

In Re Public Hearing NYC - Department of Sanitation
June 10, 2024

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PUBLIC HEARING
NYC Department of Sanitation
Public Hearing

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June 10, 2024
9:31 a.m.

PUBLIC HEARING
Held Virtually via Microsoft Teams

Recorded by:
Stephanie O'Keefe, Court Reporter

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MS. LIGUORI: Good morning and welcome. My name is Madelynn Liguori. I am Senior Counsel in the Bureau of Legal Affairs for the Department of Sanitation. Thank you for attending this public hearing this morning.

DSNY is conducting this remote hearing in accordance with the requirements of the City Administrative Procedure Act. The purpose of this hearing is to receive comments from the public on DSNY's proposed rule relating to commercial waste zone records and reporting requirements.

This rule was published by DSNY in the City Record on May 6, 2024, with a scheduled hearing date of today, June 10, 2024. Additionally, DSNY emailed copies of the rule to all New York City local elected officials, the City's fifty-nine community boards, media and interested parties, and published the proposed rule on its website.

In 2019, New York City enacted Local Law 199 requiring the establishment of a new program for the collection of commercial waste. The program, known as the commercial waste

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2 zones program, is a collection system designed
3 to provide high-quality, low-cost service to
4 New York City businesses while advancing the
5 City's zero waste and sustainability goals by
6 limiting the number of private carters that can
7 operate in each zone. Its implementation is
8 currently underway. Under Local Law 199,
9 codified in Title 16-B of the New York City
10 Administrative Code, the Sanitation
11 Commissioner has divided the geographic area of
12 New York City into 20 commercial waste zones.
13 Pursuant to a request for proposals, three
14 private carters have been selected by the
15 Department to serve customers within each
16 commercial waste zone and five carters have
17 been selected to provide containerized
18 commercial waste collection services citywide.
19 The selected carters will be referred to as
20 "Awardees."

21 The request for proposals process
22 identified the carters that can provide high
23 quality service at competitive prices. The
24 resulting contracts with the Awardees include
25 standards for pricing, customer service,

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safety, environmental health, and requirements to promote the City's commitment to recycling and sustainability.

Local Law 199 contains certain records and reporting requirements, but it also requires Awardees to comply with any rules promulgated by the Department pertaining to the reporting of information about the collection of commercial waste. These requirements will ensure that Awardees provide the information that the Department deems necessary to further the goals of the law.

Examples of new reporting requirements include reports on waste generation estimates, rates charged to customers, warnings or violations issued, workplace injuries and accidents and training records.

A court reporter is present today and will record the hearing. You may present an oral statement or submit written comments concerning the proposed rule. We have been accepting written comments on the proposed rule since it was published. Today is the deadline for submission of written comments. Such comments

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may be emailed directly to
nycrules@dshny.nyc.gov by 5PM today.

(Unintelligible speaking by a
participant.)

If everyone can please mute themselves.
We have been accepting written comments on the
proposed rule since it was published. Today is
the deadline for submission of written
comments. Such comments may be emailed
directly to nycrules@dshny.nyc.gov by 5PM today.

DSNY will make available a copy of all
written comments received through today,
together with the hearing transcript, for
viewing on its website within the next few
weeks.

DSNY will carefully consider all the
comments it receives today at the hearing and
all written comments it receives.

I will begin calling those of you who wish
to speak this morning in the order in which you
have signed up to testify. While the notice
asked that persons wishing to testify sign up
in advance of this hearing, anyone wishing to
testify at this time may do so by indicating in

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the chat area that you wish to testify by indicating your name and affiliation, if any. When you speak, please say your name and affiliation, and speak slowly and clearly so that the court reporter can understand and accurately record your statement. We also ask that you limit your statement to three minutes.

I would now like to call on Council Member Shaun Abreu to testify. Council Member.

MR. ABREU: Good morning. Can you hear me?

MS. LIGUORI: Yes, loud and clear. Thank you.

MR. ABREU: Good morning, everyone. I want to thank you for the opportunity to testify at today's rule-making hearing. My name is Shaun Abreu, and I chair the Council's committee on sanitation and solid waste management.

Effective implementation of the Commercial Waste Zones Law is a critical priority for the Council, as is ensuring that businesses are complying with commercial containerization rules, given the importance of ensuring that

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materials are recycled and that commercial establishments are containerizing their waste.

I believe that private carters should be obligated to notify Department of Sanitation when they observe such violations as quickly as possible, ideally within a few days. This would allow DSNY to assist business owners and remedy any issues or misunderstandings that businesses may have, and also apply enforcement mechanisms quickly and effectively when necessary. Cleaner streets benefit us all, and it's our shared responsibility that we get this right.

Thank you so much for the opportunity to testify.

MS. LIGUORI: Thank you so much, Council Member, we really appreciate it.

MR. ABREU: Of course.

MS. LIGUORI: I would now like to call Megan Carr for the New York Lawyers for the Public Interest. Megan.

MS. CARR: Good morning. Good morning. My name is Megan Carr, I am an environmental justice legal fellow at New York Lawyers for

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the Public Interest, known as NYLPI.

The manner in which DSNY handles, processes, and moves waste across the City can serve as a huge asset in the fight for environmental justice or present an enormous barrier. That's why NYLPI, as part of the Transform, Don't Trash Coalition, has been a strong supporter of the Commercial Waste Zones Law, Local Law 199, since its inception. Five years after its passage, we are still calling on a robust, transparent, equitable, and expedient implementation.

