



**The Solid Waste Advisory Boards of Brooklyn, Bronx, Manhattan and Queens** appreciate the opportunity to speak on the DSNY's proposed rule to establish fees for the disposal of yard and organic waste at DSNY-owned and operated compost facilities.

Any attempt at setting a cost basis for processing compost is an important first step in recognizing composting as a crucial policy option for NYC's valuable organics and yard waste. However, we request that the following questions be answered before rates are set:

1. What are the factors that went into the cost calculation of \$85 per ton?
2. Have any additional City or State agencies reviewed DSNY's current estimates for the cost of processing organics rates?
3. What impact, if any, will this pricing have on community composting?
4. What are the DSNY's current estimated costs for each of the following:
  - collection of organics,
  - processing of organics for compost,
  - export of organics to incineration or landfill,
  - processing of organics for co-digestion,
    - the associated export costs of the resulting digestate,
    - disposal costs for digestate, and
  - the associated transportation costs for each of the above?

Various entities have estimated these costs from NRDC to the IBO, however a definitive breakout from the DSNY has never been made public for these cost components. If these estimates were provided by the DSNY, this would allow for the crafting of important policy around the actual costs compared to the benefits of composting to the City of New York.

According to the IBO, a 14% organics capture rate would reduce CO<sub>2</sub>e emissions by 72,000 tons, and if almost all citywide organics were diverted, CO<sub>2</sub>e emissions would be reduced by 657,000 tons per year. Furthermore, the IBO acknowledges that using an EPA estimate for the social cost of carbon—set at \$42 per ton—the city could avert between \$3 million and \$28 million in carbon social costs at organics capture rates of 14-100%.<sup>1</sup> The SWABs recognize the IBO's valuation of the social impacts of composting of organics to society in terms of externalities such as air and water pollution and waste of natural resources that are currently not being taken into account.

While we cannot opine on the \$85 price in the absence of the additional information we requested, the SWABs are focused on these issues, including strengthening localized composting and the Compost Projects now that budgets have been minimally restored. However, if any non-profit compost processor should use this site, we believe they should not be charged in light of the services they are providing to the City.

---

<sup>1</sup> Fiscal Brief IBO Fiscal Brief.eps October 2021, Going Green: [Can The Organics Collection Program Be Fiscally & Environmentally Sustainable?](#)

**From:** [REDACTED]  
**To:** [NYC Rules \(DSNY\)](#)  
**Subject:** [EXTERNAL] Fees for waste collection  
**Date:** Friday, August 30, 2024 2:40:17 PM

---

You don't often get email from [REDACTED] [Learn why this is important](#)

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Forward suspect email to [phish@oti.nyc.gov](mailto:phish@oti.nyc.gov) as an attachment (Click the More button, then forward as attachment).

To whom it may concern:

You are nickle and diming people to poverty. \$12 does not seem much, but add it to the rest of the expenses have gone up and it can be hurtful. Please delete this plan.

Sincerely,  
Ms. Dilorenzo

Sent from my Samsung Galaxy , an AT&T LTE smartphone

**From:** [REDACTED]  
**To:** [NYC Rules \(DSNY\)](#)  
**Subject:** [EXTERNAL] Proposed Fees for the Disposal of Yard Waste and Organic Waste  
**Date:** Thursday, August 15, 2024 3:36:30 PM

---

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Forward suspect email to [phish@oti.nyc.gov](mailto:phish@oti.nyc.gov)<<mailto:phish@oti.nyc.gov>> as an attachment (Click the More button, then forward as attachment).

Hello,

My name is Tracy and I live in Bensonhurst in Brooklyn. I have been using the composting service since it started and I am so appreciative of it. I believe this is the right direction for garbage disposal and to a cleaner and healthier earth. However I don't see my neighbors using it a lot and I think it may be because not too many people know about the free composting and how it helps the earth. Adding a fee to the collection of compost and yard waste would deter more people from adopting composting and disposing yard waste properly. Please reconsider this proposal. It is not the right idea and moves us away from the right direction.

Best,  
Tracy  
Sent from my iPhone

# Proposed Fees for the Disposal of Yard Waste and Organic Waste

---

 [rules.cityofnewyork.us/rule/proposed-fees-for-the-disposal-of-yard-waste-and-organic-waste/](https://rules.cityofnewyork.us/rule/proposed-fees-for-the-disposal-of-yard-waste-and-organic-waste/)



---

**Rule status:** Proposed

**Agency:** DSNY

**Comment by date:** September 4, 2024

Rule Full Text

[DSNY-Proposed-Fees-for-the-Disposal-of-Yard-Waste-and-Organic-Waste-.pdf](#)

Section 16-129.1 of the New York City Administrative Code allows the Commissioner to set by rule the fees for the disposal of yard waste and organic waste at department compost facilities.

