

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

-----X

THE CITY OF NEW YORK
DEPARTMENT OF SANITATION
PROPOSED RULE RELATING TO ENTITIES
ENGAGING IN CLEANING SERVICES
PUBLIC HEARING

-----X

February 10, 2025
10:03 a.m.
Remotely via
Microsoft Teams

Julia M. Speros
Court Reporter

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

2

1

2 A P P E A R A N C E S:

3 Madelynn Liguori, Esq.
4 Director of Regulatory Compliance and
5 Enforcement
6 Executive Agency Counsel
7 Department of Sanitation

6

7

8 TESTIMONY GIVEN BY THE FOLLOWING INDIVIDUALS:

9 Tom Harris, Times Square Alliance

10 Pedro Suarez, Third Avenue BID

11 Rob Byrnes, President, East Midtown Partnership

12 Dr. Camelia Tepelus, Executive Director, Morris
13 Park Business Improvement District

14 Francesca Fernandez Bruce, Executive Director,
15 Grand Street BID

16 Regina Myer, Downtown Brooklyn Partnership
17 Dirk McCall de Paloma, Executive Director,
18 Sunnyside Shines Business Improvement District

19 Fred Cerullo, President/CEO, Grand Central
20 Partnership

21 Matthew Bauer, President, Madison Avenue BID

22 Barbara Blair, Garment District Alliance

23 James Martin, Executive Director, ACE

24 Mark Dicus, Fifth Avenue BID

25 Layla Passman, Atlantic Avenue BID

24

25

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

TESTIMONY GIVEN BY THE FOLLOWING INDIVIDUALS:
(Continued)

Ben Ackert, Senior Manager, Operations Planning
for the Downtown Alliance

Laura Rothrock, NYC BID Association

Patricia Maltezos, Planning and Development
Director, Hudson Yards Hell s Kitchen Alliance

David Estrada, Executive Director, Sunset Park
5th Avenue BID

Jeffrey LeFrancois, Executive Director,
Meatpacking District Management Association

Dan Scorse, Vice President of Operations, Hudson
Yards Hell s Kitchen Alliance

Corey Kunz, Senior VP, Hudson Square BID

Cordelia Persen, Executive Director, NoHo BID

Lauren Elvers Collins, Executive Director,
Church-Flatbush Community Alliance

Kalvis Mikelsteins, VP, Planning and Operations,
Dumbo Improvement District

Cate Byrne on behalf of the Office of Council
Member Aviles

Daniel Bernstein, Executive Director,
Columbus-Amsterdam Business Improvement District

James Ellis, Executive Director, North Flatbush
Avenue BID

Albert Dalipi, Deputy Director, Fordham Road
Business Improvement District

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

TESTIMONY GIVEN BY THE FOLLOWING INDIVIDUALS:
(Continued)

C. Virginia Fields, 125th Street Business
Improvement District

Tiera Mack, Executive Director of the Pitkin
Avenue BID

Nate Reynolds, Clean Bushwick Initiative

Marta Schlitzer, Jackson Heights Beautification
Group Tree LC

Monica Blum, President, Lincoln Square BID

Catie Savage, Litter Legion

Allie Falco, Queens Trash

Noah Sheroff, Bayside Village BID

Claire Mifflin, Center for Zero Waste Design

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

PROCEEDINGS

MS. LIGUORI: Good morning and welcome. My name is Madelynn Liguori. I am the Director of Regulatory Compliance and Enforcement and Executive Agency Counsel for the Department of Sanitation.

Thank you for attending the 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 public rule relating to commercial waste -- relating to entities engaging in cleaning services.

This rule was published by DSNY in The City Record on December 30, 2024, with a scheduled hearing date of today, February 10, 2025. Additionally, DSNY mailed copies of the rule to all New York City local-elected officials, the City's 59 community boards, media and interested parties, and published the

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

6

1 proposed rule on its website.

2 DSNY -- sorry. DSNY also engaged
3 with members of the regulated community
4 to discuss their operational concerns
5 regarding how they may be able to
6 containerize waste.

7 Can I please ask everyone to mute
8 themselves? Thank you.

9 Section 16-120(e)(2) of the New York
10 City Administrative Code prohibits the
11 placement of households or commercial
12 refuse upon any sidewalk, street, public
13 place, wharf, pier, dock, bulkhead,
14 slip, navigable waterways or other
15 areas, whether publicly or privately
16 owned, except in accordance with the
17 rules of the Department relating to
18 collection.

19 The purpose of this rule is to
20 clarify that any entity that performs or
21 causes others to perform cleaning
22 services, such as manual sweeping and
23 cleaning of sidewalks, public plazas,
24 streets, curbs, and gutters or emptying
25 of public litter baskets, for the

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 purposes of supporting local businesses
2 or communities, may not place any amount
3 of refuse or recycling within the
4 vicinity of any public litter basket or
5 at any other location described in
6 Section 16-120(e)(2) of the New York
7 City Administrative Code, except in
8 accordance with the rules of the
9 Department relating to collection.

10 The proposed rule also requires that
11 such materials be placed out for
12 collection by the Department in rigid
13 receptacles with tight-fitting lids. An
14 entity, for purposes of this rule, shall
15 mean any business improvement district,
16 merchants association, neighborhood
17 association, or other non-governmental
18 organization.

19 Any entity violating the prohibition
20 of placing any amount of refuse or
21 recycling out in bags for Department
22 collection within the vicinity of any
23 public litter basket, or for any other
24 reason at any other location described
25 in Section 16-120(e)(2) of the

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 Administrative Code, shall be subject to
2 the civil penalties for violations of
3 Section 16-120(e)(2) of the
4 Administrative Code.

5 Bags of waste placed out on the
6 sidewalk attract rats and vermin. These
7 changes align with the City's commitment
8 to cleaning up New York City streets and
9 reducing food sources for rents, and
10 aligns with the City's initiatives to
11 increase the use of containers for waste
12 storage and collection, creating
13 cleaner, more livable, and more vibrant
14 streets and neighborhoods across New
15 York City.

16 A court reporter is present today
17 and will record the hearing. You may
18 present an oral statement or submit
19 written comments concerning the rule.

20 We have been accepting written
21 comments on the proposed rule since it
22 was published. Today is the deadline
23 for the submission of written comments.

24 Such comments may be emailed
25 directly to nycrules@dsny.nyc.gov by 5

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 p.m. today.

2 DSNY will make available a copy of
3 all written comments received through
4 today, together with the hearing
5 transcript, for viewing on its website
6 within the next few weeks. DSNY will
7 carefully consider all comments it
8 receives today at the hearing and all
9 written comments it receives.

10 I will begin calling those of you
11 who wish to speak this morning in the
12 order in which you have signed up to
13 testify.

14 While the notice asks that persons
15 wishing to testify sign-up in advance of
16 this hearing, anyone wishing to testify
17 at this time may do so by indicating in
18 the chat area that you wish to testify
19 by indicating your name and affiliation,
20 if any. When you speak, please say your
21 name and affiliation, and speak slowly
22 and clearly so that the court reporter
23 can understand and accurately record
24 your statement.

25 We also ask that you limit your

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

10

1 statement to three minutes since we have
2 many people that are signed-up to
3 testify. If I ask you to finish up your
4 testimony, that means the three-minute
5 time period has ended.

6 I'm going to begin by calling the
7 first person, Noah Sheroff from the
8 Bayside Village BID.

9 Noah, are you on?

10 (No response.)

11 MS. LIGUORI: We are going to move
12 onto Andrew Yen from Clean Up Crown
13 Heights.

14 (No response.)

15 MS. LIGUORI: Andrew Yen from Clean
16 Up Crown Heights.

17 (No response.)

18 MS. LIGUORI: I will come back
19 around to these people after we finish
20 the list.

21 Okay. Mario Buonviaggio from Port
22 Richmond Northshore Alliance.

23 (No response.)

24 MS. LIGUORI: Mario?

25 (No response.)

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

11

1 MS. LIGUORI: Okay. Alex Hunt from
2 The DOE Fund.

3 UNKNOWN SPEAKER: The DOE Fund is
4 here, but not intending to testify
5 today.

6 Good morning, everybody.

7 MS. LIGUORI: Okay. So, Mr. Hunt is
8 not testifying then?

9 UNKNOWN SPEAKER: He's not -- no,
10 he's not testifying.

11 MS. LIGUORI: Thank you very much.

12 Okay -- okay. Tom Harris from the
13 Times Square Alliance.

14 MR. HARRIS: Thank you very much.

15 My name is Tom Harris, President for
16 the Times Square Alliance. I want to
17 start by affirming our respect for the
18 men and women of the Department of
19 Sanitation who do a thankless job and I
20 want to acknowledge them for their
21 dedication to the City.

22 I do want to comment specifically
23 about these proposed rules, which create
24 an unfunded mandate for all BIDs to
25 containerize, and they impose monetary

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 fines for failing to comply.

2 In short, these rules show a lack of
3 understanding of how BIDs work. BIDs
4 are uniquely effective because each
5 district assesses its needs and
6 dedicates resources accordingly. Each
7 district and Board of Directors, not the
8 City or any City agency, determines
9 those needs.

10 BIDs supplement City services. They
11 don't replace them. While the
12 Department of Sanitation views these
13 rules as the City's next step in
14 containerization, the difference is,
15 other efforts were for commercial or
16 private garbage.

17 Garbage BIDs choose to collect
18 public garbage that is the
19 responsibility of the Department of
20 Sanitation. BIDs that are on the street
21 are there because the Department of
22 Sanitation services do not meet the
23 City's demands.

24 The Alliance pioneered
25 containerization. We chose to do this

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 because given the volume of our garbage
2 and our ability to remove it,
3 containerization makes Times Square
4 cleaner. We cannot support a policy
5 that issues a mandate that all business
6 improvement districts who pick up the
7 City's public garbage must comply or
8 risk monetary penalties.

9 Times Square pioneered and was able
10 to quickly adopt containerization
11 because we had the need, desire,
12 resources, and capacity to do so. The
13 vast majority of the 76 BIDs in the City
14 do not have that same ability, often
15 operating with minimal staff and with
16 budgets under one million dollars.

17 They are already stretched in their
18 efforts to keep their district clean,
19 safe, and desirable. These rules will
20 result in smaller BIDs, abandoning
21 sanitation services, and require the
22 Department of Sanitation to do more.

23 As for fines, the Alliance sweeps
24 streets, empties garbage cans,
25 containerizes that garbage, and

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 transports 100 percent of that public
2 garbage to sanitation garages. Our goal
3 is to have zero bags on the street and
4 99 percent of the time we achieve that
5 goal. The other one percent is often
6 because there was either more garbage
7 than normal or because someone dumped
8 garbage near our containers.

9 It is ridiculous to even consider
10 fining us for experiencing an unusually
11 heavy garbage day or for another entity
12 dumping at our locations.

13 We value our partnership with the
14 Department of Sanitation. True partners
15 compromise and work together to resolve
16 conflicts. They do not exert power
17 through punitive rules and mandates.

18 A clear acknowledgement of the
19 Department of Sanitation, valuing this
20 partnership, would be to rescind these
21 mandates and work with each BID to come
22 up with a shared vision for making each
23 neighborhood cleaner and bag-free.

24 Thank you.

25 MS. LIGUORI: Thank you very much,

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 Mr. Harris.

2 The next person we have is Pedro
3 Suarez from the Third Avenue BID.

4 Mr. Suarez.

5 MR. SUAREZ: Yes, can everyone hear
6 me?

7 MS. LIGUORI: Yeah.

8 MR. SUAREZ: Okay. Great.

9 My name is Pedro Suarez and I'm the
10 Executive Director of The Third Avenue
11 Business Improvement District, also
12 known as "The Hub" in the South Bronx,
13 bordering the neighborhoods of Melrose
14 Mott Haven. I represent a community of
15 over 300 businesses over 18 block bases.

16 As one of the oldest and most
17 heavily trafficked BIDs, our services
18 around supplemental sanitation represent
19 between 30 to 40 percent of our overall
20 annual budget. Our organization
21 provides supplemental sanitation
22 services that support the City's effort,
23 particularly the Department of
24 Sanitation, in keeping the district
25 clean.

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 Illegal dumping in the district has
2 put even more strain on our
3 organization's resources.

4 At the end of last year, we
5 conducted a walk-through of my district
6 with the Council Member Rafael Salamanca
7 and former DSNY Commissioner Tisch to
8 discuss the challenges around illegal
9 dumping and other quality of life
10 concerns, and the need for additional
11 DSNY cameras to conduct illegal dumping
12 investigations, which have only been
13 made more difficult through ghost plates
14 and difficult to catch these culprits.

15 I've met with containerization
16 vendors such as CITIBIN and metroSTOR,
17 and the cost of implementing full
18 containerization would be approximately
19 20,000 to \$50,000 in our district. That
20 expense represents over 10 percent of
21 our annual City assessment.

22 We already have one set of eight
23 containers and these containers have
24 often been --

25 UNKNOWN SPEAKER: They just sent it

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 to me.

2 MR. SUAREZ: Sorry -- and these
3 containers have often attracted unwanted
4 quality of life issues, including
5 homeless encampments, defecation,
6 illegal dumping, and drug use.

7 We have to regularly report these
8 issues to 211 and coordinate operations
9 with DSNY, NYPD, and DHS. We fear that
10 additional permanent containers would
11 provide similar challenges and we do not
12 have the storage space to have what they
13 call "rollie-bins".

14 I do not believe August 1, 2025 is a
15 realistic timeline for all BIDs to be
16 compliant with these rules, as we are in
17 the middle of our current fiscal year
18 and still have yet to plan our next
19 fiscal year, which requires Board input
20 and approval.

21 Additionally, BIDs only provide
22 supplemental sanitation, as stated, for
23 public waste that does not belong to
24 BIDs. As such, issuing fines to BIDs
25 providing public waste is not

1 appropriate.

2 We also recommend that DSNY work
3 with BIDs to establish set-out times and
4 DSNY collection schedules. BIDs should
5 not be receiving any fines outside of
6 established set-out times of DSNY
7 collection schedules and outside of our
8 normal operating hours. We are not 24/7
9 organizations.

10 I look forward to further
11 discussions with SBS, DSNY, DOT,
12 elected-officials in the Mayor's office
13 to create an implementation strategy
14 that is responsive to the needs of the
15 district and the people of the South
16 Bronx, but it cannot be August 1st.

17 Thank you.

18 MS. LIGUORI: Thank you very much,
19 Mr. Suarez.

20 Next person I have is Rob Byrnes,
21 the President of the East Midtown
22 Partnership.

23 Mr. Byrnes, are you on?

24 MR. BYRNES: I am. Thank you.

25 Good morning. As you noted, I'm Rob

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 Byrnes. I'm President of the East
2 Midtown Partnership, which is Manhattan
3 Business Improvement District, and I
4 want to thank you for the opportunity to
5 comment on the proposed rule.

6 Our BID was formed in 2002 to
7 specifically meet the cleanliness needs
8 of our community. Since then, we've
9 removed more than three million bags of
10 trash and recycling from district
11 streets. We spend almost two million
12 dollars a year -- it's almost half our
13 budget I should say -- about 1.5 million
14 dollars a year on sanitation.

15 The goals of DSNY are laudable, but
16 we're concerned that the accelerated
17 timeline will lead to flawed
18 implementation and dirtier streets
19 overall.

20 First, no BID president or executive
21 director has the power to unilaterally
22 design and place containers on the
23 streets, or to appropriate the tens or
24 hundreds -- we estimate hundreds of
25 thousands of dollars this project will

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 cost for us. We would need the
2 cooperation of our Board of Directors
3 and other stakeholders.

4 And -- but, however, unilateral
5 action would be the only way to roll-out
6 a major project of this type in just a
7 few months.

8 Frankly, manufacturing alone will
9 take most of the time period between now
10 and August 1st, resulting in a rush
11 decision-making process and we also need
12 to do this in the middle of a fiscal
13 year.

14 When our BID adopted our FY 2025
15 budget last May, we had no idea an
16 expensive project like this was not only
17 going to be a mandate from City Hall,
18 but would also require us to find
19 funding for it in the middle of a budget
20 year.

21 If the implementation date were
22 moved to 2026, most BIDs would be able
23 to properly design, budget for, and
24 implement a waste containerization
25 program. In addition, at minimum, the

1 City should allocate funding for small
2 BIDs and other smaller organizations,
3 which might otherwise have to end their
4 sanitation programs altogether due to
5 this new expense.

6 When it comes to BID waste
7 containerization program, we can do it
8 quickly and in a slip-shot manner or we
9 can do this thoughtfully and properly.

10 I look forward to a program that
11 continue -- that works for everyone and
12 proves to the nation that New York City
13 continues to lead the way in innovative
14 public improvement.

15 I have additional remarks in my
16 written testimony. Thank you very much
17 for this opportunity.

18 MS. LIGUORI: Thank you very much,
19 Mr. Byrnes.

20 The next up we have is Dr. Camelia
21 Tepelus, the Executive Director of the
22 Morris Park Business Improvement
23 District.

24 MS. TEPELUS: Good morning,
25 Madelynn. Good morning, everybody.

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

22

1 Let me just start by giving a huge
2 shout-out of thanks to the hard working
3 people of DSNY that clear Morris Park
4 Avenue. Absolutely wonderful from --
5 from Saturday to Sunday. Kudos to
6 Vincent Allard, our Superintendent, and
7 to Frank Lettera for trying to figure
8 this out together with us.

9 I just want to say, this was a
10 mandate that we all agree with in
11 principle. Nobody wants to see plastic
12 bags at the corner of our streets.

13 However, this is also a mandate that
14 tells us, "Make the trash disappear by
15 magic". Nothing happens by magic. Does
16 cleaning in your own home happen by
17 magic -- no. Somebody neatly puts the
18 trash together and somebody takes it
19 away someplace. It's not magic.

20 It is -- it is careful planning,
21 coordination, analysis, and finally,
22 execution that costs money.

23 It is critical to remember that even
24 though we BIDs are privately-funded by
25 commercial property owners, at the end

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

23

1 of the day -- and just like our friends
2 at DSNY -- we are providing a public
3 service; a service ensuring that
4 commercial corridors create a positive
5 pedestrian shopping experience and bring
6 taxpayers' money to the budget of our
7 beloved City.

8 We are now paralyzed knowing that we
9 will not afford to transport the trash
10 ourselves, which is, one, the mandate of
11 your agency -- of DSNY; and, second,
12 would be both unaffordable and cause us
13 to cut other critical programs --
14 beautification, community events,
15 holiday lights, etcetera -- that make
16 our City the vibrant city that we have.

17 At the moment, what we are doing is
18 basically stacking our existing trash
19 cans, like, literally like this
20 (indicating), as much as possible, and
21 hope that this will be sufficient due to
22 the awful traffic in the cold weather.
23 But come summer, we will need a
24 procedure and a process agreed with
25 DSNY, and especially with DOT.

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 I mean, if you want to compare us
2 with something, do not compare us with
3 individual businesses. I have 21
4 blocks. I have 80 corners. I mean, you
5 need to provide me with -- if you want
6 me to compare BID public trash with an
7 entity, compare me with a large
8 apartment building or with a school --
9 and you do provide these type of
10 wonderful containers that could -- I
11 mean, you -- I don't know if you see
12 (indicating) -- you know what I mean --
13 the large Empire bins, which by
14 agreement with DSNY and DOT, we could
15 place at some point and instruct our
16 staff to place there the excessive
17 trash.

18 This mandate is feasible, but this
19 regulation is poorly written. It's
20 over-simplifying and it's showing --
21 also, may I say -- a certain level of
22 disrespect to the work we are doing to
23 support the City, to collect taxpayers'
24 funding that comes to create this
25 wonderful this -- wonderful place where

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 we're living.

2 Finally, we are here to support
3 cleanness in the City, alongside working
4 with DSNY in smart, data-driven ways to
5 make this reality possible. No more
6 plastic bags in New York City commercial
7 corridors. We are optimistic that,
8 together, we can devise a strategy that
9 is optimally applicable to each
10 commercial corridors' needs.

11 Please allow at least one more year
12 until August 2026 to improve this rule
13 and to give us sufficient time to
14 articulate -- along with your
15 operational teams -- DSNY mechanisms for
16 implementation to the desired aim of
17 this regulation that we fully support.

18 But we feel that, along with the
19 DSNY, we can be smarter -- smarter about
20 cleaning our commercial corridors from
21 plastic bags.

22 So, once again, I thank you all and
23 I genuinely beg for the understanding of
24 -- how to say -- of the partnership that
25 we have going on that make this City the

1 capital of the world.

2 Thank you.

3 MS. LIGUORI: Thank you very much.

4 Next we have is Francesca Fernandez
5 Bruce, the Executive Director of the
6 Grand Street BID.

7 MS. BRUCE: Hi. Good morning. I
8 hope everyone can hear me. Thank you so
9 much for taking the time to listen
10 today.

11 Yes, my name is Francesca Bruce and
12 I direct the Grand Street BID, which
13 serves an LMI community in East
14 Williamsburg, really, at the frontier of
15 some of the most powerful pressures of
16 redevelopment, and displacement, and
17 shifting policy in the City.

18 And this means that we're constantly
19 juggling priorities on a completely
20 maxed-out budget, which we can't raise
21 without adding to these pressures on our
22 neighbors -- on our mom-and-pops and
23 small businesses -- and on families
24 trying to afford a place to live and we
25 also can't raise it within the timeframe

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 allotted.

2 Further, we have a budget of around
3 350,000, nearly a third of which already
4 goes to clearing a never-ending flow of
5 public litter and choking debris on the
6 street that does not, in fact, come from
7 the BID, but supplements the DSNY's own
8 work.

9 And so when we received this
10 ruling -- which, by the way, solves
11 nothing in our district since our
12 problems are not predominantly rats, but
13 structural -- our hearts really sank.

14 DSNY implies that we need to sort of
15 pull our own weight, but we're really
16 doing the job of the agency collecting
17 public trash that they can't keep up
18 with so that our community can thrive,
19 and the rule pretends to be agnostic
20 about solutions, but instead is sort of
21 willfully deaf to the lack of solutions.

22 The supposed affordable wheelie-bins
23 are really just a straw-man. They're
24 both inadequate to the task at hand and
25 truly impossible to implement.

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 Meanwhile, the CITIBINS, the only other
2 option DSNY has really shared with us,
3 could nearly double our sanitation costs
4 in the first year, including
5 installation and maintenance of
6 equipment and protections. This is not
7 accounting for any issues around
8 procurement or otherwise.

9 So, we really simply can't afford to
10 comply with this policy presently,
11 putting us in an impossible situation.
12 We are either to stop providing the
13 supplementary service that allows our
14 corridor to be marginally functional for
15 living and working, or slash nearly
16 every other supportive program in our
17 budget.

18 This unfunded and imminent mandate
19 will cripple our organization, and our
20 corridor, and our community, and
21 something really, truly has to give.

22 So, I urge you, please, to consider
23 alternatives presented by my colleagues
24 so that we can continue our service to
25 our community in these really

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

29

1 challenging times.

2 Thank you so much.

3 MS. LIGUORI: Thank you very much.

4 The next we have to testify is
5 Regina Meyer from the Downtown Brooklyn
6 Partnership.

7 (No response.)

8 MS. LIGUORI: Okay. Dirk McCall de
9 Paloma, the Executive Director --

10 MS. MYER: Hello --

11 MS. LIGUORI: Hello?

12 MS. MYER: Hello?

13 MS. LIGUORI: Yeah --

14 MS. MYER: I'm here -- I'm here.

15 MS. LIGUORI: Oh, Regina -- Oh, Ms.
16 Myer -- okay.

17 MS. MYER: Yes, I'm sorry.

18 MS. LIGUORI: Okay.

19 MS. MYER: Okay. Hi. I'm Regina
20 Meyer, President of the Downtown
21 Brooklyn Partnership. I truly
22 appreciate this opportunity to testify.

23 The Downtown Brooklyn Partnership
24 manages three business improvement
25 districts that cover the entirety of

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

30

1 Downtown Brooklyn, including some of the
2 City's most highly trafficked -- traffic
3 commercial quarters, such as Fulton Mall
4 and popular attractions, like Barclays
5 Center, the Brooklyn Paramount, and the
6 Brooklyn cultural district.