We believe that DSNY's proposed rule changes accurately reflect the intention of the law and we support their adoption.

One of the major motivations behind the Commercial Waste Zones Law was to reduce vehicle miles traveled, thus drastically reducing vehicle emissions from the current operating model in which haulers routinely drive over a hundred miles a night, crisscrossing the City and needlessly polluting the air. This most effects New York's environmental justice communities who already

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live in areas with worse air quality,
exacerbated by diesel truck pollution.

With this purpose in mind, we are pleased to see the addition of odometer readings to Section 2056 on the list of information that must be transmitted via the telematic system on the commercial waste vehicles. We hope that the reporting and tracking of that data will be used by DSNY to ensure that Local Law 199 is achieving its intended and expected results when it comes to reducing VMT by fifty percent.

The chaotic, free-for-all nature of the City's commercial waste zones industry -- commercial waste industry, has made it difficult to obtain accurate data on the industry's effects, including waste generation estimates, safety issues and rates charged to customers, among other things. And for these reasons, we are pleased to see many additions to the recordkeeping requirements under subchapter E 2060, which require recordkeeping on all of these matters and more.

The full implementation of Local Law 199 will serve to greatly improve the environmental

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footprint of the industry, as well as safety for its many tireless workers. Continually gathering, reporting, and amassing data on other areas, such as waste generation, sets up DSNY to continually improve the commercial waste handling system in other ways and commutes will for advocates seeking to reduce waste more broadly. We are thus very supportive of these recordkeeping requirements.

As mentioned above, improving worker safety in this dangerous industry was a priority in the fight for this law and must remain a priority in its implementation. For those reasons, we're happy to see the training requirements that are added, as well as the addition of annual training requirements, which can help ensure that workers are properly prepared for their role, increasing both their safety and the safety of pedestrians and other drivers across the City.

We do recommend amending Section 2062 A15, which provides haulers with five business days to notify DSNY when there is a breach of an Awardee subcontractor. While there are likely

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many circumstances where five business days is an acceptable amount of time, we urge DSNY to require a shorter period of time before notification, whenever the breach is related to workplace safety or labor practices. Where safety is an issue, waiting five business days is neither necessary nor acceptable.

In sum, we are supportive of these rules and eager to see DSNY fully implement the Commercial Waste Zones Law. This will create momentous benefits for all New Yorkers, producing safer streets, cleaner air, and better conditions for the thousands of workers in the commercial waste business

Savor one recommended amendment, we strongly urge the adoption and reliable enforcement of these rules.

Thank you for your time and the opportunity to testify.

MS. LIGUORI: Thank you very much, Ms. Carr.

I would now like to call Lacey Taubert, from the Brooklyn Borough President's Office. Lacey.

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MS. TAUBERT: Hello, good morning. Thank you for holding this hearing today. I'm representing Brooklyn Borough President Antonio Ranoso, who was the prime sponsor of the 2019 legislation that created the Commercial Waste Zones Program when he was chair of the City Council Sanitation Committee.

He attended last week's City Council Oversight Hearing and made his disappointment with DSNY's roll out of the plan clear.

Specifically, he made three points. One, the DSNY putting a 40 percent rate on pricing in the RFP evaluation, undermined the spirit of the law, which was specifically and thoughtfully designed to address safety and environmental justice.

Two, it is unacceptable that the RFP process allowed bad actors, such as Cogent (phonetic), to receive zone awards, especially given it's updates mandate, to consider worker safety and environmental practices, as outlined in Local Law 198 of 2019.

And, three, starting with a pilot program, rather than a full rollout is concerning. The

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legislation never envisioned a pilot program, and doing one threatens to undermine the program if it's not executed well.

Given this, how DSNY oversees its Awardees moving forward is ungently important. The proposed rules under consideration today are comprehensive and address many of the issues that the legislation was meant to prioritize, including worker safety and training, safe streets, condition of trucks, enforcement of route, and diversion of recyclable and compostable waste from the landfill.

The borough president also appreciates the DSNY clarifying the rule governing microhaulers as ensuring their continued ability to operate and to become subcontractors to Awardees was important in crafting this bill.

It is critical for DSNY to enforce these rules immediately in conjunction with the program's rollout and for the agency to take quick and decisive action if any of the Awardees are found to be in violation.

Borough President is also calling for transparency along with accountability. At

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last week's hearing, Commissionere Tisch committed to follow up with the Council by sharing Awardee submitted safety plans. DSNY should go further and make all of the Awardee-submitted plans, including safety, zero waste, education and outreach, subcontracting, et cetera, public, so that businesses can review them when choosing between designated haulers.

Thank you again for the opportunity to testify today. We look forward to seeing the program officially begin and working with DSNY to ensure that the law is as transformative to the industry, our streets, and our environment as it was intended to be.

MS. LIGUORI: Thank you, Lacey, very much.

If anyone else wishes to testify, you may do so in the chat area or use the raise-hand function. Once again, comments may be e-mailed directly to nycrule@dsny.nyc.gov by 5:00 p.m. today.

If anyone wishes to testify, please indicate so in the chat area or use the raise-hand function.

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Okay. Seeing that no one else wishes to testify, I'd like to call this hearing to a close.

Thank you, everyone, for testifying.

Once again, comments may still be submitted until 5:00 p.m. today at nycrule@dsny.nyc.gov or via the New York City Rules website.

Thank you very much for attending today's hearing.

(Time Noted: 9:44 a.m.)

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