DSNY currently pays a contract operator to run the compost facilities, at a cost to the City. The Department charges fees for material delivered to its compost facilities by persons or other entities to offset these costs, as allowable by law.

DSNY has performed an analysis of its costs related to compost facilities in order to determine appropriate fees for the disposal of yard waste and organic waste. Costs considered by the Department in this analysis include payments to the contract operator to perform the services of composting and mulching and other ongoing expenses related to the operation of the facilities.

In addition, DSNY conducted a market survey of similar services provided by other public and private entities within the New York City metropolitan area and determined that the proposed fees are consistent with the market.

Finally, DSNY has determined, based on its operating experience, that it costs more to manage food waste than leaf and yard waste due to the higher nitrogen to carbon ratio, the higher rate of decay and associated need for odor controls, and the presence of non-organic materials (contamination) that must be disposed of.

Based on the Department's analysis, this proposed rule would set the rate for the disposal of leaf and yard waste at \$12 per cubic yard. A cubic yard is a volumetric measurement typically used in the industry and is how DSNY currently measures leaf and yard waste delivered to its compost facilities. Such rate would go into effect as of October 15, 2024. Thereafter, such rate would be adjusted annually after July 1st in accordance with the change in the Consumer Price Index (CPI) and such change would become effective annually on September 1st.

This rule would also establish the rate for the disposal of organic waste at \$85 per ton beginning October 15, 2024. Tons are the industry standard for putrescible solid wastes, including organics. Organic waste deliveries would be weighed upon arrival at the compost facilities. Such rate would be adjusted annually after July 1st thereafter in accordance with the change in the CPI, and such change would become effective annually on September 1st.

Attendees who need reasonable accommodation for a disability such as a sign language translation should contact the agency by calling 1 (646) 885-4786 or emailing [email protected] by **August 28, 2024**

### **Send comments by**

- **Email:** [email protected]
- **Mail:** DSNY Bureau of Legal Affairs, 125 Worth Street Room/Floor: 710 ; New York, New York 10013

## **Public Hearings**

---

### **Microsoft Teams Public Hearing**

Date

September 4, 2024

10:00am - 11:00am EDT

Location

Microsoft Teams

Connect Virtually

[https://teams.microsoft.com/join/19%3ameeting\\_ODZIZmFiOGQtZDczMS00YzEyLTImMTQtZTI2NjlmNGQ0ZWVh%40thread.v2/0?context=%7b%22Tid%22%3a%2232f56fc7-5f81-4e22-a95b-15da66513bef%22%2c%22Oid%22%3a%221d3255a2-4904-4aaa-899e-3f943348182b%22%7d](https://teams.microsoft.com/join/19%3ameeting_ODZIZmFiOGQtZDczMS00YzEyLTImMTQtZTI2NjlmNGQ0ZWVh%40thread.v2/0?context=%7b%22Tid%22%3a%2232f56fc7-5f81-4e22-a95b-15da66513bef%22%2c%22Oid%22%3a%221d3255a2-4904-4aaa-899e-3f943348182b%22%7d)

Meeting ID: 298 548 423 788 Passcode: ubWy4T Dial in by phone +1 646-893-7101,,94722531# United States, New York City

Disability Accommodation

Sign Language Interpretation

**Comments are now closed.**

---

**Online comments:** 4

**Andrea Arnold**

Make this make sense to the general public, please! There is a growing segment of our NYC population that are working diligently to support environmental projects large and small. As a Bronx building that has supported the 'brown bin' program since its inception, and has full support of all of our residents. Tell us how these fees will be charged? Which 3rd party external company, you'll no doubt select, will run the monetary collections? How the once-a-week brown bin collection schedule will change? And just why you want to see our environmental advocacy splinter into dust for a previously free program with a great deal of community support. We are a city of 8 million+ producing vast amounts of waste that can be repurposed. Don't turn this into an abandoned program. Multi-family buildings are running out of available funds due to mandated DOB requirements, FISP, Garage parapet, gas inspections, LL97 parameters, the cost utilities and the excessive Coop real estate taxes. Where are we getting the extra line item for our budgets to now meet this new cost?

Comment added August 14, 2024 11:19am

**Myrtle Smith**

It is not clear who is paying for these services. Each family has a different amount of waste. If there is a fee then people will start hoarding waste on their property and dumping will increase. In a large city some services for sanitation and rat reduction needs to be provided without cost.

Comment added August 28, 2024 1:01pm

**Mea Ambrosio**

Why doesn't NYC bag the compost & mulch and sell it.

Comment added August 28, 2024 1:13pm

## Trashy NYC

Compost pick up seems to be limited to weekends. This is problematic. Many small building owners dont have staff available on weekends to place trash out, and they'll get fined for placing it out early or bringing it in late. We get enough fines. If your'e going to charge more for diff kinds of waste, maybe start charging less for fines and increase pick up frequency.

Comment added September 1, 2024 7:21pm