7 The neighborhood is home to 65,000
8 residents, 35,000 university students,
9 and 85,000 --

10 UNKNOWN SPEAKER: Regina, you're
11 cutting out from me.

12 MS. MYER: I'm --

13 UNKNOWN SPEAKER: You're cutting out
14 for me. I'm not able to hear you
15 anymore.

16 UNKNOWN SPEAKER: I can hear you
17 just fine.

18 MS. LIGUORI: I believe we all can
19 hear her. Maybe it's -- maybe you might
20 want to just redo your audio.

21 MS. MYER: Can you hear me -- hello?

22 MS. LIGUORI: Yes -- yes, you are
23 clear.

24 MS. MYER: Okay -- okay.

25 Okay. Thank you.

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 To stay on top of the enormous waste
2 that is a byproduct of our busy streets,
3 DBP operates two dedicated trucks --
4 trucks and crews that manage the
5 collections from 11 staging locations,
6 167 Bigbelly solar trash units, and 41
7 street cans.

8 Each day these crews transport 550
9 bags of 22,000 gallons of street trash
10 from Downtown Brooklyn directly to DSNY
11 at their depot in Gowanus. We undertake
12 this enormous amount of work to fill the
13 gaps of DSNY's services. We truly
14 appreciate that they are doing as much
15 as they can, but we recognize that we
16 must perform this supplemental service.

17 While DBP supports the moves toward
18 containerization, the proposed rule as
19 written would push the expense of
20 compliance and threatens fines on BIDs
21 and neighborhood associations who are
22 providing public services at little or
23 no cost to the City.

24 Additionally, the requirement to
25 containerize trash runs against the fact

1 that we do not have site control or
2 storage facilities and we don't have the
3 ability to approve or occupy sidewalks
4 or parking lanes for trash containers,
5 24/7.

6 In the meantime, the Partnership has
7 made significant strides in starting to
8 containerize trash, implementing
9 curbside containers at a few locations
10 through DSNY's wise Clean Curbs grant.
11 Recently, we secured approval for an
12 additional site and are collaborating
13 with DSNY to enhance service levels,
14 optimizing the efficiency of our
15 supplemental sanitation efforts in
16 Downtown Brooklyn.

17 We want to help -- continue to help
18 keeping the City clean and keeping our
19 streets beautiful, but we should not be
20 penalized for doing the work that --
21 that DSNY doesn't have the capacity to
22 do.

23 We urge Sanitation to continue to
24 work with the BIDs as partners so we can
25 achieve solutions to make neighborhoods

1 cleaner and bag free.

2 Thank you.

3 MS. LIGUORI: Thank you very much.

4 The next to testify is Dirk McCall
5 de Paloma, the Executive Director of the
6 Sunnyside Shines Business Improvement
7 District.

8 She will be followed by Fred
9 Cerullo, the President and CEO of the
10 Grand Central Partnership, or if he's
11 not available, Ryan Pukos.

12 MR. McCALL DE PALOMA: Hi. Thank
13 you for this opportunity to comment on
14 the proposed rule. My name is Dirk
15 McCall de Paloma and I'm the Executive
16 Director of the Sunnyside Shines
17 Business Improvement District in Queens.

18 This is an incredibly important
19 topic and I think we're all in agreement
20 that containerization is a good
21 approach, and one that will be helpful
22 as we combat rats and keep our
23 commercial corridors clean. I do want
24 to express alarm and dismay, however, at
25 the timeline and how this is going to

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 impact smaller BIDs across the City.

2 Sunnyside Shines covers 11 blocks
3 north and south of Queens Boulevard,
4 from 38th Street to 50th Street, and the
5 first six blocks of Green Point Avenue,
6 as well as the first block of Roosevelt
7 Avenue. Our assessment is only 360,000
8 annually. We're not one of the smallest
9 BIDs, but neither are we well financed.

10 We work hard to identify additional
11 funding streams to augment our
12 assessment and allow us to do work to
13 serve our commercial corridors and
14 communities. Like the majority of BIDs
15 in the City, we contract out our street
16 sanitation work. We work with
17 Streetplus, and have since our formation
18 of 2008, and our street team clean are
19 very good at sweeping up and emptying
20 the trash cans along Queens Boulevard
21 and Green Point Avenue.

22 We work hard to keep our sidewalks
23 and street-bed litter free and to
24 prevent our merchants from being fined
25 for trash.

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 Our corridors are very restaurant
2 and food/drink venue heavy and our trash
3 cans fill up very quickly. We have to
4 pay quick attention to them and often
5 have to empty them twice a day.

6 We estimate that containerization
7 would cost us over 50,000; money that's
8 not currently in our budget. This is a
9 great goal, but there's no mechanism for
10 the City to help fund the purchase of
11 CITIBIN containers or metroSTOR
12 containers, and no proposal on how we're
13 supposed to increase the number of our
14 sanitation crew to move that bagged
15 trash to other locations.

16 We're not opposed to finding a way
17 to make this work, but we need funding
18 streams that allow us to implement these
19 plans while continuing our other work.

20 We are very successful in getting
21 money from the City of the State, but
22 even if we're successful in getting this
23 funding, the budget money will not even
24 be contracted by August, let alone in
25 September, when the fines are scheduled

1 to begin.

2 If the implementation were able to
3 be delayed by a year to late 2026, most
4 of us would probably likely be able to
5 find some support to find ways to start
6 implementing this.

7 But like many unfunded mandates, the
8 goals are laudatory, but goals that are
9 laudatory without any ability to pay for
10 them is really problematic and we urge
11 DSNY to delay this.

12 Thank you.

13 MS. LIGUORI: Thank you very much.

14 Our next to speak is Fred Cerullo,
15 the President and CEO of the Grand
16 Central Partnership, and if he's not
17 here, Ryan Pukos --

18 MR. CERULLO: Thank you.

19 MS. LIGUORI: -- okay. Great.

20 Thank you.

21 MR. CERULLO: Hi -- thank you. This
22 is Fred Cerullo.

23 As an organization that dedicates
24 over 80,000 staff-hours annually to
25 sanitation and collects and prepares

1 almost 200,000 bags of municipal waste
2 generated by the public, the Grand
3 Central Partnership clearly understands
4 the impact that garbage disposal has on
5 quality of life in our communities.

6 As a consequence, GCP has also made
7 significant investments in operations
8 and technology to reduce the time trash
9 bags remain on the curb awaiting the
10 Department of Sanitation pick-up.

11 GCP strongly supports the goals of
12 containerization. In fact, we worked
13 years ago with stakeholders to develop a
14 similar plan, albeit unsuccessful at the
15 time, to remove public trash bags from
16 the sidewalks and store them in
17 centralized containers on private
18 property.

19 However, this proposed rule is
20 highly problematic, and, frankly,
21 insulting for several reasons.

22 First, to reiterate, this is not our
23 private waste. It is the municipal
24 waste generated by the public. GCP
25 simply sweeps it, bags it, and prepares

1 it for eventual pick-up by DSNY, or a
2 private carter we privately fund, to
3 support New York's strongest, preventing
4 overflowing garbage receptacles and
5 dirty streets.

6 Treating entities like GCP as
7 illegal dumpers is a slap in the face to
8 all BIDs and the long-standing
9 partnership we have had with the City in
10 supplementing core services that it
11 cannot fully provide itself.

12 Since the 1980s, BIDs have partnered
13 with the City to fill critical gaps in
14 City services and bring sanitation
15 standards to an acceptable level. To
16 impose financial penalties on BIDs for
17 simply providing services that DSNY is
18 ultimately responsible for is
19 outrageous.

20 Another critical issue is the
21 one-size fits all approach to the rule
22 process. Each BID has its own unique
23 character, with different types of
24 building density, foot traffic, and
25 waste generation. A rigid rule that

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 does not account for these differences
2 is likely to be difficult to implement
3 and will have unintended consequences.

4 Finally, the most complicated hurdle
5 that GCP and other BIDs have to overcome
6 involves actually siting of these
7 containers. Our desire to comply with
8 detailed regulations issued by two City
9 agencies governing the size and
10 materials of containers in the
11 permissible locations that can be
12 installed have not aligned with our
13 ability to find suitable locations that
14 do not obstruct and block commercial and
15 retail businesses in our community --
16 and even if GCP and other BIDs located
17 private but readily accessible locations
18 for the containers, it's unclear whether
19 DSNY would service them.

20 Enforcement of the recently launched
21 business containerization program has
22 been inconsistent. More time and
23 resources should be dedicated to fully
24 implementing and evaluating these
25 initiatives, instead of penalizing BIDs

1 for stepping in to provide crucial
2 sanitation services and we urge DSNY to
3 focus on refining existing programs and
4 learning from those experiences and
5 continuing to collaborate with BIDs.

6 In conclusion, while
7 containerization has merit, the way this
8 policy has been rolled out has been
9 horrendous. Any rule penalizing BIDs
10 for doing this work should be stopped
11 and we implore DSNY to reconsider its
12 approach and work with us to find
13 solutions that balance the needs of our
14 neighborhoods with the City's goals
15 without penalty to their partners.

16 Thank you.

17 MS. LIGUORI: Thank you, Mr.
18 Cerullo.

19 Next up is Matthew Bauer -- and just
20 so everyone knows, I am putting in the
21 next five speakers. The next five
22 speakers are already listed in the
23 comment section -- in the chat section.

24 Matthew Bauer, the President of the
25 Madison Avenue BID.

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 MR. BAUER: Good morning, everyone.
2 I'm Matthew Bauer, President of the
3 Madison Avenue BID. I'm also the
4 treasurer of the New York City BID
5 Association.

6 I just want to lend our support, of
7 course, to the BIS Association's
8 testimony, which is being delivered
9 separately.

10 We also share thanks to the men and
11 women of the Department of Sanitation
12 for their terrific work, and we, of
13 course, share everyone's goals for
14 removing bags on the street.

15 With that said, I think, you know,
16 one of the really big losers in this
17 proposed rule would be the businesses
18 and property owners that are at the
19 corners of our districts.

20 You know, folks are constantly
21 dumping trash -- sometimes properly,
22 sometimes improperly -- at these cans.
23 They overflow and it's our work to try
24 to neaten them up and make it look
25 suitable for customers -- for the

1 community at the corners.

2 There's absolutely no way that this
3 enforcement of, you know, dumping or --
4 where a pick-up can be constantly
5 happening throughout the day. So, if
6 we're not doing this work, and if we're
7 not, we're going to see bags
8 overflowing. You're going to see debris
9 on the sidewalks and potentially
10 businesses on the corners will
11 unfortunately may have to be -- result
12 in fines for the sidewalk debris all
13 because of dumping that may happen from
14 elsewhere that businesses have no fault
15 at.

16 So, therefore, we really do want to
17 encourage DSNY to reconsider this
18 rule-making in continuing with the work
19 in partnership with business improvement
20 districts to make sure that our corners
21 are as clean and as beautiful as they
22 can be.

23 Thank you so much.

24 MS. LIGUORI: Thank you.

25 The next up to testify, Barbara

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 Blair or Jerry Scupp from the Garment
2 District Alliance.

3 MS. BLAIR: Yes, hello. Good
4 morning. I'm Barbara Blair, President
5 of the Garment District Alliance, a BID
6 in Midtown Manhattan.

7 I'm responding to DSNY regarding --
8 regarding containerization rules that
9 will negatively impact BIDs and
10 undermine our collaborative
11 relationship.

12 The Garment District supports the
13 City's effort to reduce unsightly and
14 unsanitary garbage on our sidewalks and
15 rat mitigation. The new rules proposed
16 by DSNY are prejudicial in that they
17 unfairly target BID districts with a
18 burdensome cost to do the City's work,
19 while non-BID areas are unaffected.

20 This ploy smacks of opportunism and
21 the lack of respect for the intended
22 purpose of a public/private partnership.

23 The Garment District voluntarily
24 provides supplementary neighborhood
25 sanitation services to the City's

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 existing municipal DSNY service. It is
2 clearly stated in our contract with the
3 City that the City cannot reduce
4 services in BID districts unless it's
5 being reduced citywide.

6 It's an affront to require the BID
7 businesses and property owners to
8 privately pay for standard DSNY
9 containers that are otherwise provided
10 throughout the rest of the City. A BID
11 may opt, at its own cost, to provide
12 non-standard waste receptacles, but we
13 cannot pay for City receptacles or face
14 penalties for not providing them.

15 The GDA objects to undertaking
16 responsibility for mapping locations of
17 the proposed shared containers, but we
18 welcome working with DSNY on the siting.

19 We strenuously object to the
20 proposal that we would face fines for
21 leaving bags of garbage on street
22 corners for DSNY collection. The
23 contents of the bags that we place on
24 corners are publicly generated street
25 litter that GDA sweeps up at the

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 discretion of our Board to improve the
2 neighborhood.

3 In meetings with DSNY, we have been
4 assured that they do not or you do not
5 intend to egregiously impose fines. If
6 that is the case, then please remove
7 that potential sanction from the rules.

8 Like all BIDs, we want clean
9 streets. We currently spend
10 five-and-a-half million dollars a year
11 on sanitation, supplying labor,
12 equipment, and bags to have public waste
13 removed from the City's waste
14 receptacles and carted away.

15 The neighborhood benefits, but so
16 does the City, and the tens of thousands
17 of commuters and tourists who are
18 passing through daily. This service is
19 provided at the discretion of the Board
20 of Directors which understands and
21 values the importance of cleanliness.

22 To turn this voluntary contribution
23 towards making a City better -- our City
24 better -- into a punishable requirement
25 is unconscionable and a contract

1 violation.

2 Thank you for the opportunity to
3 testify.

4 MS. LIGUORI: Thank you very much.

5 And someone just asked in the
6 comments, if you would like to testify,
7 you may indicate so in the chat. You
8 will be added to the list.

9 The next person to testify is James
10 Martin, the Executive Director of ACE.

11 MR. MARTIN: Good morning. My name
12 is Jim Martin. I'm the Executive
13 Director of ACE New York.

14 I'd just like to quickly acknowledge
15 the men and women who staff our City
16 BIDs and supplemental sanitation
17 providers like ACE. These are the folks
18 that are doing this work every day and I
19 commend them for that work.

20 As you know, ACE partners with the
21 City Council each year to provide
22 supplemental sanitation services in over
23 40 council districts across the five
24 boroughs. We remove in excess of one
25 million full garbage bags a year from

1 City streets.

2 I testify today to express our
3 strong opposition to the proposed policy
4 prohibiting supplemental service
5 providers, like ACE, from placing
6 collected garbage bags next to DSNY
7 public waste receptacles so that DSNY
8 trucks can collect them.

9 This policy part of our City's
10 containerization initiative will
11 significantly impact ACE's ability to
12 provide essential supplemental
13 sanitation services in our great city.

14 After consulting with DSNY, we have
15 learned that the proposed policy will
16 require ACE, a nonprofit, to adopt one
17 or two expensive solutions to adhere or
18 receive punitive fines beginning August
19 1st.

20 Our options will be to either
21 purchase and install permanent trash
22 containers -- CITIBINS -- to store full
23 garbage bags for DSNY removal or to
24 purchase garbage trucks -- a fleet of
25 them -- to remove bags from the street

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 because these containers and garbage
2 trucks would be ACE's responsibility --
3 or the responsibility of the City
4 Council, the folks who fund ACE every
5 year for supplemental sanitation
6 services in their district.

7 An analysis has revealed that in
8 order to comply with this policy, ACE, a
9 nonprofit, would need to purchase and
10 install in excess of 230 containers at
11 an estimated cost between four and five
12 million dollars all over the City, in
13 all five boroughs.

14 We estimate the cost of purchasing,
15 ensuring, and staffing a fleet of
16 garbage trucks to service all ACE
17 routes, seven days a week, 352 days a
18 year, would exceed four-and-a-half
19 million dollars.

20 ACE is unable to afford these
21 expenses, and should these expenses be
22 passed on to our City Council partners,
23 the expense would basically eliminate
24 any ACE sanitation allocations,
25 resulting in the elimination of ACE

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 sanitation services in most, if not all,
2 council districts that we currently
3 serve.

4 Ultimately, the burden of this
5 policy may result in ACE closing its
6 doors after 33 years of service to New
7 York City, both as a workforce
8 development program and a very well
9 regarded supplemental sanitation
10 provider -- meaning, 165 men and women
11 who staff our sanitation crews will lose
12 their jobs.

13 These men and women have overcome
14 homelessness, incarceration, and
15 addiction, and the job that this
16 partnership has created has given them a
17 lifeline to help them begin their
18 journey towards economic independence.

19 In closing, the extraordinary
20 financial burden and additional
21 responsibilities that come with
22 containerization will severely impede
23 ACE's ability to do the supplemental
24 sanitation work that we have long done
25 in partnership with the City Council.

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 Make no mistake, this policy is an
2 existential threat to our organization,
3 the men and women that we serve, and
4 will result in more trash on City
5 streets, not less.

6 ACE is truly grateful for our
7 long-standing partnership with DSNY and
8 the City Council. We share great pride
9 in the work that we have done over the
10 last 10 years and we hope to do more.

11 I urge the Department of Sanitation
12 to not allow containerization to put an
13 end to our good work. Thank you.

14 MS. LIGUORI: Thank you very much.

15 The next up is Mark Dicus from the
16 Fifth Avenue BID.

17 MR. DICUS: Hi. Good morning. My
18 name is Mark Dicus. I'm the Vice
19 President of Operations and Planning at
20 the Fifth Avenue Association.

21 Thank you for holding this hearing
22 today on the proposed DSNY rules that
23 would require BIDs starting on August 1,
24 2025 to place public litter bags of
25 garbage in rigid containers to be

1 collected by Department of Sanitation or
2 a private carting company.

3 The Fifth Avenue Association
4 currently handles over 40,000 bags of
5 garbage per year that come from our
6 public litter baskets.

7 We share the City's goal of getting
8 bags off the street and we are eager to
9 work in partnership with Sanitation to
10 achieve that goal. However,
11 implementing these changes are
12 significant and call for the investment
13 of tens of thousands of dollars of
14 materials and staff time to implement.

15 Since the Council hearing in
16 November on this topic, Association
17 staff have begun preparing for the end
18 of the decades' long practice of placing
19 bags of public litter basket waste next
20 to public trash receptacles for
21 collection.

22 We start -- started collecting and
23 mapping bag count data. We've
24 considered a variety of different
25 solutions ranging from different

1 container options to changes to our
2 collection operation.

3 We started to think about how many
4 and the size containers needed,
5 potential locations where we might be
6 able to site them in the public space;
7 considered operational changes that
8 would be needed, and estimated -- beyond
9 estimating the cost to implement these
10 changes.

11 Last week, we had a very productive
12 meeting with Department of Sanitation to
13 learn how the agency is able to help
14 BIDs implement these changes and come
15 into compliance with these proposed
16 rules.

17 But we share this goal. We need the
18 City's continued partnership to
19 implement these changes to achieve these
20 important shared goals. To accelerate
21 compliance, here's how the City --
22 here's how the City could help:

23 To accelerate compliance, the City
24 should provide funds to bring down the
25 cost -- or make these no cost -- to

1 purchase containers for small and medium
2 sized BIDs and work with BIDs to
3 implement lower cost solutions.

4 The City needs to provide more
5 assistance when it comes to siting
6 containers in their district. The
7 siting guidelines are currently too
8 rigid. They need to be more flexible on
9 where containers can be sited in the
10 public realm.

11 For example, the guidelines for the
12 Clean Curbs program prohibit siting of a
13 container in lane used as travel lanes,
14 for example, curb lanes that are used as
15 parking and travel lanes using no
16 standing parking regulations at
17 different times of day. In our
18 district, no standing parking lane
19 regulations remove several blocks as
20 potential container sites.

21 In meeting with the City, we learned
22 that there may be some flexibility with
23 this guideline, which would be
24 enormously useful.

25 We also need the partnership of DOT

1 to clarify the approval process and
2 streamline it so that sites are approved
3 in a timely manner.

4 August 1st is less than six months
5 away and the final rule has not yet been
6 adopted. Six months is an insufficient
7 amount of time to plan and implement
8 these transformational, important
9 changes.

10 Please push out the deadline by a
11 year or two to give BIDs sufficient lead
12 time to plan for and implement solutions
13 that comply with these requirements.
14 This would take pressure off both BIDs
15 and the City to implement solutions that
16 are rushed and incomplete to achieve
17 this important shared goal.

18 Thank you for considering this
19 testimony.

20 MS. LIGUORI: Thank you very much.

21 Next is Layla Passman from the
22 Atlantic Avenue BID.

23 MS. PASSMAN: Hello. I'm Layla
24 Passman. I'm the Community Engagement
25 Coordinator for the Atlantic Avenue BID.

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 The Atlantic Avenue BID represents
2 over 300 businesses along Atlantic
3 Avenue and the side streets in the
4 Brooklyn neighborhoods of Brooklyn
5 Heights, Cobble Hill, Boerum Hill, and
6 Downtown Brooklyn.

7 We urge the committee not to adopt
8 this text amendment, as it puts the
9 function of all BIDs in peril. Business
10 improvement districts are independent
11 non-profits that report to Board of
12 Directors.

13 The Atlantic Avenue BID has an
14 annual budget of \$390,000, a third of
15 which goes to a sanitation contractor
16 who provides services and supplement to
17 DSNY. Our contractor does the work that
18 DSNY cannot do because the agency has
19 limited capacity and funding.

20 If we were -- if we were to use our
21 budget to comply with this text
22 amendment, we would have to cut from all
23 of our other services. This would mean
24 no lights during the holidays, no open
25 streets programs, and little support for

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 our small businesses, all so that our
2 trash bags will be filled with the
3 public trash and not be subjected to
4 fines.

5 As a result, our organization may
6 need to stop sanitation services
7 altogether, falling out of line with our
8 mission and causing trash to take over
9 our corridor. Our organization simply
10 does not have the funds to execute and
11 maintain this compliance.

12 In addition to the strain on the
13 BIDs' capacity, this mandate would be
14 logistically impossible for our
15 organization. The proposed rules do not
16 specify how to containerize the trash
17 and which bins we're supposed to use.

18 In addition, siting these bins would
19 cause major issues. Not only do we not
20 have the funds to purchase the bins for
21 the corridor, but we also don't have the
22 place for the bins and they're -- the
23 bins that we do have are constantly
24 being stolen and they need to be
25 replaced very often.

1 So, even if the fining penalty were
2 eliminated, the burden of compliance
3 would weigh too heavily on our
4 organizations.

5 BIDs -- BIDS have been strong
6 partners of the City and have helped
7 make New York a desirable place to live,
8 work, and shop, and to penalize BIDs for
9 doing the work that DSNY cannot do is a
10 betrayal of the fruitful relationship
11 between BIDs and the City of New York.

12 If the goal of this amendment is to
13 curb rat populations on our City
14 streets, let's work together to
15 accomplish it by designating set-out
16 times and using the new residential
17 containers.

18 Thank you.

19 MS. LIGUORI: Thank you.

20 Next we have is Ben Ackert, the
21 Senior Manager, Operations Planning for
22 the Downtown Alliance.

23 MR. ACKERT: Hi -- here.

24 Good morning, chiefs and Sanitation
25 Department staff. I'm Ben Ackert,

1 Senior Manager in Operations at the
2 Downtown Alliance.

3 The Downtown Alliance BID is roughly
4 the area south of Brooklyn Bridge to the
5 Battery from West Street to the East
6 River. The district is the City's
7 second largest central business
8 district.

9 Today, it is home to nearly 90
10 million square feet of commercial real
11 estate, over 230,000 private sector
12 employees, 67,000 residents, nearly
13 1,100 storefront businesses, and over 9
14 million visitors annually.

15 Given these sizable figures, the
16 district generates significant waste
17 daily. In fiscal year '24 we collected
18 over 1,000 tons of trash and over 324
19 tons of recyclables. Between the 178
20 Bigbelly trash compactors and the trash
21 cleaned up by our street sweepers, our
22 sanitation crew is managing nearly 600
23 bags a day.

24 The Alliance has long advocated for
25 the City to better manage its waste and

1 believes containerization is a positive
2 step forward in this effort.

3 In 2022, we were asked by then
4 Commissioner Tisch to pilot the
5 containerization of public trash in
6 partnership with the Department. By
7 November of 2023, we sited six CITIBIN
8 containers, with DOT approval, and began
9 to operate our trash collection fully
10 containerized in collaboration with
11 DSNY.

12 Since then, DSNY has provided
13 pick-up service to the bins three times
14 a day. This level of collection service
15 has been essential for us to be able to
16 do our work and be successful. If this
17 schedule were to be disrupted for any
18 reason, it would lead to serious
19 operational challenges that would make
20 it nearly impossible for the program to
21 function properly.

22 We do not have control over where
23 the bins are currently placed, nor can
24 approve new spots. Siting locations for
25 the current six containers was an

1 arduous task.

