



**Testimony of Alia Soomro, Deputy Director for New York City Policy
New York League of Conservation Voters
New York City Department of Sanitation**

**DSNY Proposed Implementation Dates for Sixth and Seventh Commercial Waste Zones
November 13, 2025**

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 for the opportunity to comment.

NYLCV strongly supported the passage of Local Law 199 of 2019, establishing the City's first Commercial Waste Zones (CWZ) program. Championed by a wide group of stakeholders, this law will overhaul the City's antiquated and inefficient commercial waste management system by dividing the City into 20 zones, limiting each zone to a maximum of three of private sanitation companies and five carters to provide containerized commercial waste collection services from dumpsters and compactors citywide, all selected through a competitive bid process ("awardees"). The resulting contracts with the awardees include standards for pricing, customer service, safety, environmental health, and requirements to promote the City's commitment to recycling and sustainability.

NYLCV supports DSNY's proposed rules and the implementation start date and final implementation date for the next two CWZs: Queens West and Lower Manhattan, both starting on April 1, 2026. The Department previously set the implementation start and end dates for the first five CWZs: Queens Central, Bronx East, Bronx West, Queens Northeast, and Brooklyn South. This means DSNY still has thirteen CWZs remaining to implement.

We stand with advocates calling on DSNY to release an implementation timeline for the entire CWZs system by the end of 2026. We hope the City will dedicate the requisite amount of resources and funding for staffing, education, and outreach to fully implement the CWZ law.

With a new Mayoral Administration, NYLCV urges DSNY to continue working towards transitioning to zero-emission vehicles for DSNY and commercial sanitation trucks. Additionally, the City must continue working with DCAS, utility companies, and industry professionals to ensure adequate charging infrastructure is installed and available for sanitation trucks and give extra consideration for CWZ carters with the most aggressive plans to do so. Requiring cleaner fleets as part of the City's move to CWZs is also the best way to bring measurable air quality improvements to neighborhoods that house a disproportionately high number of haulers and waste processing facilities. It is not good enough to require citywide emissions reductions. We

should also strive for more localized benefits. Lastly, we urge the next Administration to work with the City Council in expanding commercial organics separation requirements to all food businesses by the end of 2026.

The CWZ law will bring the city closer to its zero waste goals and improve the safety of workers, pedestrians, and cyclists. It will also cut down on traffic congestion, improve air quality, and curb the city's tailpipe pollution and carbon emissions, which is especially important in low-income communities and communities of color. NYLCV looks forward to seeing the timely implementation of this law citywide so all New Yorkers have the chance to breathe a little easier.

Thank you for the opportunity to comment.



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**Comments of Justin Wood, Director of Policy of
New York Lawyers for the Public Interest
to the Department of Sanitation on November 13, 2025
regarding DSNY Proposed Rule Regarding the Sixth and Seventh Commercial
Waste Zones in Queens West and Lower Manhattan**

Good morning, my name is Justin Wood and I am the Director of Policy at New York Lawyers for the Public Interest (NYLPI). We are a founding member of the Transform Don't Trash NYC coalition, which for more than a decade has advocated for fundamental reform of the city's sprawling commercial waste system. We offer the following comments on proposed rules that would set a timeline for implementation of two additional commercial waste zones in Queens West and Lower Manhattan.

1. We continue to strongly support the rapid implementation of Local Law 199 of 2019 which mandates a citywide transition to a zoned commercial waste system. The clear intent of this law is to simultaneously make the current inefficient, dangerous, and polluting commercial waste system far more transparent, accountable, efficient, and safe while giving the City the tools it needs to sharply incentivize reductions in the vast amounts of commercial waste disposed in landfills and incinerators.

Following the long-delayed implementation of the first three waste zones in 2025, we are supportive of DSNY's proposal to move forward with additional zones for a total of seven zones by May 31, 2026. Citywide implementation of this program is essential to sharply reduce unnecessary truck miles in these communities; to hold designated private sanitation companies accountable to contractual standards negotiated with the City; and to give the City the data and regulatory tools needed to measure and improve VMT, safety, waste diversion, environmental impacts, and customer service in a system that has historically been opaque.

2. We believe DSNY should set a faster pace for implementation with the goal of transitioning the entire city to the CWZ system by the end of 2026 or the first half of 2027. Expanding this successful program citywide is the best way to simultaneously achieve waste reduction, reduce vehicle miles travelled (VMT), increase worker and public safety, and reduce pollution and truck traffic burdens on environmental justice communities, at little or no additional cost to the City. Following the implementation of the first four zones in early 2026, bringing all twenty zones citywide by the end of 2026 would ensure that all NYC communities benefit immediately from the CWZ system.

Implementing the new system citywide will also enable the waste industry to accelerate the major investments needed in organics recycling facilities, modern trucks, customer service infrastructure, and community-level services such as micro haulers and waste auditors to achieve the goals of Local Law 199, the Zero Waste Act and the New York Climate Leadership and Community Protection Act (CLCPA).

3. We note that while neither of the zones proposed in this rule contain a DSNY marine transfer station, the Queens West zone contains a large privately owned rail transfer station with excess permit capacity. DSNY, the rail transfer station owner, and the designated haulers for this zone should partner to maximize the usage of the rail facility for non-recyclable disposed waste collected from customers in the zone. This could advance long-overdue waste equity promises of the current Solid Waste Management Plan by reducing commercial haulers' reliance on diesel long-haul trucks to export waste via transfer stations clustered in overburdened communities.

4. We call for rigorous enforcement, and support for small business customers as DSNY brings additional zones online.

The Commercial Waste Zones Annual Report published in October includes the first real-world data on VMT, quantities of waste collected for disposal and recycling, and safety violations. While these data provide a valuable baseline from which to measure progress the goals of Local Law 199, the initial report reveals that during the first six months of 2025, only 26% of commercial waste collected in the first waste zone in Central Queens was separated for recycling and composting, meaning that more than 74% is being trucked to landfills and incinerators.

We here echo the recommendations we recently published in "[A People's SWMP](#)," including:

- Passing local legislation to require all NYC businesses and haulers to follow uniform separation rules for organics and other recyclables, and synchronizing customer and public education messaging and materials across the commercial and residential sectors;
- Evaluating mechanisms to better incentivize haulers to partner with customers to implement robust waste reduction and recycling programs including food donation and organic waste recycling programs;
- Expediting completion of a commercial waste characterization study to better enable DSNY's enforcement personnel, designated commercial haulers and microhaulers in each zone, and independent waste auditors to target education, programming, and waste reduction services to customers to maximize diversion.

5. Increase Transparency as the CWZ Program Expands

As DSNY enters into contracts with three designated haulers for each zone, the public, customers, and various CWZ stakeholders should be able to easily access each company's waste diversion plans, customer education plans, VMT reduction plans, prices, and the names and qualifications of all subcontractors, transfer stations, recycling facilities, and micro-haulers that the designated haulers intend to utilize to service the zone. Similarly, we urge the Department to publish and regularly update data and metrics being collected to evaluate the progress toward the goals of Local Law 199 in each zone and citywide.

Thank you for the opportunity to submit comments on these proposed rules. We hope to work in partnership with DSNY, the City Council, Borough Presidents, and the many community and business stakeholders to ensure that this innovative new system reaches its envisioned transformational potential.

Sincerely,

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