing approximately 0.26% of the outstanding common shares of Callidus. Together with the 6,371,586 common shares of Callidus previously owned by Braslyn, Braslyn now owns and controls a total of 6,501,386 common shares of Callidus, or approximately 12.85% of the issued and outstanding common shares of Callidus. Braslyn has acquired the common shares for investment purposes and may, from time to time, acquire additional common shares of Callidus, dispose of some or all of the common shares of Callidus, or continue to hold the common shares of

Callidus.

SOURCE Braslyn Ltd.

Thank you.

**DSNY Council Hearing
Committee Room, City Hall
Wednesday, November 20, 2024
10:00 a.m.**

Good morning. My name Matt Malloy. I am a sanitation supervisor for the Garment District Alliance, a business improvement district in midtown Manhattan.

The Garment District Alliance supports containerized garbage. However, there are aspects of Intro 57 to which we strenuously object and we urge you to not support this bill.

The Garment District is a non-profit 501C3 that provides *supplemental* neighborhood sanitation services to the city's existing municipal DSNY service. It is clearly stated in our agreement with the city that the city cannot reduce service in a BID district unless that service is also being reduced citywide. In other words, a BID cannot be penalized for assisting the city with their obligation to clean the streets and remove publicly generated waste from public trash receptacles.

The city is required to provide public waste receptacles on our streets, not BIDs. The Garment District will not privately pay for standard NYC containers required by DSNY. A BID may opt, at their own cost, to provide non-standard waste receptacles but we cannot pay for City property or face penalties for not providing them.

Similarly, the Garment District should not be forced to undertake responsibility for mapping locations of the proposed containers. These are city streets and DSNY must step up and manage them, including the siting of waste receptacles.

The Garment District also strenuously objects to the proposal that we could be fined for leaving bags of garbage on corners for DSNY collection. The contents of the bags

that GDA places on corners are publicly generated street litter that GDA sweeps up to improve our neighborhood.

BIDs are voluntarily formed organizations which help their neighborhoods have clean and well-maintained environments in cooperation with, and supplemental to, government agencies. They were not formed, as this bill intends, to replace or take on the responsibility of government. This bill violates our agreement with the City and undermines the goodwill between the public and private sector.

We recommend that the council send this bill back to DSNY to work with community groups to develop a better containerization plan. Thank you.

Good morning to the Chair and Members of the NYC Council Sanitation Committee. My name is Noah Sheroff. I serve as the executive director of the Bayside Village Business Improvement District in northeast Queens. I would like to thank you for the opportunity to testify today. I appreciate your interest in my input. In addition, I would like to thank Councilmember Paladino for her continued support and advocacy of the Bayside Village Business Improvement District. I would like to provide some insight into a "small BID". Our situation applies to several BIDs across the five boroughs.

The Bayside Village Business Improvement District is a small district covering Bell Blvd in Bayside, Queens from 35th Avenue to Northern Blvd and 41st Ave just off of Bell Blvd – about 10 blocks of commercial, residential, office and mixed use properties. Currently, our assessment is \$230,000 per year. Of that, approximately \$66,000 per year is paid to our contracted supplemental service provider Streetsplus. The BID receives grants but they are not guaranteed year to year and are often, if not always, reimbursement based. We pay money, generally received from the assessment and get that money back. The BID contracts one worker, a rock star named Yow, who works six days per week. According to the September monthly snapshot of the service providers work, 175 service hours were clocked and 501 garbage bags were used. Yow currently places the full bags next to each receptacle for DSNY pickup. The new mandate to containerize bags will not just create a greater burden for Yow but the BID as well: plain litter pickup services cost 28% of the assessment. Adding additional services like hauling all the bags to a central location or carting to a sanitation garage, will further squeeze the budget and make it extraordinarily difficult to run programs such as our very popular events.

Another matter that I would like to bring to your attention is that the practice of improper disposal from the general public still occurs and will continue to occur and neither the BID nor its members should suffer the consequences of a summons. Businesses and owners have received summonses due to improper disposal by the general public. This has become such a concern that one of the property owners, in order to prepare for the containerization of trash for buildings with one to nine units, chained the container to the building and equipped it with two additional chains and locks to secure it.

While I can appreciate getting bags off the streets, a huge concern is that the BID and local businesses and property owners will be fined for improper disposal by the general public. Again, the BID doesn't have the financial capacity to purchase costly containers, hire a carting company or spend their resources paying fines by the City for the public's trash.

Thank you, again, for your time and consideration.