2 As you know, Lower Manhattan is a
3 narrow street grid that regularly
4 undergoes construction work and
5 development projects. That led us to
6 lose a site at one point and made it
7 quite challenging to find a new approved
8 location.

9 Despite the Department being very
10 helpful in this process, we know it
11 might not be possible to find new
12 locations. We are concerned that if
13 this were to happen again, the Alliance
14 would face punitive and operational
15 problems.

16 For the Alliance, trash
17 containerization can only function
18 properly and effectively with robust
19 cooperation and continued partnership
20 with the Sanitation Department -- and
21 that's the end of my statement.

22 MS. LIGUORI: Thank you very much.
23 Next person is Laura Rothrock from
24 the NYC BID Association.

25 MS. ROTHROCK: Good morning. My

1 name is Laura Rothrock and I'm
2 testifying today on behalf of the NYC
3 BID Association and I'm also the
4 Executive Director of the Long Island
5 City BID.

6 The BID Association represents all
7 of the City 76 BIDs, many of whom you've
8 heard from today.

9 We want to be clear at the outset
10 that we share the City's goal of getting
11 bags off the street, reducing the number
12 of rats, and containerizing garbage to
13 the greatest extent feasible, but we
14 oppose this proposed rule as draconian
15 and inflexible.

16 For over 40 years, BIDs have been
17 trusted partners to NYC and DSNY,
18 providing services, including
19 supplemental sanitation, to districts
20 that have been inadequately served by
21 the City due to scarce resources. This
22 includes the bagging and relining of
23 overflowing trash cans, which cannot be
24 emptied at a fast enough rate by DSNY.

25 BIDs collect and replace over 10,000

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 trash bags on an average day. While
2 some larger BIDs are able to haul those
3 bags to sanitation warehouses or are
4 moving towards containerization
5 voluntarily, most medium-sized and small
6 BIDs set those bags on the sidewalk for
7 DSNY pick-up.

8 Unfortunately, DSNY is now moving
9 ahead with the unfunded mandate being
10 considered at this hearing. While BIDs
11 are already partners in getting trash
12 off the street, these changes to our
13 operations would be financially
14 impossible for many BIDs.

15 There's also the complexity of
16 siting containers, which DOT and local
17 stakeholders -- with DOT and local
18 stakeholders. We remain deeply
19 concerned that an August 1st
20 implementation is still too soon for
21 many BIDs to operationalize these
22 changes.

23 The larger BIDs that have
24 voluntarily moved towards
25 containerization have needed years to do

1 so and it has been quite complex, as
2 you've heard today.

3 As for the proposed rule itself, it
4 gives no guidance on what types of
5 containers will be allowed, aside from
6 the 55 gallon bins, which will be wholly
7 inadequate -- and there's some confusion
8 about why there's a mention of those 55
9 gallon containers at all.

10 The proposed rule also does not
11 provide for any flexibility whatsoever.

12 If the ultimate goal is to reduce
13 rats -- a goal which we share -- why not
14 limit the times and hours that bags can
15 be left out for pick-up in close
16 coordination with DSNY. Wouldn't this
17 achieve the goal without the draconian
18 rule being considered today?

19 We ask DSNY to consider adding
20 flexibility to this rule so that more
21 BIDs can realistically comply.

22 Without additional flexibility and
23 financial support, there's a real
24 possibility that many BIDs will have no
25 choice but to cease supplemental

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 sanitation services altogether. In that
2 case, the City may not have nicely
3 tied-up bags on the street. It would
4 have overflowing trash cans along key
5 corridors across the City.

6 We remain committed to partnership
7 with DSNY and the City of New York, but
8 have found DSNY to have a lack of
9 understanding when it comes to how
10 quickly and easily we can operationalize
11 their goals.

12 This rule is particularly insulting
13 to partners that have worked to keep the
14 City clean, a job that DSNY cannot do
15 alone. If the City wants to get bags
16 off the street, they need to support
17 organizations financially and
18 operationally that do this work and not
19 introduce punitive measures which will
20 discourage and fine the very
21 organizations on the front-lines of
22 cleaning up New York City.

23 Thank you.

24 MS. LIGUORI: Thank you very much.

25 Next we have is Patricia Maltezos,

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 the Planning and Development Director of
2 the Hudson Yards Hell's kitchen
3 Alliance.

4 MS. MALTEZOS: Good morning. My
5 name is Patricia Maltezos, the Planning
6 and Development Director at the Hudson
7 Yards Hell's Kitchen Alliance, a BID in
8 West Midtown.

9 The Hudson Yards Hell's Kitchen
10 Alliance stands with our fellow NYC BID
11 partners in our frustration over DSNY's
12 process and attitude on containerization
13 laws as it applies to BIDs.

14 We have always considered ourselves
15 partners with the City. We all endeavor
16 to improve our various districts in both
17 physical and programmatic ways that are
18 specifically tailored to our
19 neighborhoods.

20 We support small businesses
21 throughout the five boroughs, plant
22 trees, create public art, organize free
23 public events, and much more.

24 Supplemental sanitation is the most
25 important part of that program. Our

1 communities thrive thanks to clean
2 sidewalks.

3 Users of our neighborhoods often
4 mistakenly think that the City takes
5 care of the sidewalk trash, but it is
6 the BIDs who do this work every day.

7 This new law, with its current
8 expediated (sic) timeline, is not built
9 for partnership. While HYHK supports
10 the idea of containerizing trash, we
11 cannot do this in the dark.

12 The lack of process so far has
13 forced BIDs to make decisions quickly,
14 without the time to consider future
15 ramifications on operations, budget,
16 staffing, and street-scape. At this
17 point, we are being forced to comply
18 with the program with no monetary
19 resources and very little written
20 guidance.

21 HYHK staff have been working to
22 pilot a container in one location with
23 the hope of expanding the program
24 throughout the district. We applied for
25 one container in July and had that

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

67

1 approved six months later.

2 How can DSNY expect all BIDs to
3 containerize by August if it takes six
4 months to get one location? It takes
5 time to work through the staffing
6 issues, plan for fluctuations in trash
7 volume, understand complex on the ground
8 realities, and balance all of the needs
9 of other amenities in the public space.

10 DSNY is punishing us for the work we
11 do. BIDs clean up public trash -- not
12 trash that we create -- trash that the
13 public creates and throws on the
14 sidewalk.

15 We request a reset so that BIDS and
16 DSNY can move forward again as partners.

17 Thank you.

18 MS. LIGUORI: Thank you.

19 Next up is David Estrada, the
20 Executive Director of the Sunset Park
21 5th Avenue BID.

22 MR. ESTRADA: Hello -- yes, thank
23 you.

24 My name is David Estrada. I'm the
25 Executive Director of the Sunset Park

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

68

1 BID.

2 I'd like to echo the comments that
3 were made by previous BID members, but I
4 do want to point out a couple of other
5 things.

6 I serve Sunset Park, a 26-block
7 stretch of 5th Avenue in Brooklyn
8 between 38th and 64th Street. We have
9 an inordinate amount of illegal dumping
10 and this is totally out of our
11 control -- and even -- and even with
12 containers on the street, we would need
13 much more --

14 MS. LIGUORI: Mr. Estrada, you cut
15 out.

16 (No response.)

17 MS. LIGUORI: Mr. Estrada?

18 (No response.)

19 MS. LIGUORI: Okay. We are going to
20 move to the next speaker and we'll come
21 back to Mr. Estrada in a few minutes.

22 The next is Jeffrey LeFrancois, the
23 Executive Director of the Meatpacking
24 District Management Association.

25 MR. LeFRANCOIS: Thank you and good

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 morning. My name is Jeffrey LeFrancois,
2 Executive Director of the Meatpacking
3 District Management Association.

4 We're the BID charged with
5 maintaining New York City's premier
6 cultural district for 50,000 plus daily
7 visitors, workers, and residents on
8 Manhattan's Lower West Side.

9 Our sanitation team supplements
10 DSNY's work by servicing over 100 waste
11 receptacles, sweeping 92 block bases,
12 and setting up to up to 400 public bags
13 of trash for DSNY collection every day.
14 As a result of this hard work, over 60
15 percent of public survey respondents
16 cite cleanliness as a key positive
17 feature of the neighborhood.

18 While the BID believes trash
19 containerization is a positive step in
20 New York street-scape revolution, this
21 rule shows an inadequate understanding
22 of BID operations, lacks interagency
23 coordination, and is a short-sighted
24 approach to containerization.

25 It is troubling that DSNY proposed

1 this rule without any engagement with
2 BIDs or input from City agencies that
3 will have intersecting jurisdiction with
4 this program.

5 The rule is punitive and places a
6 significant undue operational burden on
7 DSNY partners without providing any
8 policy, permitting, and financial
9 support necessary to transition to
10 containerizing waste.

11 DSNY must address the following
12 issues with curb containerization
13 program before any penalizing rule is
14 adopted:

15 Provide a list of DSNY approved
16 containerization products; allow for
17 bags to remain on-street for short
18 periods to facilitate centralization of
19 trash management by BID staff; ensure
20 procurement can adhere to a standard
21 policy or develop a procurement
22 exception with SBS; reduce the
23 administrative burden for BIDs applying
24 to participate in the Clean Curbs
25 program; and establish a clear process

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

71

1 for additional agency review to ensure
2 other agencies do not hold up
3 applications.

4 The meatpacking district is not
5 objecting to this rule capriciously, but
6 instead due to substantive concerns
7 related to effective implementation.
8 DSNY should focus its efforts on
9 demonstrating a viable containerization
10 pilot and supporting the transition and
11 waste collection by identifying
12 container locations and buying the
13 products.

14 DSNY should also support BIDs with
15 funds to acquire containers or procure
16 containers directly to support this
17 program.

18 The supplemental cleaning services
19 that BIDs provide are exactly that --
20 supplemental to DSNY's work. The trash
21 collection comes -- the trash collected
22 comes from people of New York and
23 visitors walking our streets, shopping,
24 dining, and making a living in our city.
25 If DSNY wishes to implement this policy,

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 it should consider, at a deep respect,
2 the partners that help keep our streets
3 clean.

4 Meatpacking BID looks forward to
5 being a part of the process that best
6 addresses the needs of the City to
7 containerize our trash. This rule will
8 certainly not achieve that.

9 Thank you.

10 MS. LIGUORI: Thank you very much.

11 The Next we have is Dan Scorse, the
12 Vice President of Operations for the
13 Hudson Yards Hell's Kitchen Alliance.

14 MR. SCORSE: Good morning. Thank
15 you.

16 My name is Daniel Scorse, Vice
17 President of Operations, the Hudson
18 Yards Hell's Kitchen Alliance, also
19 known as HYHK. Thank you for allowing
20 me to speak today.

21 BIDs partner with many City
22 agencies, such as DOT, Sanitation, NYPD,
23 and Parks, among others. A year ago, if
24 you had asked me which of these agencies
25 we had the best relationship with, I

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 would have said Sanitation. We both
2 want the same thing -- clean streets --
3 and we've helped each other achieve that
4 goal for years.

5 Unfortunately, this rule threatens
6 that partnership and may, ironically,
7 result in dirtier streets.

8 HYHK supports getting bags off the
9 street and we feel that containerization
10 is the answer. In fact, HYHK
11 containerized some public space trash 10
12 years ago and it has been great.
13 However, due to funding and siting
14 restrictions, we have not containerized
15 all the trash we handle.

16 As my colleague mentioned, it took
17 sanitation six months to approve one
18 container location. We may need 20
19 containers for full coverage.

20 When a restaurant containerizes its
21 trash, it does it for one location.
22 When a residential building
23 containerizes, it's for one location.
24 BIDs, on the other hand, cover vast
25 swaths of the City, including the

1 busiest parts. It's a tremendous
2 undertaking.

3 If any other agency were rolling out
4 a change this dramatic, it would be an
5 iterative process with planning
6 meetings, pilot programs, and phase
7 implementation. Although Sanitation
8 likes the idea of a BID containerization
9 pilot program, they claim to have no
10 time or money for it. What's the rush?

11 I encourage Sanitation to take a
12 deep breath and rethink this important
13 program.

14 Thank you.

15 MS. LIGUORI: Thank you.

16 Next up we have is Corey Kunz, the
17 Senior VP of the Hudson Square BID.

18 MR. KUNZ: Hi. Good morning. I'm
19 Corey Kunz, the Senior Vice President at
20 the Hudson Square Business Improvement
21 District.

22 Since 2009, HS BID has overseen the
23 transformation of Manhattan's former
24 printing district into a thriving
25 creative hub. The area we manage is

1 generally bounded by parks and streets
2 in the north, 6th Avenue in the east,
3 Canal Street in the south, and West
4 Street in the west.

5 While we understand and support the
6 public policy to get bags off the
7 street, and have actively participated
8 in the Clean Curbs program to reduce
9 bags in our district, we are concerned
10 with the financial and operational
11 burdens this rule will put on -- will
12 put on BIDs.

13 BIDs are independent nonprofit
14 organizations that report to a Board of
15 Directors. Each individual BID's
16 services and budgets are written into a
17 legislatively approved district plan
18 that takes multiple years to alter.

19 In our case, our district plan does
20 not include supplemental sanitation in
21 its list of core services provided to
22 the community. We implemented
23 supplemental sanitation services in key
24 neighborhood corridors during the
25 COVID-19 pandemic to keep our district

1 attractive and welcoming as we were
2 trying to lure office workers and
3 visitors back to the neighborhood.

4 This program has continued under the
5 explicit direction of our Board of
6 Directors and could be halted at their
7 discretion.

8 We estimate that the cost of
9 compliance with this rule to be over
10 \$150,000 in start-up costs alone, with
11 significant annual operational costs not
12 anticipated in our 10-year budget
13 projections. The financial penalties
14 for violation, \$400 after the third
15 offense in one year, are a significant
16 cost and burden for a nonprofit to
17 absorb.

18 In addition, it is wholly
19 inappropriate to issue fines to City
20 partners that provide supplemental
21 services and have existing contracts
22 with the City.

23 The timing of this requirement is
24 particularly concerning, as our central
25 business district is finally recovering

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 from the economic decline caused by
2 COVID-19. Pedestrian traffic is
3 currently increasing as we welcome new
4 major office tenants to the district.
5 With more foot traffic also comes more
6 public garbage.

7 While we support and appreciate the
8 importance -- the important goal of
9 containerization, it is unfair to burden
10 BIDs with the full cost and penalty of
11 containerizing public trash in our
12 commercial district.

13 As always, we are ready to help move
14 the City towards the goals of
15 containerization, but we must convey our
16 deep concern with this rule.

17 Thank you.

18 MS. LIGUORI: Thank you very much.

19 The next up I have is Cordelia
20 Persen, the Executive Director of the
21 NoHo BID.

22 MS. PERSEN: Hi. My name is
23 Cordelia Persen. I'm the Executive
24 Director of the NoHo bid, like she just
25 said.

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 My BID was formed 27 years ago to
2 clean up NoHo and we've been doing
3 supplemental sanitation ever since.

4 The NoHo BID believes in
5 containerization in principle, and over
6 the past few years we have spent time
7 and financial resources implementing
8 containerization in parts of our
9 district for public corner can waste.

10 What we're concerned about is being
11 forced by DSNY to fully comply with
12 containerization requirements in such a
13 short time with no financial assistance
14 from the City. We are one of the
15 smallest BIDs in Manhattan and manage a
16 significant amount of trash that ends up
17 on our busy streets, from corner trash
18 to illegal dumping, to individuals
19 ripping up properly set-out garbage.
20 There's never a short supply of garbage
21 to deal with.

22 We've been slowly containerizing and
23 have been adding two CITIBINs per fiscal
24 year since FY '22. However, we still
25 have a ways to go before all our trash

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 is containerized.

2 Even now to deal with all the corner
3 can trash, the BID would likely have to
4 spend more than \$60,000 or 10 percent of
5 our annual budget.

6 BIDs were formed to do supplemental
7 sanitation, which means bagging up
8 pedestrian garbage on -- from corner
9 cans to prevent overflow and help DSNY
10 with their overall goal of keeping trash
11 off the street. Since it's the City
12 garbage and a City initiative, I feel
13 like the City should be providing
14 funding to implement the program.

15 Unless we get more funding, my Board
16 of Directors has voted to pull corner
17 cans from areas that we don't have
18 enough capacity in whichever CITIBINS we
19 get sited by the deadline.

20 Another problem in the program is
21 that in the first round of the Clean
22 Curbs pilot -- the first time we put
23 stuff out -- DSNY handled notification
24 for property owners. In this last
25 version -- or the latest version, BIDs

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 are supposed to do the notification
2 ourselves.

3 Since this is a City program and
4 this -- we -- I believe the City should
5 do the notification versus making BIDs
6 have a contentious conversation with
7 property owners we represent when we
8 have limited control over siting
9 locations.

10 On that note, siting and placement
11 is definitely a challenge in my
12 district, and to make this program work,
13 I believe DSNY and DOT will need to be
14 more flexible and responsive to each
15 district's individual street-scape.

16 Lastly, my BID has learned a lot
17 about what locations work and how to
18 best roll-out the program in our
19 district because we had time to
20 implement it a little bit over time and
21 make sure we were placing the correct
22 locations where the correct capacities.

23 I think setting up an August 1st
24 deadline for all containerization will
25 lead to a program that -- not -- that is

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

81

1 not being implemented in the best way
2 possible for DSNY. I recommend it being
3 implemented over a longer time period.

4 Thank you.

5 MS. LIGUORI: Thank you very much.

6 The next we have is Lauren Elvers
7 Collins, the Executive Director of the
8 Church-Flatbush Community Alliance.

9 MS. ELVERS COLLINS: Hi. Thank you.
10 Good morning. This is -- yes -- Lauren
11 Elvers Collins, the ED at the
12 Church-Flatbush Community Alliance.

13 We serve small businesses and
14 properties on more than one-and-a-half
15 miles of Flatbush Brooklyn. Garbage is
16 a huge problem, as it is for many of us,
17 but forcing partners like BIDs to spend
18 their own funds to take over keeping
19 bags of public trash off the street --
20 part of a service that the City should
21 be providing -- will take needed
22 services away from our community.

23 We definitely appreciate the hard
24 work that DSNY does every day toward
25 keeping our City clean and we're glad to

1 supplement that effort -- and really
2 shout-out to AK-14, which is such a
3 great garage. They really support us.

4 Several years ago, we were part of
5 DSNY's Clean Curbs pilot program under
6 which the City paid for three containers
7 for us, which our three-person
8 supplemental crew fills every day with
9 bags of public trash that we gather from
10 litter baskets.

11 We already spend about \$255,000 a
12 year on supplemental sanitation, which
13 is 42 percent of our annual assessment.
14 That's a very big chunk of the money
15 that we have -- plus an estimated 30
16 percent of staff time of our
17 three-person staff is dedicated to
18 addressing sanitation issues and
19 collaborating with Sanitation officials,
20 our property and business members, and
21 the community to try to make a cleaner
22 neighborhood.

23 The rest of our efforts go into
24 creating free community events,
25 promotion and marketing for our

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 businesses, small business support, and
2 safety and quality of life programs.

3 If DSNY were to implement this rule,
4 we'd be faced with several possible
5 options. Storing bags in large
6 on-street containers has been mentioned
7 by other people on the call -- hauling
8 bags and ending service.

9 The first two of the options are
10 cost prohibitive for us. For us, adding
11 four new containers that we would need
12 would cost over \$40,000, plus the cost
13 of ongoing maintenance, which would
14 force us to drop some community events
15 and services.

16 This is -- four containers for us
17 would be a minimum. It would still mean
18 fewer times that our guys could go up
19 and down the street because they will be
20 bringing things to the -- to the
21 containers.

22 And as a side note, we've had
23 multiple conversations with the two
24 primary container services, CITIBIN and
25 metroSTOR -- and we also have several

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 years of experience using and
2 understanding the real life capacity of
3 these containers. And, respectfully,
4 the cost of the containers that has
5 sometimes been mentioned by DSNY is
6 simply not accurate and understates what
7 actually would be needed for us to do
8 what's being asked.

9 The final idea that would come out
10 of the rule of ending service would
11 definitely damage the quality of life in
12 our neighborhood.

13 Instead of imposing this rule, what
14 we would love to see is DSNY adding
15 pick-up times to the commercial
16 corridors that need it and working with
17 each BID directly to find a solution
18 that the BID -- that that BID can
19 achieve without forcing us to remove
20 services which our community -- our
21 communities rely on.

22 If containerization is required,
23 BIDs should be provided with containers
24 at no cost to us, and siting should be
25 made much easier than what we're

1 possibly looking at now.

2 Penalizing BIDs and similar groups
3 who are already dedicating money and
4 time to do the City's job of keeping our
5 streets clean is unfair and ignores the
6 negative impact this would have on our
7 communities.

8 We urge DSNY to put this proposed
9 rule aside and to instead work with each
10 of us as partners to find a solution
11 that's feasible for each BID.

12 Thank you so much.

13 MS. LIGUORI: Thank you.

14 The Next we have is Kalvis
15 Mikelsteins, the VP of Planning and
16 Operations for the Dumbo Improvement
17 District.

18 MR. MIKELSTEINS: Thank you. Good
19 morning, everyone. My name is Kalvis
20 Mikelsteins from the Dumbo BID. Thank
21 you for the opportunity to testify on
22 behalf of our BID.

23 We provide essential sanitation
24 services, including bagging public
25 trash, to keep streets clean for

1 residents, workers, and visitors.

2 I want to state upfront that we are
3 in alignment with the goal of the DSNY
4 of beautifying our streets through the
5 removal of trash. However, the proposed
6 Sanitation rule raises significant
7 concerns for our organization, as well
8 as other BIDs. We seek a constructive
9 dialog to address these issues while
10 achieving our shared goals.

11 BIDs are independent non-profits
12 with budgets and contracts outlined in
13 district plans and through agreements
14 with NYC Small Business Services. Since
15 we cannot adjust assessments without a
16 lengthy process, many BIDs struggle to
17 adapt to new financial burdens, such as
18 those imposed by this rule.

19 While the rule claims to minimize
20 compliance costs, it fails to consider
21 the true financial impact. BIDs were
22 not consulted about the costs of
23 compliance, which could reach hundreds
24 of thousands of dollars in start-up
25 expenses alone, potentially diverting

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 funds from other essential services.

2 Moreover, siting these bins will be
3 a lengthy effort with the Department, as
4 well as NYC DOT who govern the curb.
5 For containerization to move forward, we
6 need there to be dedicated staff and
7 guaranteed -- guaranteed approval
8 timelines for the siting.

9 The rule also includes fines for
10 BIDs, which already provide supplemental
11 sanitation services for the City. These
12 fines are intended for noncompliance,
13 but the trash being bagged is public
14 waste; not BID specific. Imposing fines
15 on BIDs efforts to fill a gap left by
16 the City feels unjust.

17 Despite amendments clarifying that
18 individuals won't be fined, BIDs will
19 still bear the compliance burden, which
20 could lead to confusion, inefficiency,
21 and costly penalties.

22 Further, the rule lacks clarity on
23 the types of containers BIDs should use
24 for trash bagging. While DSNY suggests
25 wheelie-bins and large containers, the

1 rule only references containers up to 55
2 gallons, causing uncertainty.

3 We recommend exploring designated
4 time periods for trash and recycling
5 placement and coordinating with DSNY on
6 pick-up schedules to minimize rat
7 attraction. This could align with
8 residential containerization efforts,
9 providing a cost effective solution.

10 We understand the importance of
11 maintaining clean streets and tackling
12 sanitation challenges, but the proposed
13 rule change doesn't account for BIDs'
14 limitations, nor does it offer any
15 workable solutions.

16 We ask you to consider the financial
17 impact, practicality of compliance, and
18 the broader consequences for BIDs. We
19 remain committed to collaborating with
20 DSNY and other stakeholders to develop a
21 fair, realistic, and sustainable
22 solution.

23 Thank you for your attention to
24 these issues. We look forward to
25 further discussions to ensure that the

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

89

1 new sanitation requirements are
2 equitable and feasible.

3 MS. LIGUORI: Thank you very much.

4 The next we have is Cate Byrne on
5 behalf of the Office of Council Member
6 Aviles.

7 MS. BYRNE: Thank you so much.

8 Good morning, everyone. Thank you
9 so much all DSNY staff for taking the
10 time to hear our concerns today about
11 proposed amendments to DSNY's
12 containerization policies. We really
13 appreciate your attention this morning.

14 I will be reading on behalf of
15 Council Member Alexa Aviles who
16 represents District 38 in Brooklyn.

17 As a local-elected official for
18 District 38, I recognize the importance
19 of tackling litter and rat
20 overpopulation, both of which could be
21 mitigated through proper
22 containerization. However, the
23 Administration's proposed requirement
24 that all entities use containers for
25 collection services will be detrimental

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

90

1 and will, therefore, harm the sanitation
2 efforts within our community.

3 DSNY's proposed amendment seeks to
4 resolve a significant problem in our
5 City, but does not take into account the
6 needs of nonprofit stakeholders.

7 We do look forward to working with
8 the City and Council on a solution to
9 containerization that does not put the
10 majority of the financial burden on our
11 non-profits, as you believe, what would
12 happen with this amendment.

13 I will leave out some of the more --
14 more of the details and statistics that
15 are included in the written submitted
16 testimony in the interest of time.

17 But, we respectfully request DSNY
18 consider the negative impacts of this
19 amendment on hardworking non-profits,
20 merchant associations, and neighborhood
21 efforts that make it possible for us to
22 keep our streets clean.

23 Without a clear explanation and
24 solution for how BIDs and other partners
25 will be expected to comply with this

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

91

1 rule without it significantly cutting
2 into their financial capacity, the
3 proposed benefits of these
4 containerization policies are slim
5 compared to the financial damage these
6 regulations do induce.

7 We are happy to engage in continued
8 conversations with DSNY, DOT, LPC, and
9 PDC about long-term solutions to
10 containerization that do not financially
11 harm non-profits who are already at
12 limited capacities.

13 Thank you for attention to the
14 Department matter and we have submitted
15 a longer written testimony.

16 Thank you.

17 MS. LIGUORI: Thank you very much.

18 Next we have is Daniel Bernstein,
19 the Executive Director of the
20 Columbus-Amsterdam Business Improvement
21 District.

22 MR. BERNSTEIN: Yes -- thank you. I
23 appreciate it.

24 Hello, everybody. My name is Daniel
25 Bernstein. I've been the Executive --

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

92

1 I'm currently the Executive Director of
2 the Columbus-Amsterdam BID.

3 I want to, first of all, thank DSNY
4 for allowing me to testify and for their
5 hard work daily keeping New York City
6 clean.

7 New York City BIDs vary greatly in
8 size and budget. Our BID, which is a
9 local community development nonprofit,
10 has been in operation since 1987 and our
11 boundaries cover both Columbus and --
12 sorry -- Amsterdam Avenues from West
13 96th Street to West 110th Street, the
14 Bloomingdale neighborhood of Manhattan.

15 We provide programs and services
16 that are aimed at making our
17 neighborhood cleaner, safer, and more
18 prosperous. Our sanitation team is
19 comprised of six part-time employees,
20 three of which are deployed daily, to
21 sweep the streets and change the trash
22 liners in the bin.

23 I have worked in New York City BIDs
24 for almost 30 years and BID sanitation
25 services are essential to New York City

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 neighborhoods because, as we all know,
2 Department of Sanitation and the City
3 cannot clean the sidewalks on its own.

4 Local community development
5 organizations, like BIDs, throughout New
6 York City, pick-up the major slack of
7 New York City and its agencies to make
8 the City a more attractive place for
9 visitors and residents alike.

10 These new rules will force many
11 community groups, like us, to
12 significantly alter and/or suspend our
13 existing sanitation services due to the
14 overwhelming financial constraints this
15 rule is causing. This will result in
16 overflowing trash receptacles, dirty
17 sidewalks, and dumping.

18 The City is planning to fine
19 organizations like us for doing their
20 job, bagging public trash -- not BID'er
21 commercial trash -- public trash. This
22 does not make any sense, as it is the
23 work of groups like ours that make the
24 City look great daily.

25 We urge DSNY and the City to revisit

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 these rules and implementation dates so
2 that we can work together to make New
3 York City cleaner.

4 Thank you.

5 MS. LIGUORI: Thank you very much.

6 Next we have is James Ellis, the
7 Executive Director of the North Flatbush
8 Avenue BID.

9 MR. ELLIS: Hi. Thank you. I
10 Appreciate the time this morning -- the
11 opportunity to share this testimony
12 today.

13 My name is James Ellis and I serve
14 as the Executive Director for the North
15 Flatbush Avenue Business Improvement
16 District, an organization serving Park
17 Slope and Prospect Heights in Brooklyn
18 since 1986.

19 While my testimony may echo
20 sentiments and realities expressed by my
21 colleagues, I feel compelled to voice
22 our deep concerns about the proposed
23 DSNY containerization mandate.

24 As one of the 76 BIDs in New York
25 City, and as a nearly 40-year-old

1 organization providing essential
2 supplemental services in our
3 neighborhoods, we have long prided
4 ourselves on being a trusted partner to
5 the City, its administrators, and
6 agencies. However, this recent mandate
7 has left us profoundly disappointed with
8 the City's approach to partnership and
9 collaboration.

10 The BID model was created -- as
11 created more than 40 years ago, speaks
12 to partnership with supplemental
13 services. This DSNY initiative is
14 contrary to the language and intent of
15 the original legislation. It removes
16 the spirit of shared stewardship and
17 governmental cooperation that the BIDs
18 agreed to be a part of. Together, we
19 can improve everyday life in New York
20 City.

21 The lack of substantive consultation
22 with BIDs before implementing this
23 mandate reveals a troubling disconnect
24 between policy-making and operational
25 reality. This top-down approach fails

1 to recognize several critical issues.

2 The financial feasibility:

3 Despite DSNY's certification that
4 this rule minimizes compliance costs for
5 the discrete regulated community, the
6 reality is starkly different. As
7 independent non-profits reporting to
8 Boards, our services and budgets are
9 carefully outlined in our district plans
10 and SBS contracts. This mandate could
11 require tens of thousands of dollars in
12 start-up costs with significant annual
13 maintenance expenses that our already
14 strained budgets cannot accommodate.

15 Importantly, we cannot simply
16 increase our assessments without
17 undertaking a laborious legislative
18 process.

19 Adding to it operational challenges:

20 The rule lacks clarity on acceptable
21 container types, alternating between
22 references to wheelie-bins and large
23 on-street containers while only
24 specifying a 55-gallon limit.

25 There are significant siting issues

1 for container placement in our dense and
2 urban environment, and specifically
3 along North Flatbush Avenue, which
4 currently hosts curbside regulations to
5 accommodate rush hour traffic demands.

6 Siting requirements and approvals
7 must be vetted through Department of
8 Transportation, proven to be a time
9 consuming process with little
10 flexibility, and, additionally, we are
11 shouldered with the task of explaining
12 these demands to impacted stakeholders.
13 Their disapproval of these demands may
14 then be unfairly aimed in our
15 organization.

16 The unintended consequences also
17 include efforts that might force some
18 BIDs to discontinue their public trash
19 collection service entirely, leading to
20 overflowing litter, increased street
21 debris, higher rat activity, and
22 degraded quality of life.

23 This punitive approach is
24 particularly troubling, that we face
25 fines for providing a public service.

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 The trash we collect has not been
2 generated or commercial waste. It is
3 public trash.

4 While the rule was modified to
5 provide -- to protect individual workers
6 from fines, our organizations still bear
7 the burden of compliance and potential
8 penalties. This punitive approach also
9 does not address the countless
10 commercial corridors who do not have
11 local stewardship as similar to BIDs.

12 We urge the -- we urge today to
13 consider alternative approaches. Align
14 this program with the forthcoming large
15 residential containerization roll-out to
16 ensure consistency and efficiency:

17 Establish designated periods during
18 which bags can remain on the street with
19 written DSNY agreements; create a grant
20 program to help BIDs purchase and
21 maintain compliant containers.

22 Develop clear guidelines for
23 container placement to coordinate with
24 all City agencies and provide exceptions
25 for BIDs based on operational

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

99

1 constraints and district
2 characteristics.

3 The North Flatbush Avenue BID has
4 discussed this mandate and currently
5 does not see a financial operation --
6 financial or operational pathway to an
7 August 1st compliance deadline as it
8 currently stands. As a long-standing
9 partner in maintaining clean streets, we
10 ask that -- to recognize the BIDs are
11 not the problem, but rather part of the
12 solution.

13 We share the goal of a cleaner, more
14 sustainable New York City. This
15 mandate, as currently structured,
16 threatens to undermine the very services
17 that help achieve that goal.

18 We remain committed to work with
19 everyone, including DSNY, to develop
20 practical solutions to serve our
21 communities effectively while advancing
22 the City sanitation goals.

23 Thank you for your consideration.

24 MS. LIGUORI: Thank you very much.

25 The next is Albert Dalipi, the

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

100

1 Deputy Director of the Fordham Road
2 Business Improvement District.

3 MR. DALIPI: Hi, everyone. So, my
4 name is Albert Dalipi. I'm here
5 testifying on behalf of the Chairman,
6 David Rose.

7 Fordham Road is the busiest
8 commercial district in the Bronx and
9 home to -- home to over 300 businesses
10 and 80 commercial buildings.

11 Our position on the agency rule is
12 simple. The rule and policy should be
13 scrapped altogether, especially given
14 how reckless this was rolled-out and how
15 it undermines more than 40 years of
16 public/private partnerships.

17 BIDs throughout New York City, as
18 part of our contractual obligation and
19 mission, have performed supplemental
20 City services to assist City
21 responsibilities in growing our
22 neighborhoods and keeping them clean.

23 We fill in the gaps in the essential
24 services the City attempts to provide;
25 one example being that BIDs provide the

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

101

1 liners for the trash cans at the BID's
2 expense and when the cans are filled,
3 they're left on the sidewalk for DSNY to
4 collect.

5 Requiring BIDs to containerize all
6 garbage 24/7, 365 is a drastic policy
7 shift that is punitive for numerous
8 reasons.

9 Firstly, BIDs are funded through an
10 additional tax assessment on each
11 property based on frontage, commercial
12 square footage, and assessed valuation,
13 which can vary widely with each BID's
14 district plans. In Fordham's case, the
15 BID's assessment is the sole source of
16 our BID sanitation expense line.

17 BIDs are tasked with providing
18 supplemental sanitation services. What
19 DSNY is wrongly asking us to do is
20 essentially now assume primary
21 responsibility of managing all public
22 trash, from bagging to containerization,
23 which goes against the very contract
24 that BIDs have with the City.

25 More than 33 percent of the Fordham

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

102

1 BID budget is dedicated to supplemental
2 sanitation services. In other BIDs,
3 that percentage is higher. The BID
4 manages an average of 12,000 trash
5 cans -- sorry -- 12,000 trash bags per
6 quarter, making containerization under
7 the new mandate impossible.

8 Finding containers is also
9 difficult, on Fordham Road particularly,
10 as there's a bus lane that runs along
11 the curb, leaving the sidewalks as the
12 only alternative. However, our
13 sidewalks are already crowded and
14 containerizing 12,000 trash bags will
15 require some -- a substantial number of
16 BIDs.

17 Rising operational costs due to new
18 insurance requirements, inflation,
19 minimum wage increases, and other
20 expenses further strain the BID
21 sanitation budget. In the interest of
22 fiscal responsibility, Fordham BID would
23 require significant additional resources
24 and funding to comply.

25 Fordham BID doesn't have the budget

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 for this proposed mandate that still
2 seems to lack clear guidelines -- that
3 still seems to lack clear guidelines.

4 Secondly, several Fordham
5 brick-and-mortar businesses have
6 informed the BID of fines they received
7 from DSNY for trash on the sidewalk when
8 the trash was actually left by some
9 street vendors in front of their shop,
10 who, in some instances, would not have
11 been there in the first place since
12 Fordham is a restricted street.

13 The City will be making all BIDs
14 responsible for trash outside the scope
15 of our contract.

16 In addition, recent news reports of
17 DSNY only writing about 10 tickets a day
18 for illegal street vending citywide are
19 also equally troubling, as there's a
20 correlation between the number of
21 vendors, amount of enforcement, and the
22 businesses of Fordham Road wrongly
23 receiving tickets for illegal dumping.

24 Thirdly, Fordham Road is a curbside
25 bus lane with limited public space

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

104

1 making sitting -- making placement and
2 compliance extremely difficult and this
3 rule shamefully assumes a one size fits
4 all approach, especially when on many
5 City blocks -- especially when on many
6 City blocks, street pits, hydrants,
7 benches, public art, food, and street
8 vendors, and other public infrastructure
9 all put a strain on the public realm.

10 In conclusion, the rule does not
11 provide the necessary guidelines for
12 funding or coordination BIDs will need
13 in order to ensure the clock -- in order
14 to ensure around the clock
15 containerization.

16 There are major siting issues we
17 will have to work through with DOT --
18 public safety issues involving limited
19 public space, and, of course, the
20 conflicts this rule creates with how
21 BIDs have operated for more than four
22 decades.

23 The new rule will significantly
24 change the way trash is managed, and,
25 quite bluntly -- and quite bluntly is an

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

105

1 existential threat to all to the future
2 of all BIDs.

3 Thank you.

4 MS. LIGUORI: Thank you very much.

5 The next we have is C. Virginia
6 Fields, 125th Street Business
7 Improvement District.

8 MS. FIELDS: Hello. Okay -- I'm
9 sorry. I was -- I was off for a second.

10 Good morning.

11 First of all, let me say, as a
12 member of the Board, I'm pleased to be
13 able to join this discussion, and to say
14 that the BID fully supports the City's
15 efforts in terms of, you know,
16 controlling trash, rat infestation, as
17 well as all of the other issues that
18 have been addressed.

19 So, let me start by simply saying
20 that we fully agree with the comments
21 that have been made, and instead of
22 going over all of them, that we'd like
23 to just make several recommendations.

24 We encourage the DSNY to consider
25 some of what has been mentioned -- but

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 for example, alternative compliance
2 options -- to consider alternative trash
3 management solutions as designated waste
4 consolidation zones, financial support
5 mechanisms for DSNY to reopen a grant
6 program or subsidy fund to assist the
7 BIDs in purchasing and maintaining
8 containers; agreements that include a
9 minimum contract term guaranteed, such
10 as purchasing and maintaining
11 containers, fair enforcement policies --
12 which we heard a lot about this
13 morning -- fines that -- to be used only
14 for waste directly managed by the BID
15 with DSNY assuming responsibility for
16 illegal dumping enforcement -- and we
17 strongly encourage collaboration and
18 transparency -- that DSNY will establish
19 a working group with big representatives
20 to develop practical solutions that meet
21 the City sanitation goals without
22 overburdening the very organizations
23 that help keep neighborhoods clean.

24 So, in conclusion, the 125th Street
25 Business Improvement District, which I

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

107

1 am speaking on behalf of as a member of
2 the Board, remains fully committed to
3 working with DSNY to find an equitable
4 path forward that benefits the City's
5 need for cleaner streets with the
6 realities faces by BIDs that jeopardize
7 our ability to function -- primarily
8 those that you have heard with relation
9 to financial concerns, as well as
10 implementation steps that would have to
11 be taken.

12 So, we appreciate your attention to
13 this critical matter and we certainly,
14 along with all of the BIDs, welcome
15 further discussions with the Department
16 of Sanitation.

17 Thank you so much and we look
18 forward to continuing to work with you
19 to address this critical problem and
20 needs within the City. Thank you.

21 MS. LIGUORI: Thank you very much.

22 Next up we have Tiera Mack, the
23 Executive Director of the Pitkin Avenue
24 BID.

25 MS. MACK: Hi. I'm Tiera Mack and I

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

108

1 am a current CITIBIN user that is
2 opposed to a mandatory containerization
3 for BIDs in commercial corridors.

4 Again, the Pitkin Avenue BID has an
5 assessment of \$225,000. We cover 32
6 block bases and currently hold 52 litter
7 baskets over 64 corners. In FY '24, our
8 operating budget was \$380,000. We spent
9 \$145,000 on sanitation, which was almost
10 40 percent of our budget.

11 The Pitkin Avenue BID has been using
12 containers since 2022 when we were
13 awarded approximately \$28,000 for
14 containers and supplies to maintain the
15 containers under the DSNY and SBS
16 Neighborhood Challenge grant.

17 This grant was initially advertised
18 as a pilot to test the reality of
19 commercial corridor containerization,
20 but DSNY failed to monitor this pilot's
21 process and subsequent failures or
22 successes.

23 DSNY has not collected any data
24 points from me, or have they met with me
25 as a BID leader who uses containers,

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 just for basic feedback.

2 We currently have 13 modules over
3 three locations. They hold 65 50-gallon
4 bags. In FY '24, we put out 39,000 bags
5 for collection. A third of them were
6 containerized. We spent \$20,000
7 containerizing those bags and labor
8 costs.

9 To containerize all of the bags in
10 2024, we would have had to spend an
11 additional 25 to \$40,000 and labor costs
12 are growing. Plus, we would need
13 another four to six containers.

14 With the proper DSNY sanitation
15 pick-up schedule, we could lower that
16 labor cost, but this will require DSNY
17 to be a true and trusted partner with us
18 and actually monitor us as a BID in this
19 program.

20 In 2023, when litter baskets began
21 to disappear from the corridor, never to
22 be replaced, we attempted to purchase
23 BasketPlus from CITIBIN, which is a
24 basic -- basic litter basket with the
25 container as a (indiscernible).

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

110

1 The clean team would have been able
2 to containerize five bags at every
3 corner that the litter basket is at.
4 DSNY denied our request and said that
5 only the baskets they are servicing are
6 (indiscernible). While easier for DSNY
7 staff to lift, they are expensive and
8 less durable, and once they break, they
9 are not being replaced. Pitkin BID is
10 currently missing 12 litter baskets.

11 Is my time up -- oh, okay.

12 MS. LIGUORI: (Indiscernible.)

13 MS. MACK: Okay. Though commercial
14 corridor containeration (sic) has many,
15 many benefits, there are so many
16 limitations, such as improper disposal
17 and illegal dumping, which, again,
18 counteracts the attention of this
19 program.

20 We are asking DSNY to create and
21 provide a real solution to those issues.
22 We are asking DSNY to provide us with
23 schedule goals and let's work together
24 as BIDs and City agencies to actually
25 understand when our pick-up is going to

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

111

1 happen.

2 I would also ask DSNY if
3 containerization is going to be our way
4 moving forward, can we reconsider
5 BasketPlus as a litter basket option.

6 In addition to that, I'm also asking
7 DSNY to think about pay equity for our
8 staff because we are paying people much
9 lower wages, not because we want to, but
10 because that is the way that vendor and
11 sanitation contracts have worked. So,
12 they're making way less than DSNY staff,
13 but doing a lot of DSNY's work.

14 Again, the cost of this is
15 astronomical and we are really in fights
16 over public space, which we know, as
17 City agencies, BIDs, and residents of
18 New York City, our public spaces are
19 what we need to move the City forward
20 and to cover them all with containers, I
21 think it's a bit -- it's just a bit -- a
22 bit of a disservice for the residents of
23 this City.

24 Thank you.

25 MS. LIGUORI: Thank you very much.

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

112

1 Next, we have is Nate Reynolds from
2 the -- yeah, Nate Reynolds from the
3 Clean Bushwick Initiative.

4 MR. REYNOLDS: Hi. My name is Nate
5 Reynolds and I'm providing testimony on
6 behalf of the Clean Bushwick Initiative,
7 or CBI, and we kindly request that you
8 withdraw the proposed rule.

9 CBI is a community organization
10 based in Bushwick, Brooklyn that works
11 to improve the cleanliness and
12 sustainability of our neighborhood
13 through organized volunteer clean-ups.

14 In 2024, the CBI hosted 15 clean-ups
15 throughout Bushwick engaging over 250
16 volunteers and removing over 3,600
17 pounds of trash off the street. We
18 organize community clean-ups because we
19 have the same goals as DSNY -- cleaner
20 streets. However, this proposed rule
21 would effectively outlaw the community
22 clean-ups that help us to clean those
23 streets.

24 Currently, Section 16-120 prohibits
25 the placement of household or commercial

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 refuse in or around a public litter
2 basket. Ostensibly, the proposed rule
3 seeks to clarify that community clean-up
4 organizations also may not place trash
5 within the vicinity of any public litter
6 basket.

7 The notion that Section 16-120 needs
8 clarity is misguided and appears to rely
9 on a fundamental misunderstanding of
10 what clean-up organizations like CBI do.
11 We do not create trash; we remove it.

12 CBI collects litter already in the
13 streets and places it near public
14 receptacles, making it easier for DSNY
15 to collect and dispose of. The actual
16 effect of this proposed rule would be to
17 make it illegal for community
18 organizations to organize clean-ups and
19 collect trash because we would have
20 nowhere to put it.

21 We are not creating new trash. We
22 are collecting the trash that already
23 exists, and to call this illegal
24 dumping, would have devastating impacts.

25 CBI focuses its efforts in Bushwick,

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 which has been designated a
2 disadvantaged community by the New York
3 State Climate Justice Working Group and
4 large parts of the neighborhood are
5 included in a rat migration zone.

6 The neighborhood already lacks
7 adequate trash bins, enforcement, and
8 resources for waste management. This
9 rule would hurt underserved communities
10 like ours the most, where residents rely
11 on local efforts to keep the streets
12 clean.

13 DSNY cannot manage all the waste on
14 its own, so community groups fill the
15 gaps. If groups like ours can't
16 operate, the trash in our neighborhoods
17 will pile up and the impact would go
18 beyond just street cleanliness.

19 The CBI maintains a number of rain
20 gardens in Bushwick that are necessary
21 to absorb storm-water, reduce flooding,
22 and filter pollutants. Our clean-ups
23 regularly focus on cleaning trash from
24 the rain gardens and surrounding streets
25 to ensure that the gardens are able to

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

115

1 function properly. Without a way to
2 dispose of this waste, maintaining the
3 rain gardens becomes much harder and
4 which would lead to more flooding and
5 pollutants.

6 If the goal of Section 16-120, and
7 DSNY more broadly, is to prevent litter
8 and reduce trash on the streets, this
9 proposed rule must be rejected.

10 Thank you.

11 MS. LIGUORI: Thank you.

12 Next up we have Marta Schlitzer from
13 the Jackson Heights Beautification Group
14 Tree LC.

15 MS. SCHLITZER: Hi. Thank you so
16 much. Thanks, Nate, for starting out
17 our community's people talking about
18 this.

19 I'm with the Jackson Heights
20 Beautification group, and our specialty
21 is the Tree LC, which takes care of our
22 commercial corridors, street trees and
23 their beds, and expands them and plants
24 trees.

25 Jackson Heights Beautification Group

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

116

1 has been a not-for-profit entity in our
2 neighborhood for over 35 years now.

3 Much to what Nate spoke of, we are a
4 community entity trying to keep our
5 streets and tree beds clean. We do this
6 every single Saturday morning. We would
7 love to just take care of the trees, but
8 a lot of trash comes with that and we'd
9 love to thank DSNY. Our local trash
10 pick-up guys are fabulous.

11 Our -- we also have a large ACE
12 group out taking care of the litter
13 baskets on our commercial corridor. We
14 do also have our 82nd Street BID
15 community. So, we have a lot of
16 resources in our neighborhood. We do
17 supplement a lot, as our volunteers help
18 out to keep things clean.

19 So, you did include not-for-profit
20 and community organizations in your
21 proposal, so that has freaked us out.
22 As Nate said, everywhere is being
23 affected by trash.

24 In our community in particular,
25 which is why I wanted to give testimony,

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

117

1 we do have a large swath of our
2 community to the eastern side, which has
3 a lot of landlords who are telling their
4 packed-in tenants, in what are basically
5 SRO buildings -- you know, triple-family
6 homes and whatnot -- these landlords are
7 telling their tenants, who they are
8 getting good money from, to not put
9 their residential trash in the trash on
10 their property.

11 So, we constantly see residential
12 trash -- large and small -- going into
13 our street bins. This has caused the
14 DSNY to need to make the decision to
15 remove some of those bins in the worst
16 places.

17 While those areas where those bins
18 were are being able to be maintained
19 cleanly, reasonably -- we do put in a
20 lot of 311 requests -- we do find that
21 trash going to other places in the
22 neighborhood. The primary place is rain
23 gardens, which is devastating.

24 We have started reporting that and
25 working with the DEP on that trash

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

118

1 removal. We do have some great
2 merchants who support us and will take
3 our trash bags and put them with their
4 trash, but we do use the street bins a
5 lot.

6 We do help out ACE. We do consider
7 not overfilling those bins and putting
8 the bags neatly, and actually taking
9 some of the trash out, neatly putting it
10 in bags so that the trash doesn't
11 overflow.