Committee on Sanitation and Solid Waste Management Jointly with Committee on Contracts
Oversight Hearing 11/20/2024
Comment on Containerization requirements for BIDs in NYC

My name is Paula Kirby and I am a Board Member of the Long Island City Business Improvement District. I grew up visiting my grandfather, mother, aunt, and uncle at our family business, Plaxall, Inc., located at 5-46 46th Avenue in LIC, and I joined Plaxall as Managing Director in 2014. I was a co-chair of the BID expansion that was approved in 2017 and have witnessed the tremendous positive impact the current BID has had on our neighborhood specifically regarding their supplemental sanitation services. It has come to our attention that the NYC Department of Sanitation has proposed new rules regarding containerization for Business Improvement Districts across the City that will go into effect in August of 2025. The details of this proposal are deeply concerning to us, as it is passing the burden disproportionately onto BIDs for providing crucial services that supplement city services.

The Long Island City BID, along with the 74 other BIDs across NYC, have operated in close partnership with City of New York to provide much needed supplemental sanitation services, beautification efforts, business support and economic development to highly trafficked commercial corridors. In LIC the core supplemental sanitation services have included; sidewalk and curbside litter collection, power washing to street furniture and sidewalks, bagging and replacing trash bags in corner bins, graffiti removal and winter salt and snow removal. The current BID is undergoing an expansion of services, as there is drastic and noticeable difference specifically in street and sidewalk cleanliness between areas currently serviced by the BID and those that are not. This is to say, the LIC BID provides very important services to our neighborhood that would not be provided otherwise if they were not here.

The mandate assumes that BIDs can carry the burden of containerizing public trash and take on DSNY's role of trash collection and disposal – a city service. While sharing the desire to keep trash bags off the street and mitigating rats along our corridors, we don't agree that BIDs should pay the price for this to happen. The LIC BID currently collects roughly 44,000 bags of trash per calendar year, maintains 115 trash cans throughout the district and has 7 full time workers providing services 7 days per week. The cost to completely containerize all trash in the district would cost close to an additional \$200,000, over half of the current sanitation budget. As a member of the board who helps decide on the annual budget and services that the BID provides each year, I am aware how much this cost would burden the BID. We would have to cut other programming in order for our small non-profit to afford this unfunded mandate.

The LIC BID has worked in partnership with The Department of Sanitation since the BID's inception in 2005, and we hope to continue to do so. If the City is to mandate containerization within Business Improvement Districts, they must continue working in partnership with individual BIDs to find solutions that work - there is no one size fits all scenario when some BIDs have \$20 million budgets while others have only \$80,000. The simple answer is, if DSNY wants bags completely off the street, they should provide more regular service, or they should provide funding and solutions for BIDs to assist.

On behalf of Plaxall and as a member of the Long Island City BID Board, I thank you for your consideration.

Dear City Council Members:

Mayor Adams and Sanitation Commissioner Jessica Tisch are taking advantage of NYC residents of 1-9 family dwellings using them as cash-cows for the benefit of a company of their choice. They are imposing an unreasonable requirement under the penalty of repeated fines by forcing us to purchase trash bins from their chosen dealer OTTO. This is abusive and inconsiderate, and an added burden to many cash strapped homeowners and senior citizens.

In the past when the City implemented plastic and glass recycling it provided the blue bins. When it began composting food waste we once again received the brown bins. Now this Mayor is targeting homeowners for the benefit of this evidently well-connected company and their associates. This is discriminatory and burdensome for a large sector of NYC's population.

With nearly four million housing units in the city, it is probable that about 50% will fall under the 1-9 family category affected by this unfair law. The total cost at \$54.60 per bin will add up to more than 110 million dollars for the benefit of OTTO, at the onset. But we will not only have to purchase new containers now, we will have to purchase them as often as necessary thereafter, when the bin is damaged or stolen, or face a hefty fine.

Adams and Tisch are also having the temerity to tell homeowners to file a police report for any stolen bins. This is beyond offensive. Will searching for trash bin thieves become a top priority for the NYPD over rapes, murders, and assaults?

Large residential buildings will receive as many commercial sized bins as needed free of charge. The City has already contracted with the Spanish company Contour by leasing the first 1,500 large scale bins that will be distributed starting next year in Harlem at a cost of 7 million dollars, with a planned expansion to cover all large buildings throughout NYC. What sets those residents apart from 1-9 family dwellers?

Eventually all large residential buildings will receive the leased large bins paid for with taxpayer funds. Therefore, we, small homeowners, are paying twice, 1st as taxpayers for the leasing of the large containers for buildings we do not reside in, and 2nd with forced direct purchases for individual bins under penalty of repeated fines. This is discriminatory as well as suspect - since this deal is coming in under the radar. By forcing us to purchase them with our personal funds, not disbursed from NYC funds, OTTO and associates do not fall under the purview of the City's Comptroller's Office.