12 But I did want to bring up this big
13 problem -- specifically to our
14 neighborhood -- lots of other BID
15 districts have spoken about how each
16 area is very different from one another,
17 and while this is a commercial area that
18 is not part of a BID district and is
19 serviced by our ACE from our community
20 council district, it is surrounded by
21 huge residential areas, and this
22 residential trash is a huge problem and
23 we'd love DSNY's support on figuring out
24 how to get to these landlords, who are
25 making tons and tons of money on

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

119

1 illegally stuffing their properties full
2 of humans and not being responsible for
3 their trash -- and residents don't
4 know -- they don't understand. It ends
5 up in the litter baskets.

6 Thank you so much for your time.
7 I'll put the details of my testimony in
8 an email to you.

9 MS. LIGUORI: Thank you very much.

10 Next up we have is Monica Blum, the
11 President of the Lincoln Square BID.

12 MS. BLUM: Thank you very much. I'm
13 pleased to be here to testify on behalf
14 of the Lincoln Square BID.

15 We have an almost 30-year
16 partnership with DSNY. We
17 enthusiastically supported every single
18 initiative that Sanitation rolled out,
19 including this one.

20 While I appreciate their efforts to
21 seek our feedback, I'm really dismayed.
22 I'm horrified actually by the punitive
23 nature of these rules.

24 On a certain level, the fines sound
25 to me like an OMB idea. I've seen this

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

120

1 before. I can't believe that DSNY is
2 threatening to fine and punish business
3 improvement districts and other partners
4 for helping Sanitation do its job.

5 As per our district plan approved by
6 the City Council, and our contract with
7 SBS, we supplement City sanitation
8 services across 84 block faces. The
9 language is clear. We supplement what
10 DSNY does. We don't replace City
11 services. This is public trash.
12 Approximately, 40 percent of our budget
13 goes to sanitation.

14 The former Sanitation Commissioner
15 said the goal was to bring BIDs in line
16 with other businesses and residential
17 buildings. Herein lies a major flaw in
18 the reasoning behind these rules.

19 We are not retail businesses or
20 residential buildings. We are private
21 nonprofit organizations and we are a
22 critical public private partnership that
23 helps DSNY keep the City clean. These
24 rules run counter to the reason business
25 improvement districts were created in

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

121

1 the first place and undermine our core
2 missions.

3 In 2022, we were among the first to
4 apply for DSNY's pilot program through
5 the Clean Curbs initiative and installed
6 two five-module CITIBIN units with site
7 approval from DOT.

8 At that time, DSNY reimbursed us for
9 the cost of our two CITIBINs. Our goal
10 was totally in sync with the City's,
11 getting piles of bags of public trash
12 off the corners and sidewalks. We were
13 pleased with our first two CITIBINs.

14 Unfortunately, the program was
15 totally suspended until last spring when
16 we immediately applied to install
17 additional CITIBINs. We now have a
18 total of six five-unit modules, which
19 DSNY services daily. We need two more,
20 but finding locations has been extremely
21 challenging.

22 I respectfully request that DSNY
23 rethink and rescind these punitive rules
24 and work with us to come up with a plan
25 that recognizes that business

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

122

1 improvement districts are trusted and
2 necessary partners.

3 If the rules are to be implemented,
4 we are recommending that they codify a
5 number of situations and conditions that
6 should not be left to agency discretion.
7 I mean, there have been a lot of
8 Sanitation Commissioners. Leaders
9 change and will change again.

10 First of all, eliminate all fines
11 that -- that punish anyone. We think
12 it's inappropriate and counterproductive
13 to fine BIDs for helping the City do its
14 job.

15 The rules are silent on extenuating
16 or exigent circumstances and must
17 include language that addresses missed
18 pick-ups, holidays, parades, visiting
19 presidents, snow -- like now -- and
20 allow for the placement of bags either
21 in front of containers or in front of
22 cans for those who use them.

23 The rules should apply to government
24 agencies, as well as everyone else --
25 MTA, film companies. You should see

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

123

1 what we -- what garbage is piled up when
2 there's a filming over three days and
3 the MTA places piles of bags right along
4 Central Park West along the Trump Hotel,
5 and when they eventually get to pick
6 them up, there are also Transit Police
7 bags. They are sitting out in garbage
8 bags. They all draw lots of rats.

9 The rules must ensure that DOT works
10 with DSNY, BIDs, and SBS to find
11 locations. It's impossible to find
12 locations. We tried to move one little
13 standing only sign that was used for
14 police parking and DOT couldn't do it.
15 So, we had to put a CITIBIN several
16 blocks away, which really taxes the
17 workers.

18 Finally, the rule should apply --
19 should include a funding program that
20 would help cover costs for all BIDs.
21 I'm not a small BID. I'm not a large
22 BID. I'm a medium BID. 52 percent of
23 my neighborhood is residential. This is
24 taxing our budget. We -- we may show a
25 loss this year because we are budgeting

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

124

1 for all sorts of supplies and equipment
2 to keep our CITIBINs clean.

3 Our City -- our businesses and
4 property owners are very pleased with
5 the absence of bags on the sidewalks.
6 We really appreciate the support of
7 Chief Lettera -- I saw him there
8 earlier -- and Superintendent Quinn and
9 his staff. They're really trying to
10 help us.

11 Currently, we have worked out an
12 informal system that we place the bags
13 when they're -- when there's no pick-up
14 in front of our CITIBINs, but we can't
15 rely on that and I don't think anyone
16 else can.

17 This rule imposes an unfunded
18 mandate that punishes and penalizes
19 private nonprofit organizations for
20 providing supplemental services that
21 help DSNY keep the City clean. That's
22 why we were created. This violates the
23 spirit of collaboration and undermines
24 the very foundation that supports our
25 organizations.

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

125

1 Thank you.

2 P.S., my husband -- I've been
3 married 44 years -- was Deputy
4 Commissioner for Waste Management at
5 Sanitation. That garage on 57th Street,
6 I went to that opening. I am a
7 sanitation junkie and I'm still
8 horrified.

9 Thank you.

10 MS. LIGUORI: Thank you.

11 The next up is Catie Savage from
12 Litter Legion.

13 (No response.)

14 MS. LIGUORI: Catie?

15 MS. SAVAGE: I just realized I
16 wasn't -- not un-muted. Sorry.

17 Hi. My name is Catie Savage,
18 founder of the Litter Legion, a
19 volunteer community group based in the
20 Hell's Kitchen neighborhood of
21 Manhattan.

22 I want to start by saying that we
23 recognize the often thankless work of
24 the uniformed men and women of the
25 Department of Sanitation tasked with

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

126

1 keeping our City clean and are grateful
2 for their dedication, particularly in
3 the winter, when their jobs get even
4 harder.

5 In 2020 when the City of New York
6 implemented severe budget cuts to
7 Department of Sanitation -- particularly
8 in relation to litter basket
9 collection -- the Litter Legion was
10 formed to organize volunteers to help
11 keep our community clean.

12 At that time, we not only collected
13 loose litter from the sidewalks and
14 curbs, but also emptied overflowing
15 public litter baskets that stayed
16 overflowing for days. Five years later,
17 we continue to organize volunteers to
18 keep our curbs and sidewalks clean and
19 have collected over 13,000 pounds of
20 litter.

21 We have heard from many
22 representatives from business
23 improvement districts that would be
24 impacted by this rule, but as written,
25 it also includes volunteer groups, like

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 the Litter Legion, and dozens of other
2 groups around the City that clean in
3 areas that are not serviced by BIDs or
4 other supplemental sanitation services.

5 To require that these groups
6 purchase, store, and maintain rigid
7 receptacles with tight-fitting lids in
8 order to have their bags of litter
9 collected under threat of fines is
10 frankly outrageous.

11 Despite assurances from leaders
12 within the Department that this rule
13 would not be applied to our
14 organization, the language very clearly
15 includes us. One such leader
16 characterized the purpose of this rule
17 as stopping the practice of abandoned
18 bags being left at public litter
19 baskets.

20 I would argue that the bags placed
21 here by volunteer organizations,
22 non-profits, and BIDs are not abandoned;
23 Rather, they are left at a location most
24 convenient for Sanitation workers to
25 collect without disrupting their regular

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

128

1 routes.

2 We ask for a complete rejection of
3 this proposed rule as written and ask
4 that DSNY engage with all the
5 stakeholders who have spoken today on
6 any future proposals that impact our
7 organizations.

8 Thank you.

9 MS. LIGUORI: Thank you very much.

10 Next up is Allie Falco from Queens
11 Trash.

12 MS. FALCO: Hello, everybody.
13 Thanks, Catie, for speaking. Catie has
14 been really great about organizing our
15 community clean-up groups together.
16 We're all united in this opposition to
17 this new rule.

18 So, my name is Allie Falco. I'm the
19 founder of the community clean-up group,
20 Queens Trash.

21 I'd like to first thank all the
22 workers of both DSNY and its nonprofit,
23 the Sanitation Foundation, and for you,
24 Madelynn, for sitting through two hours
25 of comments here, and for, you know,

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

129

1 efforts throughout the City.

2 I'm a concerned New Yorker using my
3 own money to supply and host community
4 clean-up and beautification efforts
5 across Queens and Manhattan. This rule,
6 as written, puts an undue hardship on my
7 work and the work of many other
8 volunteer community groups who are
9 helping to clean-up their neighborhoods
10 in their free time, by threatening
11 penalties for dropping bags of public
12 litter next to public containers --
13 which I'm assuming in these situations
14 are too full to accept more trash.

15 There's currently a system in place
16 by the Sanitation Foundation -- who does
17 great work, by the way -- that allows us
18 to notify DSNY weeks -- two weeks in
19 advance of how many garbage bags we will
20 be dropping for collection. It
21 schedules a garbage truck and multiple
22 DSNY workers to pick up these bags at a
23 designated location.

24 While this system may work for large
25 planned community clean-ups, it's not

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

130

1 often efficient to send out a team of
2 DSNY workers for a small to moderate
3 amount of trash that is collected on a
4 daily or weekly basis when routes and
5 clean-up demand are ever-changing.

6 I, along with other volunteer
7 clean-up groups, asked DSNY to consider
8 the following actions:

9 One, a complete rejection of this
10 proposed rule as written.

11 Two, an updated language to
12 specifically exclude volunteer community
13 groups.

14 And, three, a revised system to
15 allow volunteer groups to interface with
16 DSNY or with the Sanitation Foundation
17 in real-time to alert them of clean-up
18 activities resulting in bags being left
19 at public litter baskets for collection,
20 rather than the current system of
21 filling out documents at least two weeks
22 in advance with information that we may
23 not have available at the time.

24 In addition, I'd like to sincerely
25 thank the BIDs that have spoken today,

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

131

1 and the representatives, and the -- what
2 do we have -- we used to have 120 people
3 in this meeting. Now, we have 98.

4 I'd like to thank everyone that's
5 here today for getting involved in the
6 decisions that are affecting their
7 communities. I encourage you all to
8 continue speaking up for what you
9 believe is right on a daily basis.

10 I would also like to encourage the
11 DSNY to host future meetings on a more
12 accessible platform, such as Zoom.
13 Microsoft Teams is a hard program to
14 access if you do not have a Microsoft
15 account, which is usually something that
16 the general public does not have
17 without, like, an office job.

18 I believe we would have had more
19 people present here today if it was not
20 hosted on Teams.

21 But, thank you, Madelynn. Thank you
22 all for allowing us to speak.

23 MS. LIGUORI: Thank you so much. I
24 appreciate it.

25 Next up is Noah Sheroff from the

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

132

1 Bayside Village BID.

2 MR. SHEROFF: Hello. Thank you for
3 allowing me the opportunity to testify.
4 I apologize for missing the first round.

5 Thank you to Allie, who just
6 mentioned the issue with Microsoft
7 Teams. It's exactly what I was
8 experiencing and had to call in.

9 I wanted to first point out, as many
10 others have, a huge thank you DSNY. I
11 think they did a phenomenal job with the
12 snow cleaning operations as -- and -- or
13 -- very often reliable. A special shout
14 out to Antonio Whitaker and Queens
15 Sanitation, garage 11.

16 A lot of what I am about to say has
17 been said before, but, yes, we are a
18 small BID. Again, not the smallest
19 business improvement district here in
20 Bayside, Queens; practically just a
21 stone's throw away from the Long Island
22 border -- and this proposal -- this
23 policy will deeply impact us, not only
24 from a budget perspective, but also was
25 mentioned from siting concerns and

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

133

1 potentially a large public backlash from
2 a very vocal community.

3 I -- in addition to that, as has
4 also been brought up before, there -- we
5 have one cleaner -- one cleaner -- and
6 still this is taking up about, I want to
7 say, a third -- just over a third of our
8 budget to have this one rock star from
9 Streetplus, who was here six days a
10 week, sweeping, cleaning up graffiti,
11 changing hands, making sure Bayside,
12 Queens looks tremendous -- and I'm also
13 concerned that this will put an undue
14 hardship on that one worker to meet
15 these requirements in addition to just
16 potentially increasing the cost for our
17 business improvement district.

18 And I too would like to echo
19 concerns that perhaps there is a way for
20 each BID to connect with DSNY as has
21 been done to try and find out a more
22 personalized solution for the BIDs, as
23 each community will be affected in a
24 different way.

25 Thank you so much.

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

134

1 MS. LIGUORI: Thank you very much.

2 Next we have Andrew Yen from Cleanup
3 Crown Heights.

4 (No response.)

5 MS. LIGUORI: Okay. Mario
6 Buonviaggio from the Port Richmond North
7 Shore Alliance.

8 (No response.)

9 MS. LIGUORI: David Estrada, the
10 Executive Director of the Sunset Park
11 Fifth Avenue BID. He was cut off
12 earlier.

13 (No response.)

14 MS. LIGUORI: Okay. One more time,
15 Andrew Yen from Cleanup Crown Heights.

16 (No response.)

17 MS. LIGUORI: Mario Buonviaggio from
18 Port Richmond North Shore Alliance.

19 (No response.)

20 MS. LIGUORI: David Estrada,
21 Executive Director of the Sunset Park,
22 Fifth Avenue BID.

23 (No response.)

24 MS. LIGUORI: Okay. Is anyone out
25 there that wishes to testify? You can

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

135

1 use the "raise hand" function at this
2 point.

3 MS. MIFLIN: (Indicating.)

4 MS. LIGUORI: Claire Miflin from the
5 Center for Zero Waste Design.

6 MS. MIFLIN: Yeah, I'd like to
7 testify. Thank you so much. I haven't
8 got my formal testimony ready. I will
9 be sending it in later today.

10 But we're a nonprofit that has been
11 advocating for better waste
12 containerization since we released the
13 zero waste design guidelines back in
14 2017 and we recently released this
15 report on containerization that really
16 looked at how the Department of
17 Sanitation could do containerization in
18 a way that made it better for labor,
19 better for street-scapes, better for
20 Sanitation workers, and better for
21 BIDs -- and I think there has not been
22 enough consideration about how
23 BID-managed and other community
24 group-managed waste should be
25 containerized -- and this rush to just

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

136

1 put it in 55 gallon bins is not the best
2 use of our curbside space.

3 We could do stuff that is way more
4 space efficient than 55-gallon bins and
5 I'm already concerned about the number
6 of two-wheel bins on sidewalks from the
7 containerization rules for both one to
8 nine unit buildings and commercial
9 buildings. We see that it really takes
10 a lot of space on the sidewalk and
11 pedestrians can't make their way down.
12 It's not good for storefront businesses
13 to have their storefronts with lines of
14 bins in front and I think there's many
15 ways that containerization could be
16 done.

17 I mean, what the -- there's more
18 suggesting and what's really out there
19 are these enclosures by CITIBIN or
20 metroSTOR, which are very expensive.
21 Now, the Empire bin they're using may be
22 a better solution, for example, for some
23 of the BIDs that have a lot of waste.
24 It would be -- take up way less curbside
25 space.

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

137

1 So, I think DSNY should be trying
2 some different options with different
3 BIDs. Maybe some BIDs I've heard have
4 access to, say, a commercial loading
5 dock and it needn't be on the street at
6 all.

7 There's many different situations
8 for many different BIDs, some -- other
9 ones, it could just be there for a few
10 hours and doesn't need to be
11 containerized at all -- that I think
12 this is definitely not something that
13 can be put on the BIDs to figure out.

14 DSNY needs to work on some
15 solutions. They need to pilot them,
16 evaluate them, and then work with the
17 BIDs and other entities to figure out
18 what can work for them cause, as we've
19 heard time and time again, these are
20 groups that are working really, really
21 hard to help DSNY with litter bin waste
22 and I really think we should be working
23 with them. There should be stakeholder
24 engagement to make it -- to make it
25 work.

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

138

1 So, thank you so much for the time,
2 Madelynn, and just to end, I really do
3 respect everything the uniformed DSNY
4 people do to help keep our City clean.
5 It's not in any way an attack on them.
6 It's just a suggestion that we plan for
7 something that works for everybody.

8 I appreciate the time to testify.

9 MS. LIGUORI: Thank you very much.

10 Okay. Last call for Andrew Yen from
11 Cleanup Crown Heights.

12 (No response.)

13 MS. LIGUORI: Mario Buonviaggio from
14 Port Richmond North Shore Alliance.

15 (No response.)

16 MS. LIGUORI: And David Estrada, the
17 Executive Director of the Sunset Park
18 Fifth Avenue BID.

19 (No response.)

20 MS. LIGUORI: If anyone else wishes
21 to testify, you may use the "raise hand"
22 function.

23 (No response.)

24 MS. LIGUORI: Okay. Seeing none,
25 I'm going to call this hearing to a

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

1 close.

2 Thank you, everyone, for testifying
3 today. The Department will consider all
4 comments it receives.

5 If you would still like to -- if you
6 would still like to submit written
7 comments, you may do so until close of
8 business today at nycrules@dsny.nyc.gov
9 or you may use the NYC Rules website and
10 post directly there.

11 Thank you, everyone, for coming and
12 I hope that you have a wonderful day.

13 (Time noted: 12:02 p.m.)

14

15

16

17

18

19

20

21

22

23

24

25

In Re Public Hearing DSNY Proposed Amendments to Rule Relating to
Entities Engaging In Cleaning Services
February 10, 2025

140

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

C E R T I F I C A T E

STATE OF NEW YORK)

:SS

COUNTY OF NASSAU)

I, Julia M. Speros, a Notary Public
within and for the State of New York, do hereby
certify:

I reported the proceedings in the
within-entitled matter, and that the within
transcript is a true record of such proceedings
to the best of my ability.

I further certify that I am not
related to any of the parties to this action by
blood or marriage; and that I am in no way
interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto
set my hand this 10th day of February, 2025.



Julia M. Speros

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

141

\$145000 108:9	50th 34:4	accessible 39:17 131:12
\$150000 76:10	55gallon 96:24 136:4	accommodate 96:14 97:5
\$20000 109:6	57th 125:5	accomplish 57:15
\$225000 108:5	5th 3:8 67:21 68:7	accordance 5:11 6:16 7:8
\$255000 82:11	64th 68:8	accordingly 12:6
\$28000 108:13	6th 75:2	account 39:1 88:13 90:5 131:15 (4)
\$380000 108:8	82nd 116:14	accounting 28:7
\$390000 55:14	96th 92:13	accurate 84:6
\$400 76:14	abandoned 127:17,22	accurately 9:23
\$40000 83:12 109:11	abandoning 13:20	ace 2:20 46:10,13,17,20 47:5,16 48:4,8,16,20,24,25 49:5 50:6 116:11 118:6,19 (18)
\$50000 16:19	ability 13:2,14 32:3 36:9 39:13 47:11 49:23 107:7 140:14 (9)	ace's 47:11 48:2 49:23
\$60000 79:4	able 6:5 13:9 20:22 30:14 36:2,4 52:6,13 59:15 62:2 105:13 110:1 114:25 117:18 (14)	achieve 14:4 32:25 51:10 52:19 54:16 63:17 72:8 73:3 84:19 99:17 (10)
'22 78:24	about 11:23 19:13 25:19 27:20 52:3 63:8 78:10 80:17 82:11 86:22 89:10 91:9 94:22 103:17 106:12 111:7 115:17 118:15 128:14 132:16 133:6 135:22 136:5 (23)	achieving 86:10
'24 58:17 108:7 109:4	absence 124:5	ackert 3:3 57:20,23,25 (4)
10th 140:20	absolutely 22:4 42:2	acknowledge 11:20 46:14
10year 76:12	absorb 76:17 114:21	acknowledgement 14:18
110th 92:13	accelerate 52:20,23	acquire 71:15
125th 4:125 105:6 106:24	accelerated 19:16	across 8:14 34:1 46:23 64:5 120:8 129:5 (6)
16120e2 6:9 7:6,25 8:3 (4)	accept 129:14	act 5:13
1980s 38:12	acceptable 38:15 96:20	action 20:5 140:16
1st 18:16 20:10 47:19 54:4 62:19 80:23 99:7 (7)	accepting 8:20	actions 130:8
26block 68:6	access 131:14 137:4	actively 75:7
30year 119:15		activities 130:18
38th 34:4 68:8		activity 97:21
40yearold 94:25		
50gallon 109:3		

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

142

<p>actual 113:15</p> <p>actually 39:6 84:7 103:8 109:18 110:24 118:8 119:22 (7)</p> <p>adapt 86:17</p> <p>added 46:8</p> <p>addiction 49:15</p> <p>adding 26:21 63:19 78:23 83:10 84:14 96:19 (6)</p> <p>addition 20:25 56:12,18 76:18 103:16 111:6 130:24 133:3,15 (9)</p> <p>additional 16:10 17:10 21:15 32:12 34:10 49:20 63:22 71:1 101:10 102:23 109:11 121:17 (12)</p> <p>additionally 5:21 17:21 31:24 97:10 (4)</p> <p>address 70:11 86:9 98:9 107:19 (4)</p> <p>addressed 105:18</p> <p>addresses 72:6 122:17</p> <p>addressing 82:18</p> <p>adequate 114:7</p> <p>adhere 47:17 70:20</p> <p>adjust 86:15</p> <p>administration's 89:23</p> <p>administrative 5:12 6:10 7:7 8:1,4 70:23 (6)</p> <p>administrators 95:5</p> <p>adopt 13:10 47:16 55:7</p> <p>adopted 20:14 54:6 70:14</p>	<p>advance 9:15 129:19 130:22</p> <p>advancing 99:21</p> <p>advertised 108:17</p> <p>advocated 58:24</p> <p>advocating 135:11</p> <p>affected 116:23 133:23</p> <p>affecting 131:6</p> <p>affiliation 9:19,21</p> <p>affirming 11:17</p> <p>afford 23:9 26:24 28:9 48:20 (4)</p> <p>affordable 27:22</p> <p>affront 44:6</p> <p>after 10:19 47:14 49:6 76:14 (4)</p> <p>again 25:22 60:13 67:16 108:4 110:17 111:14 122:9 132:18 137:19 (9)</p> <p>against 31:25 101:23</p> <p>agencies 39:9 70:2 71:2 72:22,24 93:7 95:6 98:24 110:24 111:17 122:24 (11)</p> <p>agency 2:4 5:6 12:8 23:11 27:16 52:13 55:18 71:1 74:3 100:11 122:6 (11)</p> <p>agnostic 27:19</p> <p>ago 37:13 72:23 73:12 78:1 82:4 95:11 (6)</p> <p>agree 22:10 105:20</p> <p>agreed 23:24 95:18</p> <p>agreement 24:14 33:19</p>	<p>agreements 86:13 98:19 106:8</p> <p>ahead 62:9</p> <p>aim 25:16</p> <p>aimed 92:16 97:14</p> <p>ak14 82:2</p> <p>alarm 33:24</p> <p>albeit 37:14</p> <p>albert 3:21 99:25 100:4</p> <p>alert 130:17</p> <p>alex 11:1</p> <p>alexa 89:15</p> <p>align 8:7 88:7 98:13</p> <p>aligned 39:12</p> <p>alignment 86:3</p> <p>aligns 8:10</p> <p>alike 93:9</p> <p>allard 22:6</p> <p>alliance 2:9,19 3:4,6,11,14 10:22 11:13,16 12:24 13:23 43:2,5 57:22 58:2,3,24 60:13,16 65:3,7,10 72:13,18 81:8,12 134:7,18 138:14 (29)</p> <p>allie 4:11 128:10,18 132:5 (4)</p> <p>allocate 21:1</p> <p>allocations 48:24</p> <p>allotted 27:1</p> <p>allow 25:11 34:12 35:18 50:12 70:16 122:20 130:15 (7)</p> <p>allowed 63:5</p>
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services

February 10, 2025

143

<p>allowing 72:19 92:4 131:22 132:3 (4)</p> <p>allows 28:13 129:17</p> <p>almost 19:11,12 37:1 92:24 108:9 119:15 (6)</p> <p>alone 20:8 35:24 64:15 76:10 86:25 (5)</p> <p>along 25:14,18 34:20 55:2 64:4 97:3 102:10 107:14 123:3,4 130:6 (11)</p> <p>alongside 25:3</p> <p>already 13:17 16:22 27:3 40:22 62:11 82:11 85:3 87:10 91:11 96:13 102:13 113:12,22 114:6 136:5 (15)</p> <p>also 6:2 7:10 9:25 15:11 18:2 20:11,18 22:13 24:21 26:25 37:6 41:3,10 53:25 56:21 61:3 62:15 63:10 71:14 72:18 77:5 83:25 87:9 97:16 98:8 102:8 103:19 111:2,6 113:4 116:11,14 123:6 126:14,25 131:10 132:24 133:4,12 (39)</p> <p>alter 75:18 93:12</p> <p>alternating 96:21</p> <p>alternative 98:13 102:12 106:1,2 (4)</p> <p>alternatives 28:23</p> <p>although 74:7</p> <p>altogether 21:4 56:7 64:1 100:13 (4)</p> <p>always 65:14 77:13</p> <p>am 10 5:4 18:24 40:20 107:1 108:1 125:6 132:16 140:15,17 (10)</p> <p>amendment 55:8,22 57:12 90:3,12,19 (6)</p>	<p>amendments 87:17 89:11</p> <p>amenities 67:9</p> <p>among 72:23 121:3</p> <p>amount 7:2,20 31:12 54:7 68:9 78:16 103:21 130:3 (8)</p> <p>amsterdam 92:12</p> <p>analysis 22:21 48:7</p> <p>andor 93:12</p> <p>andrew 10:12,15 134:2,15 138:10 (5)</p> <p>annual 15:20 16:21 55:14 76:11 79:5 82:13 96:12 (7)</p> <p>annually 34:8 36:24 58:14</p> <p>another 14:11 38:20 79:20 109:13 118:16 (5)</p> <p>answer 73:10</p> <p>anticipated 76:12</p> <p>antonio 132:14</p> <p>anymore 30:15</p> <p>anyone 9:16 122:11 124:15 134:24 138:20 (5)</p> <p>apartment 24:8</p> <p>apologize 132:4</p> <p>appears 113:8</p> <p>applicable 25:9</p> <p>applications 71:3</p> <p>applied 66:24 121:16 127:13</p> <p>applies 65:13</p> <p>apply 121:4 122:23 123:18</p>	<p>applying 70:23</p> <p>appreciate 29:22 31:14 77:7 81:23 89:13 91:23 94:10 107:12 119:20 124:6 131:24 138:8 (12)</p> <p>approach 33:21 38:21 40:12 69:24 95:8,25 97:23 98:8 104:4 (9)</p> <p>approaches 98:13</p> <p>appropriate 18:1 19:23</p> <p>approval 17:20 32:11 54:1 59:8 87:7 121:7 (6)</p> <p>approvals 97:6</p> <p>approve 32:3 59:24 73:17</p> <p>approved 54:2 60:7 67:1 70:15 75:17 120:5 (6)</p> <p>approximately 16:18 108:13 120:12</p> <p>arduous 60:1</p> <p>are 10:2,9,11 12:4,20,21 13:17 17:16 18:8,23 19:15 22:24 23:2,8,17 24:22 25:2,7 27:12,23 28:12 30:22 31:14,21 32:12 34:9,18 35:1,20,25 36:8,8 40:22 41:18,20 42:21 43:16,19 44:9,24 45:17 46:17,18 51:8,11 53:7,14 54:2,16 55:10 56:23 59:23 60:12 62:2,3,11 65:17 66:17 68:19 71:19 75:9,13,16 76:15 77:13 78:14 80:1 83:9 85:3 86:2,11 87:12 89:1 90:15 91:4,7,11 92:16,20,25 96:8,25 97:10 99:10 101:2,9,17 102:13 103:18 104:16 109:12 110:5,5,7,9,15,20,22 111:8,15,18 113:21,22 114:4,20,25 116:3,10 117:3,4,6,7,18 118:24 120:19,20,21 122:1,3,4,15 123:6,7,25 124:4 126:1 127:3,22,23 129:8,14 130:5</p>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

144

<p>131:6 132:17 136:19,20 137:19,20 (138)</p> <p>area 9:18 58:4 74:25 118:16,17 (5)</p> <p>areas 6:15 43:19 79:17 117:17 118:21 127:3 (6)</p> <p>argue 127:20</p> <p>around 10:19 15:18 16:8 27:2 28:7 104:14 113:1 127:2 (8)</p> <p>art 65:22 104:7</p> <p>articulate 25:14</p> <p>aside 63:5 85:9</p> <p>ask 6:7 9:25 10:3 63:19 88:16 99:10 111:2 128:2,3 (9)</p> <p>asked 46:5 59:3 72:24 84:8 130:7 (5)</p> <p>asking 101:19 110:20,22 111:6 (4)</p> <p>asks 9:14</p> <p>assessed 101:12</p> <p>assesses 12:5</p> <p>assessment 16:21 34:7,12 82:13 101:10,15 108:5 (7)</p> <p>assessments 86:15 96:16</p> <p>assist 100:20 106:6</p> <p>assistance 53:5 78:13</p> <p>association 3:5,9 7:16,17 41:5 50:20 51:3,16 60:24 61:3,6 68:24 69:3 (13)</p> <p>association's 41:7</p> <p>associations 31:21 90:20</p> <p>assume 101:20</p>	<p>assumes 104:3</p> <p>assuming 106:15 129:13</p> <p>assurances 127:11</p> <p>assured 45:4</p> <p>astronomical 111:15</p> <p>atlantic 2:22 54:22,25 55:1,2,13 (6)</p> <p>attack 138:5</p> <p>attempted 109:22</p> <p>attempts 100:24</p> <p>attending 5:8</p> <p>attention 35:4 88:23 89:13 91:13 107:12 110:18 (6)</p> <p>attitude 65:12</p> <p>attract 8:6</p> <p>attracted 17:3</p> <p>attraction 88:7</p> <p>attractions 30:4</p> <p>attractive 76:1 93:8</p> <p>audio 30:20</p> <p>augment 34:11</p> <p>augment 17:14 18:16 20:10 25:12 35:24 47:18 50:23 54:4 62:19 67:3 80:23 99:7 (12)</p> <p>available 9:2 33:11 130:23</p> <p>avenue 2:10,18,21,22 3:8,20 4:5 15:3,10 22:4 34:5,7,21 40:25 41:3 50:16,20 51:3 54:22,25 55:1,3,13 67:21 68:7 75:2 94:8,15 97:3 99:3 107:23 108:4,11 134:11,22 138:18 (36)</p>	<p>avenues 92:12</p> <p>average 62:1 102:4</p> <p>aviles 3:17 89:6,15</p> <p>awaiting 37:9</p> <p>awarded 108:13</p> <p>away 22:19 45:14 54:5 81:22 123:16 132:21 (6)</p> <p>awful 23:22</p> <p>back 10:18 68:21 76:3 135:13 (4)</p> <p>backlash 133:1</p> <p>bag 33:1 51:23</p> <p>bagfree 14:23</p> <p>bagged 35:14 87:13</p> <p>bagging 61:22 79:7 85:24 87:24 93:20 101:22 (6)</p> <p>bags 7:21 8:5 14:3 19:9 22:12 25:6,21 31:9 37:1,9,15,25 41:14 42:7 44:21,23 45:12 46:25 47:6,23,25 50:24 51:4,8,19 56:2 58:23 61:11 62:1,3,6 63:14 64:3,15 69:12 70:17 73:8 75:6,9 81:19 82:9 83:5,8 98:18 102:5,14 109:4,4,7,9 110:2 118:3,8,10 121:11 122:20 123:3,7,8 124:5,12 127:8,18,20 129:11,19,22 130:18 (68)</p> <p>balance 40:13 67:8</p> <p>barbara 2:19 42:25 43:4</p> <p>barclays 30:4</p> <p>based 98:25 101:11 112:10 125:19 (4)</p> <p>bases 15:15 69:11 108:6</p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

145

<p>basic 109:1,24,24</p> <p>basically 23:18 48:23 117:4</p> <p>basis 130:4 131:9</p> <p>basket 7:4,23 51:19 109:24 110:3 111:5 113:2,6 126:8 (9)</p> <p>basketplus 109:23 111:5</p> <p>baskets 6:25 51:6 82:10 108:7 109:20 110:5,10 116:13 119:5 126:15 127:19 130:19 (12)</p> <p>battery 58:5</p> <p>bauer 2:18 40:19,24 41:1,2 (5)</p> <p>bayside 4:12 10:8 132:1,20 133:11 (5)</p> <p>bear 87:19 98:6</p> <p>beautification 4:7 23:14 115:13,20,25 129:4 (6)</p> <p>beautiful 32:19 42:21</p> <p>beautifying 86:4</p> <p>because 12:4,21 13:1,11 14:6,7 42:13 48:1 55:18 80:19 83:19 93:1 111:8,9,10 112:18 113:19 123:25 (18)</p> <p>becomes 115:3</p> <p>beds 115:23 116:5</p> <p>before 70:13 78:25 95:22 120:1 132:17 133:4 (6)</p> <p>beg 25:23</p> <p>began 59:8 109:20</p> <p>begin 9:10 10:6 36:1 49:17 (4)</p> <p>beginning 47:18</p>	<p>begun 51:17</p> <p>behalf 3:17 61:2 85:22 89:5,14 100:5 107:1 112:6 119:13 (9)</p> <p>behind 120:18</p> <p>being 34:24 41:8 44:5 56:24 60:9 62:9 63:18 66:17 72:5 78:10 81:1,2 84:8 87:13 95:4 100:25 110:9 116:22 117:18 119:2 127:18 130:18 (22)</p> <p>believe 17:14 30:18 80:4,13 90:11 120:1 131:9,18 (8)</p> <p>believes 59:1 69:18 78:4</p> <p>belong 17:23</p> <p>beloved 23:7</p> <p>ben 3:3 57:20,25</p> <p>benches 104:7</p> <p>benefits 45:15 91:3 107:4 110:15 (4)</p> <p>bernstein 3:18 91:18,22,25 (4)</p> <p>best 72:5,25 80:18 81:1 136:1 140:14 (6)</p> <p>betrayal 57:10</p> <p>better 45:23,24 58:25 135:11,18,19,19,20 136:22 (9)</p> <p>between 15:19 20:9 48:11 57:11 58:19 68:8 95:24 96:21 103:20 (9)</p> <p>beyond 52:8 114:18</p> <p>bid 2:10,14,18,21,22 3:5,8,12,13,20 4:5,9,12 10:8 14:21 15:3 19:6,20 20:14 21:6 24:6 26:6,12 27:7 38:22 40:25 41:3,4 43:5,17 44:4,6,10 50:16 54:22,25 55:1,13 58:3 60:24</p>	<p>61:3,5,6 65:7,10 67:21 68:1,3 69:4,18,22 70:19 72:4 74:8,17,22 77:21,24 78:1,4 79:3 80:16 84:17,18,18 85:11,20,22 87:14 92:2,8,24 94:8 95:10 99:3 101:16 102:1,3,20,22,25 103:6 105:14 106:14 107:24 108:4,11,25 109:18 110:9 116:14 118:14,18 119:11,14 123:21,22,22 132:1,18 133:20 134:11,22 138:18 (104)</p> <p>bid'er 93:20</p> <p>bid's 75:15 101:1,13,15 (4)</p> <p>bidmanaged 135:23</p> <p>bids 11:24 12:3,3,10,17,20 13:13,20 15:17 17:15,21,24,24 18:3,4 20:22 21:2 22:24 31:20 32:24 34:1,9,14 38:8,12,16 39:5,16,25 40:5,9 43:9 45:8 46:16 50:23 52:14 53:2,2 54:11,14 55:9 57:5,5,8,11 61:7,16,25 62:2,6,10,14,21,23 63:21,24 65:13 66:6,13 67:2,11,15 70:2,23 71:14,19 72:21 73:24 75:12,13 77:10 78:15 79:6,25 80:5 81:17 84:23 85:2 86:8,11,16,21 87:10,15,18,23 88:18 90:24 92:7,23 93:5 94:24 95:17,22 97:18 98:11,20,25 99:10 100:17,25 101:5,9,17,24 102:2,16 103:13 104:12,21 105:2 106:7 107:6,14 108:3 110:24 111:17 120:15 122:13 123:10,20 127:3,22 130:25 133:22 135:21 136:23 137:3,3,8,13,17 (132)</p> <p>bids' 56:13 88:13</p> <p>big 41:16 82:14 106:19 118:12 (4)</p> <p>bigbelly 31:6 58:20</p> <p>bin 92:22 136:21 137:21</p> <p>bins 24:13 56:17,18,20,22,23</p>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

146

<p>59:13,23 63:6 87:2 114:7 117:13,15,17 118:4,7 136:1,4,6,14 (20)</p> <p>bis 41:7</p> <p>bit 80:20 111:21,21,22 (4)</p> <p>blair 2:19 43:1,3,4 (4)</p> <p>block 15:15 34:6 39:14 69:11 108:6 120:8 (6)</p> <p>blocks 24:4 34:2,5 53:19 104:5,6 123:16 (7)</p> <p>blood 140:17</p> <p>bloomington 92:14</p> <p>blum 4:9 119:10,12</p> <p>bluntly 104:25,25</p> <p>board 12:7 17:19 20:2 45:1,19 55:11 75:14 76:5 79:15 105:12 107:2 (11)</p> <p>boards 5:24 96:8</p> <p>boerum 55:5</p> <p>border 132:22</p> <p>bordering 15:13</p> <p>boroughs 46:24 48:13 65:21</p> <p>both 23:12 27:24 49:7 54:14 65:16 73:1 89:20 92:11 128:22 136:7 (10)</p> <p>boulevard 34:3,20</p> <p>boundaries 92:11</p> <p>bounded 75:1</p> <p>break 110:8</p> <p>breath 74:12</p> <p>brickandmortar 103:5</p>	<p>bridge 58:4</p> <p>bring 23:5 38:14 52:24 118:12 120:15 (5)</p> <p>bringing 83:20</p> <p>broader 88:18</p> <p>broadly 115:7</p> <p>bronx 15:12 18:16 100:8</p> <p>brooklyn 2:15 29:5,21,23 30:1,5,6 31:10 32:16 55:4,4,6 58:4 68:7 81:15 89:16 94:17 112:10 (18)</p> <p>brought 133:4</p> <p>bruce 2:13 26:5,7,11 (4)</p> <p>budget 15:20 19:13 20:15,19,23 23:6 26:20 27:2 28:17 35:8,23 55:14,21 66:15 76:12 79:5 92:8 102:1,21,25 108:8,10 120:12 123:24 126:6 132:24 133:8 (27)</p> <p>budgeting 123:25</p> <p>budgets 13:16 75:16 86:12 96:8,14 (5)</p> <p>building 24:8 38:24 73:22</p> <p>buildings 100:10 117:5 120:17,20 136:8,9 (6)</p> <p>built 66:8</p> <p>bulkhead 6:13</p> <p>buonviaggio 10:21 134:6,17 138:13 (4)</p> <p>burden 49:4,20 57:2 70:6,23 76:16 77:9 87:19 90:10 98:7 (10)</p> <p>burdens 75:11 86:17</p> <p>burdensome 43:18</p>	<p>bus 102:10 103:25</p> <p>bushwick 4:6 112:3,6,10,15 113:25 114:20 (7)</p> <p>busiest 74:1 100:7</p> <p>business 2:12,16 3:19,22 4:125 7:15 13:5 15:11 19:3 21:22 29:24 33:6,17 39:21 42:19 55:9 58:7 74:20 76:25 82:20 83:1 86:14 91:20 94:15 100:2 105:6 106:25 120:2,24 121:25 126:22 132:19 133:17 139:8 (34)</p> <p>businesses 7:1 15:15 24:3 26:23 39:15 41:17 42:10,14 44:7 55:2 56:1 58:13 65:20 81:13 83:1 100:9 103:5,22 120:16,19 124:3 136:12 (22)</p> <p>busy 31:2 78:17</p> <p>buying 71:12</p> <p>byproduct 31:2</p> <p>byrne 3:17 89:4,7</p> <p>byrnes 2:11 18:20,23,24 19:1 21:19 (6)</p> <p>c 2:2 105:5 140:2,2 (4)</p> <p>call 17:13 51:12 83:7 113:23 132:8 138:10,25 (7)</p> <p>calling 9:10 10:6</p> <p>camelia 2:12 21:20</p> <p>cameras 16:11</p> <p>can 6:7 9:23 15:5 21:7,9 25:8,19 26:8 27:18 28:24 30:16,18,21 31:15 32:24 39:11 42:4,22 47:8 53:9 59:23 60:17 63:14,21 64:10 67:2,16 70:20 78:9 79:3 84:18 94:2 95:19 98:18 101:13 111:4 124:16 134:25 137:13,18 (40)</p>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

147

<p>can't 26:20,25 27:17 28:9 114:15 120:1 124:14 136:11 (8)</p> <p>canal 75:3</p> <p>cannot 13:4 18:16 38:11 44:3,13 55:18 57:9 61:23 64:14 66:11 86:15 93:3 96:14,15 114:13 (15)</p> <p>cans 13:24 23:19 31:7 34:20 35:3 41:22 61:23 64:4 79:9,17 101:1,2 102:5 122:22 (14)</p> <p>capacities 80:22 91:12</p> <p>capacity 13:12 32:21 55:19 56:13 79:18 84:2 91:2 (7)</p> <p>capital 26:1</p> <p>capriciously 71:5</p> <p>care 66:5 115:21 116:7,12 (4)</p> <p>careful 22:20</p> <p>carefully 9:7 96:9</p> <p>carted 45:14</p> <p>carter 38:2</p> <p>carting 51:2</p> <p>case 45:6 64:2 75:19 101:14 (4)</p> <p>catch 16:14</p> <p>cate 3:17 89:4</p> <p>catie 4:10 125:11,14,17 128:13,13 (6)</p> <p>cause 23:12 56:19 137:18</p> <p>caused 77:1 117:13</p> <p>causes 6:21</p> <p>causing 56:8 88:2 93:15</p>	<p>cbi 112:7,9,14 113:10,12,25 114:19 (7)</p> <p>cease 63:25</p> <p>center 4:13 30:5 135:5</p> <p>central 2:17 33:10 36:16 37:3 58:7 76:24 123:4 (7)</p> <p>centralization 70:18</p> <p>centralized 37:17</p> <p>ceo 33:9 36:15</p> <p>certain 24:21 119:24</p> <p>certainly 72:8 107:13</p> <p>certification 96:3</p> <p>certify 140:10,15</p> <p>cerullo 2:17 33:9 36:14,18,21,22 40:18 (7)</p> <p>chairman 100:5</p> <p>challenge 80:11 108:16</p> <p>challenges 16:8 17:11 59:19 88:12 96:19 (5)</p> <p>challenging 29:1 60:7 121:21</p> <p>change 74:4 88:13 92:21 104:24 122:9,9 (6)</p> <p>changes 8:7 51:11 52:1,7,10,14,19 54:9 62:12,22 (10)</p> <p>changing 133:11</p> <p>character 38:23</p> <p>characteristics 99:2</p> <p>characterized 127:16</p> <p>charged 69:4</p>	<p>chat 9:18 40:23 46:7</p> <p>chief 124:7</p> <p>chiefs 57:24</p> <p>choice 63:25</p> <p>choking 27:5</p> <p>choose 12:17</p> <p>chose 12:25</p> <p>chunk 82:14</p> <p>churchflatbush 3:14 81:8,12</p> <p>circumstances 122:16</p> <p>cite 69:16</p> <p>citibin 16:16 35:11 59:7 83:24 108:1 109:23 121:6 123:15 136:19 (9)</p> <p>citibins 28:1 47:22 78:23 79:18 121:9,13,17 124:2,14 (9)</p> <p>city 3 5:12,19,23 6:10 7:7 8:8,15 11:21 12:8,8,10 13:13 16:21 20:17 21:1,12 23:7,16,16 24:23 25:3,6,25 26:17 31:23 32:18 34:1,15 35:10,21 38:9,13,14 39:8 41:4 44:3,3,10,13 45:16,23,23 46:15,21 47:1,13 48:3,12,22 49:7,25 50:4,8 52:21,22,23 53:4,21 54:15 57:6,11,13 58:25 61:5,7,21 64:2,5,7,14,15,22 65:15 66:4 70:2 71:24 72:6,21 73:25 76:19,22 77:14 78:14 79:11,12,13 80:3,4 81:20,25 82:6 87:11,16 90:5,8 92:5,7,23,25 93:2,6,7,8,18,24,25 94:3,25 95:5,20 98:24 99:14,22 100:17,20,20,24 101:24 103:13 104:5,6 106:21 107:20 110:24 111:17,18,19,23 120:6,7,10,23 122:13 124:3,21 126:1,5 127:2 129:1 138:4 (141)</p>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

148

<p>city's 5:24 8:7,10 12:13,23 13:7 15:22 30:2 40:14 43:13,18,25 45:13 47:9 51:7 52:18 58:6 61:10 69:5 85:4 95:8 105:14 107:4 121:10 (24)</p> <p>citywide 44:5 103:18</p> <p>civil 8:2</p> <p>claim 74:9</p> <p>claims 86:19</p> <p>claire 4:13 135:4</p> <p>clarify 6:20 54:1 113:3</p> <p>clarifying 87:17</p> <p>clarity 87:22 96:20 113:8</p> <p>clean 4:6 10:12,15 13:18 15:25 32:10,18 33:23 34:18 42:21 45:8 53:12 64:14 66:1 67:11 70:24 72:3 73:2 75:8 78:2 79:21 81:25 82:5 85:5,25 88:11 90:22 92:6 93:3 99:9 100:22 106:23 110:1 112:3,6,22 114:12 116:5,18 120:23 121:5 124:2,21 126:1,11,18 127:2 138:4 (48)</p> <p>cleaned 58:21</p> <p>cleaner 8:13 13:4 14:23 33:1 82:21 92:17 94:3 99:13 107:5 112:19 133:5,5 (12)</p> <p>cleaning 6 5:17 6:21,23 8:8 22:16 25:20 64:22 71:18 114:23 132:12 133:10 (12)</p> <p>cleanliness 19:7 45:21 69:16 112:11 114:18 (5)</p> <p>cleanly 117:19</p> <p>cleanness 25:3</p> <p>cleanup 113:3,10 128:15,19 129:4,9 130:5,7,17 134:2,15 138:11 (12)</p>	<p>cleanups 112:13,14,18,22 113:18 114:22 129:25 (7)</p> <p>clear 14:18 22:3 30:23 61:9 70:25 90:23 98:22 103:2,3 120:9 (10)</p> <p>clearing 27:4</p> <p>clearly 9:22 37:3 44:2 127:14 (4)</p> <p>climate 114:3</p> <p>clock 104:13,14</p> <p>close 63:15 139:1,7</p> <p>closing 49:5,19</p> <p>cobble 55:5</p> <p>code 6:10 7:7 8:1,4 (4)</p> <p>codify 122:4</p> <p>cold 23:22</p> <p>collaborate 40:5</p> <p>collaborating 32:12 82:19 88:19</p> <p>collaboration 59:10 95:9 106:17 124:23 (4)</p> <p>collaborative 43:10</p> <p>colleague 73:16</p> <p>colleagues 28:23 94:21</p> <p>collect 12:17 24:23 47:8 61:25 98:1 101:4 113:15,19 127:25 (9)</p> <p>collected 47:6 51:1 58:17 71:21 108:23 126:12,19 127:9 130:3 (9)</p> <p>collecting 27:16 51:22 113:22</p> <p>collection 6:18 7:9,12,22 8:12</p>	<p>18:4,7 44:22 51:21 52:2 59:9,14 69:13 71:11,21 89:25 97:19 109:5 126:9 129:20 130:19 (21)</p> <p>collections 31:5</p> <p>collects 36:25 113:12</p> <p>collins 3:14 81:7,9,11 (4)</p> <p>columbus 92:11</p> <p>columbusamsterdam 3:19 91:20 92:2</p> <p>combat 33:22</p> <p>come 10:18 14:21 23:23 27:6 49:21 51:5 52:14 68:20 84:9 121:24 (10)</p> <p>comes 21:6 24:24 53:5 64:9 71:21,22 77:5 116:8 (8)</p> <p>coming 139:11</p> <p>commend 46:19</p> <p>comment 11:22 19:5 33:13 40:23 (4)</p> <p>comments 5:14 8:19,21,23,24 9:3,7,9 46:6 68:2 105:20 128:25 139:4,7 (14)</p> <p>commercial 5:16 6:11 12:15 22:25 23:4 25:6,10,20 30:3 33:23 34:13 39:14 58:10 77:12 84:15 93:21 98:2,10 100:8,10 101:11 108:3,19 110:13 112:25 115:22 116:13 118:17 136:8 137:4 (30)</p> <p>commissioner 16:7 59:4 120:14 125:4 (4)</p> <p>commissioners 122:8</p> <p>commitment 8:7</p> <p>committed 64:6 88:19 99:18 107:2 (4)</p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