We all understand there is a benefit to removing plastic bags from sidewalks, but to single us out for OTTO's benefit is unjust. The cost of these bins should be shouldered by the City for ALL its citizens not only for those chosen by the Mayor and his Sanitation Commissioner.

Please don't allow this unjust burden to be arbitrarily imposed on your constituents. Thank you!

Very truly yours,

Rebeca Pagan-Rodriguez

**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: Tim Lavagnin

Address: 88 Essex Street

I represent: Lower East Side BID & BID Assn.

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: Maddie Baker

Address: ~~40~~

I represent: 34th Street Partnership BID

Address: 5 Bryant Park, Suite 2400, New York, NY 10018

**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: 1/12/24

(PLEASE PRINT)

Name: Christopher Leon Johnson

Address: _____

I represent: Sij

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 498⁰²⁸⁴ Res. No. _____

in favor in opposition

Date: 11/20/24

(PLEASE PRINT)

Name: Nike Cross

Address: _____

I represent: New York Lawyers for the Public Interest

Address: 151 W. 30th St # 11, 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: 11-20-24

(PLEASE PRINT)

Name: Jim Martin

Address: _____

I represent: ACE (Association of Community Employment Programs for the Homeless)

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: 11/20/2024

(PLEASE PRINT)

Name: NOAH SHEROFF

Address: _____

I represent: ROCKAWAY PARK, NY 11694
BAYSIDE VILLAGE BID

Address: 213-33 39th Ave #310, BAYSIDE, NY 11361

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: 11/20/2021

(PLEASE PRINT)

Name: NOAH SHEROFF

Address: _____

I represent: ROCKAWAY PARK, NY 11694
BAYSIDE VILLAGE BID

Address: 213-33 #310, 39th Ave, Bayside, NY 11361

**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: 11/20/21

(PLEASE PRINT)

Name: There Mark

Address: _____

I represent: Pitkin Avenue BID

Address: 1572 Pitkin Avenue

**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: Christine Tate - Roman

Address: _____

I represent: Lower East Side Ecology Center

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: _____

(PLEASE PRINT)

Name: Scott Hobbs

Address: [redacted] 88th St, NY, NY

I represent: Village Alliance

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 2744 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: SARA PENENBERG

Address: _____

I represent: 32B)

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1444 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: MATI JOZWIAK, CEO

Address: _____

I represent: RETHINK FOOD

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: 11/20/24

(PLEASE PRINT)

Name: Jeffrey LeFrancis

Address: _____

I represent: Manhattan District BID

Address: 32 Chambers St.

**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: 11/20/2024

(PLEASE PRINT)

Name: MAGDAMARY MARCANO

Address: _____ Bx NY 10460

I represent: _____

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: DIRK McCall de Palom

Address: _____

I represent: Sunnyside Shines BID

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: 11/20/24

(PLEASE PRINT)

Name: Mark Dicus

Address: _____

I represent: Fifth Avenue Association

Address: 16. E. 52, 3rd Fl, NY, NY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. T2024-2744 Res. No. Intro 949

in favor in opposition

Date: 11/20/24

(PLEASE PRINT)

Name: Rebecca Poole

Address: [Redacted] Terrace Bronx

I represent: Council of New York Cooperatives

Address: 850 7th Avenue, NYC Condominium

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 2024 Res. No. _____

in favor in opposition N/A

Date: 11/20/24

(PLEASE PRINT)

Name: Corey Kunz

Address: [Redacted]

I represent: Hudson Square Bid

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. oversight Res. No. _____

in favor in opposition

Date: 11/20/24

(PLEASE PRINT)

Name: Laura Rothrock

Address: Queens Plaza North

I represent: NYC BID association

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. oversight Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: DAVID Goldberg

Address: _____

I represent: Streetplus

Address: 157 Conant St Bklyn NY 11211

**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: 11/20/24

(PLEASE PRINT)

Name: WENDY BRAWER

Address: _____

I represent: myself

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: Bonnie Webber

Address: _____

I represent: Sierra Club

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: 11/20/2024

(PLEASE PRINT)

Name: Samantha MacBride, Ph.D.

Address: _____ NYC 10010

I represent: self

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: 11/20/2024

(PLEASE PRINT)

Name: MATT MALLOY

Address: _____

I represent: GARMENT DISTRICT ALLIANCE

Address: 209 W 38ST NY NY

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: _____

(PLEASE PRINT)

Name: Jaqueline Logan

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: Joe Antonelli

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: Jessica Tisch

Address: _____

I represent: DSNY

Address: _____

 Please complete this card and return to the Sergeant-at-Arms 