149

<p>committee 55:7</p> <p>communities 7:2 34:14 37:5 66:1 84:21 85:7 99:21 114:9 131:7 (9)</p> <p>community 3:14 5:24 6:3 15:14 19:8 23:14 26:13 27:18 28:20,25 39:15 42:1 54:24 75:22 81:8,12,22 82:21,24 83:14 84:20 90:2 92:9 93:4,11 96:5 112:9,18,21 113:3,17 114:2,14 116:4,15,20,24 117:2 118:19 125:19 126:11 128:15,19 129:3,8,25 130:12 133:2,23 135:23 (50)</p> <p>community's 115:17</p> <p>commuters 45:17</p> <p>compactors 58:20</p> <p>companies 122:25</p> <p>company 51:2</p> <p>compare 24:1,2,6,7 (4)</p> <p>compared 91:5</p> <p>compelled 94:21</p> <p>complete 128:2 130:9</p> <p>completely 26:19</p> <p>complex 63:1 67:7</p> <p>complexity 62:15</p> <p>compliance 2:3 5:5 31:20 52:15,21,23 56:11 57:2 76:9 86:20,23 87:19 88:17 96:4 98:7 99:7 104:2 106:1 (18)</p> <p>compliant 17:16 98:21</p> <p>complicated 39:4</p> <p>comply 12:1 13:7 28:10 39:7 48:8 54:13 55:21 63:21 66:17 78:11 90:25 102:24 (12)</p>	<p>comprised 92:19</p> <p>compromise 14:15</p> <p>concern 77:16</p> <p>concerned 19:16 60:12 62:19 75:9 78:10 129:2 133:13 136:5 (8)</p> <p>concerning 8:19 76:24</p> <p>concerns 6:4 16:10 71:6 86:7 89:10 94:22 107:9 132:25 133:19 (9)</p> <p>conclusion 40:6 104:10 106:24</p> <p>conditions 122:5</p> <p>conduct 16:11</p> <p>conducted 16:5</p> <p>conducting 5:10</p> <p>conflicts 14:16 104:20</p> <p>confusion 63:7 87:20</p> <p>connect 133:20</p> <p>consequence 37:6</p> <p>consequences 39:3 88:18 97:16</p> <p>consider 9:7 14:9 28:22 63:19 66:14 72:1 86:20 88:16 90:18 98:13 105:24 106:2 118:6 130:7 139:3 (15)</p> <p>consideration 99:23 135:22</p> <p>considered 51:24 52:7 62:10 63:18 65:14 (5)</p> <p>considering 54:18</p> <p>consistency 98:16</p> <p>consolidation 106:4</p>	<p>constantly 26:18 41:20 42:4 56:23 117:11 (5)</p> <p>constraints 93:14 99:1</p> <p>construction 60:4</p> <p>constructive 86:8</p> <p>consultation 95:21</p> <p>consulted 86:22</p> <p>consulting 47:14</p> <p>consuming 97:9</p> <p>container 52:1 53:13,20 66:22,25 71:12 73:18 83:24 96:21 97:1 98:23 109:25 (12)</p> <p>containeration 110:14</p> <p>containerization 12:14,25 13:3,10 16:15,18 20:24 21:7 31:18 33:20 35:6 37:12 39:21 40:7 43:8 47:10 49:22 50:12 59:1,5 60:17 62:4,25 65:12 69:19,24 70:12,16 71:9 73:9 74:8 77:9,15 78:5,8,12 80:24 84:22 87:5 88:8 89:12,22 90:9 91:4,10 94:23 98:15 101:22 102:6 104:15 108:2,19 111:3 135:12,15,17 136:7,15 (58)</p> <p>containerize 6:6 11:25 31:25 32:8 56:16 67:3 72:7 101:5 109:9 110:2 (10)</p> <p>containerized 59:10 73:11,14 79:1 109:6 135:25 137:11 (7)</p> <p>containerizes 13:25 73:20,23</p> <p>containerizing 61:12 66:10 70:10 77:11 78:22 102:14 109:7 (7)</p> <p>containers 8:11 14:8 16:23,23 17:3,10 19:22 24:10 32:4,9 35:11,12 37:17 39:7,10,18 44:9,17 47:22 48:1,10 50:25 52:4 53:1,6,9 57:17 59:8,25</p>
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

150

<p>62:16 63:5,9 68:12 71:15,16 73:19 82:6 83:6,11,16,21 84:3,4,23 87:23,25 88:1 89:24 96:23 98:21 102:8 106:8,11 108:12,14,15,25 109:13 111:20 122:21 129:12 (61)</p> <p>contentious 80:6</p> <p>contents 44:23</p> <p>continue 21:11 28:24 32:17,23 126:17 131:8 (6)</p> <p>continued 3:2 4:2 52:18 60:19 76:4 91:7 (6)</p> <p>continues 21:13</p> <p>continuing 35:19 40:5 42:18 107:18 (4)</p> <p>contract 34:15 44:2 45:25 101:23 103:15 106:9 120:6 (7)</p> <p>contracted 35:24</p> <p>contractor 55:15,17</p> <p>contracts 76:21 86:12 96:10 111:11 (4)</p> <p>contractual 100:18</p> <p>contrary 95:14</p> <p>contribution 45:22</p> <p>control 32:1 59:22 68:11 80:8 (4)</p> <p>controlling 105:16</p> <p>convenient 127:24</p> <p>conversation 80:6</p> <p>conversations 83:23 91:8</p> <p>convey 77:15</p> <p>cooperation 20:2 60:19 95:17</p>	<p>coordinate 17:8 98:23</p> <p>coordinating 88:5</p> <p>coordination 22:21 63:16 69:23 104:12 (4)</p> <p>coordinator 54:25</p> <p>copies 5:22</p> <p>copy 9:2</p> <p>cordelia 3:13 77:19,23</p> <p>core 38:10 75:21 121:1</p> <p>corey 3:12 74:16,19</p> <p>corner 22:12 78:9,17 79:2,8,16 110:3 (7)</p> <p>corners 24:4 41:19 42:1,10,20 44:22,24 108:7 121:12 (9)</p> <p>correct 80:21,22</p> <p>correlation 103:20</p> <p>corridor 28:14,20 56:9,21 108:19 109:21 110:14 116:13 (8)</p> <p>corridors 23:4 25:7,20 33:23 34:13 35:1 64:5 75:24 84:16 98:10 108:3 115:22 (12)</p> <p>corridors' 25:10</p> <p>cost 16:17 20:1 31:23 35:7 43:18 44:11 48:11,14 52:9,25,25 53:3 76:8,16 77:10 83:10,12,12 84:4,24 88:9 109:16 111:14 121:9 133:16 (25)</p> <p>costly 87:21</p> <p>costs 22:22 28:3 76:10,11 86:20,22 96:4,12 102:17 109:8,11 123:20 (12)</p> <p>could 24:10,14 28:3 52:22</p>	<p>76:6 83:18 86:23 87:20 88:7 89:20 96:10 109:15 135:17 136:3,15 137:9 (16)</p> <p>couldn't 123:14</p> <p>council 3:17 16:6 46:21,23 48:4,22 49:2,25 50:8 51:15 89:5,15 90:8 118:20 120:6 (15)</p> <p>counsel 2:4 5:6</p> <p>count 51:23</p> <p>counter 120:24</p> <p>counteracts 110:18</p> <p>counterproductive 122:12</p> <p>countless 98:9</p> <p>county 140:6</p> <p>couple 68:4</p> <p>course 41:7,13 104:19</p> <p>court 20 8:16 9:22</p> <p>cover 29:25 73:24 92:11 108:5 111:20 123:20 (6)</p> <p>coverage 73:19</p> <p>covers 34:2</p> <p>covid19 75:25 77:2</p> <p>create 11:23 18:13 23:4 24:24 65:22 67:12 98:19 110:20 113:11 (9)</p> <p>created 49:16 95:10,11 120:25 124:22 (5)</p> <p>creates 67:13 104:20</p> <p>creating 8:12 82:24 113:21</p> <p>creative 74:25</p> <p>crew 35:14 58:22 82:8</p>
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

151

<p>crews 31:4,8 49:11</p> <p>cripple 28:19</p> <p>critical 22:23 23:13 38:13,20 96:1 107:13,19 120:22 (8)</p> <p>crowded 102:13</p> <p>crown 10:12,16 134:3,15 138:11 (5)</p> <p>crucial 40:1</p> <p>culprits 16:14</p> <p>cultural 30:6 69:6</p> <p>curb 37:9 53:14 57:13 70:12 87:4 102:11 (6)</p> <p>curbs 6:24 32:10 53:12 70:24 75:8 79:22 82:5 121:5 126:14,18 (10)</p> <p>curbside 32:9 97:4 103:24 136:2,24 (5)</p> <p>current 17:17 59:25 66:7 108:1 130:20 (5)</p> <p>currently 35:8 45:9 49:2 51:4 53:7 59:23 77:3 92:1 97:4 99:4,8,15 108:6 109:2 110:10 112:24 124:11 129:15 (18)</p> <p>customers 41:25</p> <p>cut 23:13 55:22 68:14 134:11 (4)</p> <p>cuts 126:6</p> <p>cutting 30:11,13 91:1</p> <p>daily 45:18 58:17 69:6 92:5,20 93:24 121:19 130:4 131:9 (9)</p> <p>dalipi 3:21 99:25 100:3,4 (4)</p> <p>damage 84:11 91:5</p>	<p>dan 3:10 72:11</p> <p>daniel 3:18 72:16 91:18,24 (4)</p> <p>dark 66:11</p> <p>data 51:23 108:23</p> <p>datadriven 25:4</p> <p>date 5:20 20:21</p> <p>dates 94:1</p> <p>david 3:7 67:19,24 100:6 134:9,20 138:16 (7)</p> <p>day 14:11 23:1 31:8 35:5 42:5 46:18 53:17 58:23 59:14 62:1 66:6 69:13 81:24 82:8 103:17 139:12 140:20 (17)</p> <p>days 48:17,17 123:2 126:16 133:9 (5)</p> <p>dbp 31:3,17</p> <p>de 2:15 29:8 33:5,12,15 (5)</p> <p>deadline 8:22 54:10 79:19 80:24 99:7 (5)</p> <p>deaf 27:21</p> <p>deal 78:21 79:2</p> <p>debris 27:5 42:8,12 97:21 (4)</p> <p>decades 104:22</p> <p>decades' 51:18</p> <p>december 5:19</p> <p>decision 117:14</p> <p>decisionmaking 20:11</p> <p>decisions 66:13 131:6</p> <p>decline 77:1</p>	<p>dedicated 31:3 39:23 82:17 87:6 102:1 (5)</p> <p>dedicates 12:6 36:23</p> <p>dedicating 85:3</p> <p>dedication 11:21 126:2</p> <p>deep 72:1 74:12 77:16 94:22 (4)</p> <p>deeply 62:18 132:23</p> <p>defecation 17:5</p> <p>definitely 80:11 81:23 84:11 137:12 (4)</p> <p>degraded 97:22</p> <p>delay 36:11</p> <p>delayed 36:3</p> <p>delivered 41:8</p> <p>demand 130:5</p> <p>demands 12:23 97:5,12,13 (4)</p> <p>demonstrating 71:9</p> <p>denied 110:4</p> <p>dense 97:1</p> <p>density 38:24</p> <p>dep 117:25</p> <p>department 4 2:5 5:6 6:17 7:9,12,21 11:18 12:12,19,21 13:22 14:14,19 15:23 37:10 41:11 50:11 51:1 52:12 57:25 59:6 60:9,20 87:3 91:14 93:2 97:7 107:15 125:25 126:7 127:12 135:16 139:3 (34)</p> <p>deployed 92:20</p> <p>depot 31:11</p>
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services

February 10, 2025

152

<p>deputy 3:21 100:1 125:3</p> <p>described 7:5,24</p> <p>design 4:13 19:22 20:23 135:5,13 (5)</p> <p>designated 88:3 98:17 106:3 114:1 129:23 (5)</p> <p>designating 57:15</p> <p>desirable 13:19 57:7</p> <p>desire 13:11 39:7</p> <p>desired 25:16</p> <p>despite 60:9 87:17 96:3 127:11 (4)</p> <p>detailed 39:8</p> <p>details 90:14 119:7</p> <p>determines 12:8</p> <p>detrimental 89:25</p> <p>devastating 113:24 117:23</p> <p>develop 37:13 70:21 88:20 98:22 99:19 106:20 (6)</p> <p>development 3:6 49:8 60:5 65:1,6 92:9 93:4 (7)</p> <p>devise 25:8</p> <p>dhs 17:9</p> <p>dialog 86:9</p> <p>dicus 2:21 50:15,17,18 (4)</p> <p>difference 12:14</p> <p>differences 39:1</p> <p>different 38:23 51:24,25 53:17 96:6 118:16 133:24 137:2,2,7,8 (11)</p>	<p>difficult 16:13,14 39:2 102:9 104:2 (5)</p> <p>dining 71:24</p> <p>direct 26:12</p> <p>direction 76:5</p> <p>directly 8:25 31:10 71:16 84:17 106:14 139:10 (6)</p> <p>director 2:3,12,13,15,20 3:6,7,9,13,14,18,20,21 4:5 5:4 15:10 19:21 21:21 26:5 29:9 33:5,16 46:10,13 61:4 65:1,6 67:20,25 68:23 69:2 77:20,24 81:7 91:19 92:1 94:7,14 100:1 107:23 134:10,21 138:17 (43)</p> <p>directors 12:7 20:2 45:20 55:12 75:15 76:6 79:16 (7)</p> <p>dirk 2:15 29:8 33:4,14 (4)</p> <p>dirty 19:18 73:7</p> <p>dirty 38:5 93:16</p> <p>disadvantaged 114:2</p> <p>disappear 22:14 109:21</p> <p>disappointed 95:7</p> <p>disapproval 97:13</p> <p>disconnect 95:23</p> <p>discontinue 97:18</p> <p>discourage 64:20</p> <p>discrete 96:5</p> <p>discretion 45:1,19 76:7 122:6 (4)</p> <p>discuss 6:4 16:8</p> <p>discussed 99:4</p> <p>discussion 105:13</p>	<p>discussions 18:11 88:25 107:15</p> <p>dismay 33:24</p> <p>dismayed 119:21</p> <p>displacement 26:16</p> <p>disposal 37:4 110:16</p> <p>dispose 113:15 115:2</p> <p>disrespect 24:22</p> <p>disrupted 59:17</p> <p>disrupting 127:25</p> <p>disservice 111:22</p> <p>district 2:12,16,19 3:9,16,19,22 4:4 7:15 12:5,7 13:18 15:11,24 16:1,5,19 18:15 19:3,10 21:23 27:11 30:6 33:7,17 43:2,5,12,23 48:6 53:6,18 58:6,8,16 66:24 68:24 69:3,6 71:4 74:21,24 75:9,17,19,25 76:25 77:4,12 78:9 80:12,19 85:17 86:13 89:16,18 91:21 94:16 96:9 99:1 100:2,8 101:14 105:7 106:25 118:18,20 120:5 132:19 133:17 (70)</p> <p>district's 80:15</p> <p>districts 13:6 29:25 41:19 42:20 43:17 44:4 46:23 49:2 55:10 61:19 65:16 118:15 120:3,25 122:1 126:23 (16)</p> <p>diverting 86:25</p> <p>dock 6:13 137:5</p> <p>documents 130:21</p> <p>doe 11:2,3</p> <p>does 17:23 22:15 27:6 39:1 45:16 55:17 56:10 63:10 73:21 75:19 81:24 88:14 90:5,9</p>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

153

<p>93:22 98:9 99:5 104:10 120:10 129:16 131:16 (21)</p> <p>doesn't 32:21 88:13 102:25 118:10 137:10 (5)</p> <p>doing 23:17 24:22 27:16 31:14 32:20 40:10 42:6 46:18 57:9 78:2 93:19 111:13 (12)</p> <p>dollars 13:16 19:12,14,25 45:10 48:12,19 51:13 86:24 96:11 (10)</p> <p>done 49:24 50:9 133:21 136:16 (4)</p> <p>doors 49:6</p> <p>dot 18:11 23:25 24:14 53:25 59:8 62:16,17 72:22 80:13 87:4 91:8 104:17 121:7 123:9,14 (15)</p> <p>double 28:3</p> <p>down 52:24 83:19 136:11</p> <p>downtown 2:15 3:4 29:5,20,23 30:1 31:10 32:16 55:6 57:22 58:2,3 (12)</p> <p>dozens 127:1</p> <p>dr 2:12 21:20</p> <p>draconian 61:14 63:17</p> <p>dramatic 74:4</p> <p>drastic 101:6</p> <p>draw 123:8</p> <p>drop 83:14</p> <p>dropping 129:11,20</p> <p>drug 17:6</p> <p>dsny 5:10,18,21 6:2,2 9:2,6 16:7,11 17:9 18:2,4,6,11 19:15 22:3 23:2,11,25 24:14</p>	<p>25:4,15,19 27:14 28:2 31:10 32:13,21 36:11 38:1,17 39:19 40:2,11 42:17 43:7,16 44:1,8,18,22 45:3 47:6,7,14,23 50:7,22 55:17,18 57:9 59:11,12 61:17,24 62:7,8 63:16,19 64:7,8,14 67:2,10,16 69:13,25 70:7,11,15 71:8,14,25 78:11 79:9,23 80:13 81:2,24 83:3 84:5,14 85:8 86:3 87:24 88:5,20 89:9 90:17 91:8 92:3 93:25 94:23 95:13 98:19 99:19 101:3,19 103:7,17 105:24 106:5,15,18 107:3 108:15,20,23 109:14,16 110:4,6,20,22 111:2,7,12 112:19 113:14 114:13 115:7 116:9 117:14 119:16 120:1,10,23 121:8,19,22 123:10 124:21 128:4,22 129:18,22 130:2,7,16 131:11 132:10 133:20 137:1,14,21 138:3 (146)</p> <p>dsny's 5:15 27:7 31:13 32:10 65:11 69:10 71:20 82:5 89:11 90:3 96:3 111:13 118:23 121:4 (14)</p> <p>due 21:4 23:21 61:21 71:6 73:13 93:13 102:17 (7)</p> <p>dumbo 3:16 85:16,20</p> <p>dumped 14:7</p> <p>dumpers 38:7</p> <p>dumping 14:12 16:1,9,11 17:6 41:21 42:3,13 68:9 78:18 93:17 103:23 106:16 110:17 113:24 (15)</p> <p>durable 110:8</p> <p>during 55:24 75:24 98:17</p> <p>e 2:2,2 140:2,2 (4)</p> <p>each 12:4,6 14:21,22 25:9 31:8 38:22 46:21 73:3 75:15 80:14 84:17 85:9,11 101:10,13 118:15 133:20,23 (19)</p>	<p>eager 51:8</p> <p>earlier 124:8 134:12</p> <p>easier 84:25 110:6 113:14</p> <p>easily 64:10</p> <p>east 2:11 18:21 19:1 26:13 58:5 75:2 (6)</p> <p>eastern 117:2</p> <p>echo 68:2 94:19 133:18</p> <p>economic 49:18 77:1</p> <p>ed 81:11</p> <p>effect 113:16</p> <p>effective 12:4 71:7 88:9</p> <p>effectively 60:18 99:21 112:21</p> <p>efficiency 32:14 98:16</p> <p>efficient 130:1 136:4</p> <p>effort 15:22 43:13 59:2 82:1 87:3 (5)</p> <p>efforts 12:15 13:18 32:15 71:8 82:23 87:15 88:8 90:2,21 97:17 105:15 113:25 114:11 119:20 129:1,4 (16)</p> <p>egregiously 45:5</p> <p>eight 16:22</p> <p>either 14:6 28:12 47:20 122:20 (4)</p> <p>electedofficials 18:12</p> <p>eliminate 48:23 122:10</p> <p>eliminated 57:2</p> <p>elimination 48:25</p>
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

154

<p>ellis 3:20 94:6,9,13 (4)</p> <p>else 122:24 124:16 138:20</p> <p>elsewhere 42:14</p> <p>elvers 3:14 81:6,9,11 (4)</p> <p>email 119:8</p> <p>emailed 8:24</p> <p>empire 24:13 136:21</p> <p>employees 58:12 92:19</p> <p>emptied 61:24 126:14</p> <p>empties 13:24</p> <p>empty 35:5</p> <p>emptying 6:24 34:19</p> <p>encampments 17:5</p> <p>enclosures 136:19</p> <p>encourage 42:17 74:11 105:24 106:17 131:7,10 (6)</p> <p>end 16:4 21:3 22:25 50:13 51:17 60:21 138:2 (7)</p> <p>endeavor 65:15</p> <p>ended 10:5</p> <p>ending 83:8 84:10</p> <p>ends 78:16 119:4</p> <p>enforcement 2:4 5:5 39:20 42:3 103:21 106:11,16 114:7 (8)</p> <p>engage 91:7 128:4</p> <p>engaged 6:2</p> <p>engagement 54:24 70:1 137:24</p>	<p>engaging 6 5:17 112:15</p> <p>enhance 32:13</p> <p>enormous 31:1,12</p> <p>enormously 53:24</p> <p>enough 61:24 79:18 135:22</p> <p>ensure 70:19 71:1 88:25 98:16 104:13,14 114:25 123:9 (8)</p> <p>ensuring 23:3 48:15</p> <p>enthusiastically 119:17</p> <p>entirely 97:19</p> <p>entirety 29:25</p> <p>entities 5 5:16 38:6 89:24 137:17 (5)</p> <p>entity 6:20 7:14,19 14:11 24:7 116:1,4 (7)</p> <p>environment 97:2</p> <p>equally 103:19</p> <p>equipment 28:6 45:12 124:1</p> <p>equitable 89:2 107:3</p> <p>equity 111:7</p> <p>especially 23:25 100:13 104:4,5 (4)</p> <p>esq 2:3</p> <p>essential 47:12 59:15 85:23 87:1 92:25 95:1 100:23 (7)</p> <p>essentially 101:20</p> <p>establish 18:3 70:25 98:17 106:18 (4)</p> <p>established 18:6</p>	<p>estate 58:11</p> <p>estimate 19:24 35:6 48:14 76:8 (4)</p> <p>estimated 48:11 52:8 82:15</p> <p>estimating 52:9</p> <p>estrada 3:7 67:19,22,24 68:14,17,21 134:9,20 138:16 (10)</p> <p>etcetera 23:15</p> <p>evaluate 137:16</p> <p>evaluating 39:24</p> <p>even 14:9 16:2 22:23 35:22,23 39:16 57:1 68:11,11 79:2 126:3 (11)</p> <p>events 23:14 65:23 82:24 83:14 (4)</p> <p>eventual 38:1</p> <p>eventually 123:5</p> <p>ever 78:3</p> <p>everchanging 130:5</p> <p>every 28:16 46:18 48:4 66:6 69:13 81:24 82:8 110:2 116:6 119:17 (10)</p> <p>everybody 11:6 21:25 91:24 128:12 138:7 (5)</p> <p>everyday 95:19</p> <p>everyone 6:7 15:5 21:11 26:8 40:20 41:1 85:19 89:8 99:19 100:3 122:24 131:4 139:2,11 (14)</p> <p>everyone's 41:13</p> <p>everything 138:3</p> <p>everywhere 116:22</p>
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services

February 10, 2025

155

<p>exactly 71:19 132:7</p> <p>example 53:11,14 100:25 106:1 136:22 (5)</p> <p>exceed 48:18</p> <p>except 6:16 7:7</p> <p>exception 70:22</p> <p>exceptions 98:24</p> <p>excess 46:24 48:10</p> <p>excessive 24:16</p> <p>exclude 130:12</p> <p>execute 56:10</p> <p>execution 22:22</p> <p>executive 2:4,12,13,15,20 3:7,9,13,14,18,20 4:5 5:5 15:10 19:20 21:21 26:5 29:9 33:5,15 46:10,12 61:4 67:20,25 68:23 69:2 77:20,23 81:7 91:19,25 92:1 94:7,14 107:23 134:10,21 138:17 (39)</p> <p>exert 14:16</p> <p>exigent 122:16</p> <p>existential 50:2 105:1</p> <p>existing 23:18 40:3 44:1 76:21 93:13 (5)</p> <p>exists 113:23</p> <p>expanding 66:23</p> <p>expands 115:23</p> <p>expect 67:2</p> <p>expected 90:25</p> <p>expedited 66:8</p> <p>expense 16:20 21:5 31:19</p>	<p>48:23 101:2,16 (6)</p> <p>expenses 48:21,21 86:25 96:13 102:20 (5)</p> <p>expensive 20:16 47:17 110:7 136:20 (4)</p> <p>experience 23:5 84:1</p> <p>experiences 40:4</p> <p>experiencing 14:10 132:8</p> <p>explaining 97:11</p> <p>explanation 90:23</p> <p>explicit 76:5</p> <p>exploring 88:3</p> <p>express 33:24 47:2</p> <p>expressed 94:20</p> <p>extent 61:13</p> <p>extenuating 122:15</p> <p>extraordinary 49:19</p> <p>extremely 104:2 121:20</p> <p>f 140:2</p> <p>fabulous 116:10</p> <p>face 38:7 44:13,20 60:14 97:24 (5)</p> <p>faced 83:4</p> <p>faces 107:6 120:8</p> <p>facilitate 70:18</p> <p>facilities 32:2</p> <p>fact 27:6 31:25 37:12 73:10 (4)</p> <p>failed 108:20</p>	<p>failing 12:1</p> <p>fails 86:20 95:25</p> <p>failures 108:21</p> <p>fair 88:21 106:11</p> <p>falco 4:11 128:10,12,18 (4)</p> <p>falling 56:7</p> <p>families 26:23</p> <p>far 66:12</p> <p>fast 61:24</p> <p>fault 42:14</p> <p>fear 17:9</p> <p>feasibility 96:2</p> <p>feasible 24:18 61:13 85:11 89:2 (4)</p> <p>feature 69:17</p> <p>february 12 5:21 140:20</p> <p>feedback 109:1 119:21</p> <p>feel 25:18 73:9 79:12 94:21 (4)</p> <p>feels 87:16</p> <p>feet 58:10</p> <p>fellow 65:10</p> <p>fernandez 2:13 26:4</p> <p>few 9:6 20:7 32:9 68:21 78:6 137:9 (6)</p> <p>fewer 83:18</p> <p>fields 4:125 105:6,8</p> <p>fifth 2:21 50:16,20 51:3 134:11,22 138:18 (7)</p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services

February 10, 2025

156

<p>fight 111:15</p> <p>figure 22:7 137:13,17</p> <p>figures 58:15</p> <p>figuring 118:23</p> <p>fill 31:12 35:3 38:13 87:15 100:23 114:14 (6)</p> <p>filled 56:2 101:2</p> <p>filling 130:21</p> <p>fills 82:8</p> <p>film 122:25</p> <p>filming 123:2</p> <p>filter 114:22</p> <p>final 54:5 84:9</p> <p>finally 22:21 25:2 39:4 76:25 123:18 (5)</p> <p>financed 34:9</p> <p>financial 38:16 49:20 63:23 70:8 75:10 76:13 78:7,13 86:17,21 88:16 90:10 91:2,5 93:14 96:2 99:5,6 106:4 107:9 (20)</p> <p>financially 62:13 64:17 91:10</p> <p>find 20:18 36:5,5 39:13 40:12 60:7,11 84:17 85:10 107:3 117:20 123:10,11 133:21 (14)</p> <p>finding 35:16 102:8 121:20</p> <p>fine 30:17 64:20 93:18 120:2 122:13 (5)</p> <p>fined 34:24 87:18</p> <p>fines 12:1 13:23 17:24 18:5 31:20 35:25 42:12 44:20 45:5 47:18 56:4 76:19 87:9,12,14 97:25 98:6 103:6 106:13</p>	<p>119:24 122:10 127:9 (22)</p> <p>fining 14:10 57:1</p> <p>finish 10:3,19</p> <p>first 10:7 19:20 28:4 34:5,6 37:22 79:21,22 83:9 92:3 103:11 105:11 121:1,3,13 122:10 128:21 132:4,9 (19)</p> <p>firstly 101:9</p> <p>fiscal 17:17,19 20:12 58:17 78:23 102:22 (6)</p> <p>fits 38:21 104:3</p> <p>five 40:21,21 46:23 48:11,13 65:21 110:2 126:16 (8)</p> <p>fiveandahalf 45:10</p> <p>fivemodule 121:6</p> <p>fiveunit 121:18</p> <p>flatbush 3:20 81:15 94:7,15 97:3 99:3 (6)</p> <p>flaw 120:17</p> <p>flawed 19:17</p> <p>fleet 47:24 48:15</p> <p>flexibility 53:22 63:11,20,22 97:10 (5)</p> <p>flexible 53:8 80:14</p> <p>flooding 114:21 115:4</p> <p>flow 27:4</p> <p>fluctuations 67:6</p> <p>focus 40:3 71:8 114:23</p> <p>focuses 113:25</p> <p>folks 41:20 46:17 48:4</p>	<p>followed 33:8</p> <p>following 2:8 3:2 4:2 70:11 130:8 (5)</p> <p>food 8:9 104:7</p> <p>fooddrink 35:2</p> <p>foot 38:24 77:5</p> <p>footage 101:12</p> <p>force 83:14 93:10 97:17</p> <p>forced 66:13,17 78:11</p> <p>forcing 81:17 84:19</p> <p>fordham 3:21 100:1,7 101:25 102:9,22,25 103:4,12,22,24 (11)</p> <p>fordham's 101:14</p> <p>formal 135:8</p> <p>formation 34:17</p> <p>formed 19:6 78:1 79:6 126:10 (4)</p> <p>former 16:7 74:23 120:14</p> <p>forthcoming 98:14</p> <p>forward 18:10 21:10 59:2 67:16 72:4 87:5 88:24 90:7 107:4,18 111:4,19 (12)</p> <p>found 64:8</p> <p>foundation 124:24 128:23 129:16 130:16 (4)</p> <p>founder 125:18 128:19</p> <p>four 48:11 83:11,16 104:21 109:13 (5)</p> <p>fourandahalf 48:18</p> <p>francesca 2:13 26:4,11</p>
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

157

<p>frank 22:7</p> <p>frankly 20:8 37:20 127:10</p> <p>freaked 116:21</p> <p>fred 2:17 33:8 36:14,22 (4)</p> <p>free 33:1 34:23 65:22 82:24 129:10 (5)</p> <p>friends 23:1</p> <p>front 103:9 122:21,21 124:14 136:14 (5)</p> <p>frontage 101:11</p> <p>frontier 26:14</p> <p>frontlines 64:21</p> <p>fruitful 57:10</p> <p>frustration 65:11</p> <p>full 16:17 46:25 47:22 73:19 77:10 119:1 129:14 (7)</p> <p>fully 25:17 38:11 39:23 59:9 78:11 105:14,20 107:2 (8)</p> <p>fulton 30:3</p> <p>function 55:9 59:21 60:17 107:7 115:1 135:1 138:22 (7)</p> <p>functional 28:14</p> <p>fund 11:2,3 35:10 38:2 48:4 106:6 (6)</p> <p>fundamental 113:9</p> <p>funded 101:9</p> <p>funding 20:19 21:1 24:24 34:11 35:17,23 55:19 73:13 79:14,15 102:24 104:12 123:19 (13)</p> <p>funds 52:24 56:10,20 71:15 81:18 87:1 (6)</p>	<p>further 18:10 27:2 87:22 88:25 102:20 107:15 140:15 (7)</p> <p>future 66:14 105:1 128:6 131:11 (4)</p> <p>fy 20:14 78:24 108:7 109:4 (4)</p> <p>gallon 63:6,9 136:1</p> <p>gallons 31:9 88:2</p> <p>gap 87:15</p> <p>gaps 31:13 38:13 100:23 114:15 (4)</p> <p>garage 82:3 125:5 132:15</p> <p>garages 14:2</p> <p>garbage 12:16,17,18 13:1,7,24,25 14:2,6,8,11 37:4 38:4 43:14 44:21 46:25 47:6,23,24 48:1,16 50:25 51:5 61:12 77:6 78:19,20 79:8,12 81:15 101:6 123:1,7 129:19,21 (35)</p> <p>gardens 114:20,24,25 115:3 117:23 (5)</p> <p>garment 2:19 43:1,5,12,23 (5)</p> <p>gather 82:9</p> <p>gcp 37:6,11,24 38:6 39:5,16 (6)</p> <p>gda 44:15,25</p> <p>general 131:16</p> <p>generally 75:1</p> <p>generated 37:2,24 44:24 98:2 (4)</p> <p>generates 58:16</p> <p>generation 38:25</p>	<p>genuinely 25:23</p> <p>get 64:15 67:4 75:6 79:15,19 118:24 123:5 126:3 (8)</p> <p>getting 35:20,22 51:7 61:10 62:11 73:8 117:8 121:11 131:5 (9)</p> <p>ghost 16:13</p> <p>give 25:13 28:21 54:11 116:25 (4)</p> <p>given 2:8 3:2 4:2 13:1 49:16 58:15 100:13 (7)</p> <p>gives 63:4</p> <p>giving 22:1</p> <p>glad 81:25</p> <p>go 78:25 82:23 83:18 114:17 (4)</p> <p>goal 14:2,5 35:9 51:7,10 52:17 54:17 57:12 61:10 63:12,13,17 73:4 77:8 79:10 86:3 99:13,17 115:6 120:15 121:9 (21)</p> <p>goals 19:15 36:8,8 37:11 40:14 41:13 52:20 64:11 77:14 86:10 99:22 106:21 110:23 112:19 (14)</p> <p>goes 27:4 55:15 101:23 120:13 (4)</p> <p>going 10:6,11 20:17 25:25 33:25 42:7,8 68:19 105:22 110:25 111:3 117:12,21 138:25 (14)</p> <p>good 5:2 11:6 18:25 21:24,25 26:7 33:20 34:19 41:1 43:3 46:11 50:13,17 57:24 60:25 65:4 68:25 72:14 74:18 81:10 85:18 89:8 105:10 117:8 136:12 (25)</p> <p>got 135:8</p>
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

158

<p>govern 87:4</p> <p>governing 39:9</p> <p>government 122:23</p> <p>governmental 95:17</p> <p>gowanus 31:11</p> <p>graffiti 133:10</p> <p>grand 2:14,17 26:6,12 33:10 36:15 37:2 (7)</p> <p>grant 32:10 98:19 106:5 108:16,17 (5)</p> <p>grateful 50:6 126:1</p> <p>great 15:8 35:9 36:19 47:13 50:8 73:12 82:3 93:24 118:1 128:14 129:17 (11)</p> <p>greatest 61:13</p> <p>greatly 92:7</p> <p>green 34:5,21</p> <p>grid 60:3</p> <p>ground 67:7</p> <p>group 4:8 106:19 114:3 115:13,20,25 116:12 125:19 128:19 (9)</p> <p>groupmanaged 135:24</p> <p>groups 85:2 93:11,23 114:14,15 126:25 127:2,5 128:15 129:8 130:7,13,15 137:20 (14)</p> <p>growing 100:21 109:12</p> <p>guaranteed 87:7,7 106:9</p> <p>guidance 63:4 66:20</p> <p>guideline 53:23</p>	<p>guidelines 53:7,11 98:22 103:2,3 104:11 135:13 (7)</p> <p>gutters 6:24</p> <p>guys 83:18 116:10</p> <p>half 19:12</p> <p>hall 20:17</p> <p>halted 76:6</p> <p>hand 27:24 73:24 135:1 138:21 140:20 (5)</p> <p>handle 73:15</p> <p>handled 79:23</p> <p>handles 51:4</p> <p>hands 133:11</p> <p>happen 22:16 42:13 60:13 90:12 111:1 (5)</p> <p>happening 42:5</p> <p>happens 22:15</p> <p>happy 91:7</p> <p>hard 22:2 34:10,22 69:14 81:23 92:5 131:13 137:21 (8)</p> <p>harder 115:3 126:4</p> <p>hardship 129:6 133:14</p> <p>hardworking 90:19</p> <p>harm 90:1 91:11</p> <p>harris 2:9 11:12,14,15 15:1 (5)</p> <p>has 10:5 16:1 19:21 28:2,21 32:6 37:4,6 38:22 39:21 40:7,8,8 48:7 49:16,16 54:5 55:13,18 58:24 59:12,15 63:1 66:12 73:12 74:22 76:4 79:16 80:16 83:6 84:4 92:10 95:7</p>	<p>98:1 99:3 105:25 108:4,11,23 110:14 114:1 116:1,21 117:2,13 121:20 128:13 132:16 133:3,20 135:10,21 (52)</p> <p>haul 62:2</p> <p>hauling 83:7</p> <p>haven 15:14</p> <p>haven't 135:7</p> <p>he 134:11</p> <p>he's 11:9,10 33:10 36:16 (4)</p> <p>hear 15:5 26:8 30:14,16,19,21 89:10 (7)</p> <p>heard 61:8 63:2 106:12 107:8 126:21 137:3,19 (7)</p> <p>hearing 7 5:9,11,14,20 8:17 9:4,8,16 50:21 51:15 62:10 138:25 (13)</p> <p>hearts 27:13</p> <p>heavily 15:17 57:3</p> <p>heavy 14:11 35:2</p> <p>heights 4:7 10:13,16 55:5 94:17 115:13,19,25 134:3,15 138:11 (11)</p> <p>hell 3:6,11</p> <p>hell's 65:2,7,9 72:13,18 125:20 (6)</p> <p>hello 29:10,11,12 30:21 43:3 54:23 67:22 91:24 105:8 128:12 132:2 (11)</p> <p>help 32:17,17 35:10 49:17 52:13,22 72:2 77:13 79:9 98:20 99:17 106:23 112:22 116:17 118:6 123:20 124:10,21 126:10 137:21 138:4 (21)</p>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services

February 10, 2025

159

<p>helped 57:6 73:3</p> <p>helpful 33:21 60:10</p> <p>helping 120:4 122:13 129:9</p> <p>helps 120:23</p> <p>her 30:19</p> <p>here 11:4 25:2 29:14,14 36:17 57:23 100:4 119:13 127:21 128:25 131:5,19 132:19 133:9 (14)</p> <p>here's 52:21,22</p> <p>hereby 140:9</p> <p>herein 120:17</p> <p>hereunto 140:19</p> <p>hi 26:7 29:19 33:12 36:21 50:17 57:23 74:18 77:22 81:9 94:9 100:3 107:25 112:4 115:15 125:17 (15)</p> <p>higher 97:21 102:3</p> <p>highly 30:2 37:20</p> <p>hill 55:5,5</p> <p>him 124:7</p> <p>his 124:9</p> <p>hold 71:2 108:6 109:3</p> <p>holding 50:21</p> <p>holiday 23:15</p> <p>holidays 55:24 122:18</p> <p>home 22:16 30:7 58:9 100:9,9 (5)</p> <p>homeless 17:5</p> <p>homelessness 49:14</p>	<p>homes 117:6</p> <p>hope 23:21 26:8 50:10 66:23 139:12 (5)</p> <p>horrendous 40:9</p> <p>horrified 119:22 125:8</p> <p>host 129:3 131:11</p> <p>hosted 112:14 131:20</p> <p>hosts 97:4</p> <p>hotel 123:4</p> <p>hour 97:5</p> <p>hours 18:8 63:14 128:24 137:10 (4)</p> <p>household 112:25</p> <p>households 6:11</p> <p>how 6:5 12:3 25:24 33:25 35:12 52:3,13,21,22 56:16 64:9 67:2 80:17 90:24 100:14,14 104:20 118:15,24 129:19 135:16,22 (22)</p> <p>however 20:4 22:13 33:24 37:19 51:10 73:13 78:24 86:5 89:22 95:6 102:12 112:20 (12)</p> <p>hs 74:22</p> <p>hub 15:12 74:25</p> <p>hudson 3:6,10,12 65:2,6,9 72:13,17 74:17,20 (10)</p> <p>huge 22:1 81:16 118:21,22 132:10 (5)</p> <p>humans 119:2</p> <p>hundreds 19:24,24 86:23</p> <p>hunt 11:1,7</p> <p>hurdle 39:4</p>	<p>hurt 114:9</p> <p>husband 125:2</p> <p>hydrants 104:6</p> <p>hyhk 66:9,21 72:19 73:8,10 (5)</p> <p>i'd 46:14 68:2 128:21 130:24 131:4 135:6 (6)</p> <p>i'll 119:7</p> <p>i'm 10:6 15:9 18:25 19:1 29:14,14,17,19 30:12,14 33:15 41:2,3 43:4,7 46:12 50:18 54:23,24 57:25 61:1,3 67:24 74:18 77:23 92:1 100:4 105:8,12 107:25 111:6 112:5 115:19 119:12,21,22 123:21,21,22 125:7 128:18 129:2,13 133:12 136:5 138:25 (46)</p> <p>i've 16:15 91:25 119:25 125:2 137:3 (5)</p> <p>idea 20:15 66:10 74:8 84:9 119:25 (5)</p> <p>identify 34:10</p> <p>identifying 71:11</p> <p>ignores 85:5</p> <p>illegal 16:1,8,11 17:6 38:7 68:9 78:18 103:18,23 106:16 110:17 113:17,23 (13)</p> <p>illegally 119:1</p> <p>immediately 121:16</p> <p>imminent 28:18</p> <p>impact 34:1 37:4 43:9 47:11 85:6 86:21 88:17 114:17 128:6 132:23 (10)</p> <p>impacted 97:12 126:24</p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

160

<p>impacts 90:18 113:24</p> <p>impede 49:22</p> <p>implement 20:24 27:25 35:18 39:2 51:14 52:9,14,19 53:3 54:7,12,15 71:25 79:14 80:20 83:3 (16)</p> <p>implementation 18:13 19:18 20:21 25:16 36:2 62:20 71:7 74:7 94:1 107:10 (10)</p> <p>implemented 75:22 81:1,3 122:3 126:6 (5)</p> <p>implementing 16:17 32:8 36:6 39:24 51:11 78:7 95:22 (7)</p> <p>implies 27:14</p> <p>implore 40:11</p> <p>importance 45:21 77:8 88:10 89:18 (4)</p> <p>important 33:18 52:20 54:8,17 65:25 74:12 77:8 (7)</p> <p>importantly 96:15</p> <p>impose 11:25 38:16 45:5</p> <p>imposed 86:18</p> <p>imposes 124:17</p> <p>imposing 84:13 87:14</p> <p>impossible 27:25 28:11 56:14 59:20 62:14 102:7 123:11 (7)</p> <p>improper 110:16</p> <p>improperly 41:22</p> <p>improve 25:12 45:1 65:16 95:19 112:11 (5)</p> <p>improvement 2:12,16 3:16,19,22 4:4 7:15 13:6 15:11 19:3 21:14,22 29:24 33:6,17</p>	<p>42:19 55:10 74:20 85:16 91:20 94:15 100:2 105:7 106:25 120:3,25 122:1 126:23 132:19 133:17 (30)</p> <p>inadequate 27:24 63:7 69:21</p> <p>inadequately 61:20</p> <p>inappropriate 76:19 122:12</p> <p>incarceration 49:14</p> <p>include 75:20 97:17 106:8 116:19 122:17 123:19 (6)</p> <p>included 90:15 114:5</p> <p>includes 61:22 87:9 126:25 127:15 (4)</p> <p>including 17:4 28:4 30:1 61:18 73:25 85:24 99:19 119:19 (8)</p> <p>incomplete 54:16</p> <p>inconsistent 39:22</p> <p>increase 8:11 35:13 96:16</p> <p>increased 97:20</p> <p>increases 102:19</p> <p>increasing 77:3 133:16</p> <p>incredibly 33:18</p> <p>independence 49:18</p> <p>independent 55:10 75:13 86:11 96:7 (4)</p> <p>indicate 46:7</p> <p>indicating 9:17,19 23:20 24:12 135:3 (5)</p> <p>indiscernible 109:25 110:6,12</p> <p>individual 24:3 75:15 80:15 98:5 (4)</p>	<p>individuals 2:8 3:2 4:2 78:18 87:18 (5)</p> <p>induce 91:6</p> <p>inefficiency 87:20</p> <p>infestation 105:16</p> <p>inflation 102:18</p> <p>inflexible 61:15</p> <p>informal 124:12</p> <p>information 130:22</p> <p>informed 103:6</p> <p>infrastructure 104:8</p> <p>initially 108:17</p> <p>initiative 4:6 47:10 79:12 95:13 112:3,6 119:18 121:5 (8)</p> <p>initiatives 8:10 39:25</p> <p>innovative 21:13</p> <p>inordinate 68:9</p> <p>input 17:19 70:2</p> <p>install 47:21 48:10 121:16</p> <p>installation 28:5</p> <p>installed 39:12 121:5</p> <p>instances 103:10</p> <p>instead 27:20 39:25 71:6 84:13 85:9 105:21 (6)</p> <p>instruct 24:15</p> <p>insufficient 54:6</p> <p>insulting 37:21 64:12</p> <p>insurance 102:18</p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

161

<p>intend 45:5</p> <p>intended 43:21 87:12</p> <p>intending 11:4</p> <p>intent 95:14</p> <p>interagency 69:22</p> <p>interest 90:16 102:21</p> <p>interested 5:25 140:18</p> <p>interface 130:15</p> <p>intersecting 70:3</p> <p>into 45:24 52:15 74:24 75:16 82:23 90:5 91:2 117:12 (8)</p> <p>introduce 64:19</p> <p>investigations 16:12</p> <p>investment 51:12</p> <p>investments 37:7</p> <p>involved 131:5</p> <p>involves 39:6</p> <p>involving 104:18</p> <p>ironically 73:6</p> <p>is 5:3,10,14 6:19 8:16,22 11:3,7,15 12:14,18 14:3,5,9 15:2,9 17:14,25 18:14,20 19:2 21:20 22:13,20,20,23 23:10,17 24:18,19 25:9 26:4,11 27:20 28:6 29:4 30:7 31:2 33:4,14,18,20,25 34:7 35:8 36:10,14,22 37:19,22,23 38:7,17,18,20 39:2 40:19 41:8 44:1 45:6,18,25 46:9,12 48:20 50:1,6,15,18 52:13 54:4,6,21 57:9,12,20 58:3,6,9,22 59:1 60:2,23 61:1 62:8,20 63:12 64:12,25 65:5,24 66:5,8 67:10,19,24 68:10,22 69:1,19,23,25 70:5,13 71:4</p>	<p>72:11,16 73:10 74:16,25 76:18,23,25 77:2,9,19,22 78:10 79:1,20 80:3,11,25 81:6,10,15,16 82:2,13,17 83:16 84:5,14,22 85:5,14,19 87:13 89:4 91:18,24 92:8,18 93:15,18,22 94:6,13 95:13 96:6 97:23 98:2 99:25 100:4,7,11 101:6,7,15,19,19 102:1,3,8 103:12,24 104:24,25 105:5 108:1 109:23 110:3,9,11,25 111:3,10,14 112:1,4,9 113:8 115:7,21 116:22,25 117:22,23 118:16,17,18,18,20,22 119:10 120:1,9,11 123:1,23,23 125:11,17 127:9 128:10,18 130:3 131:9,13,15,25 133:6,19 134:24 136:1,3 137:12 140:13 (218)</p> <p>island 61:4 132:21</p> <p>issue 38:20 76:19 132:6</p> <p>issued 39:8</p> <p>issues 13:5 17:4,8 28:7 56:19 67:6 70:12 82:18 86:9 88:24 96:1,25 104:16,18 105:17 110:21 (16)</p> <p>issuing 17:24</p> <p>iterative 74:5</p> <p>its 6:1 9:5 12:5 38:22 40:11 44:11 49:5 58:25 66:7 71:8 73:20 75:21 93:3,7 95:5 113:25 114:14 120:4 122:13 128:22 (20)</p> <p>itself 38:11 63:3</p> <p>jackson 4:7 115:13,19,25 (4)</p> <p>james 2:20 3:20 46:9 94:6,13 (5)</p> <p>jeffrey 3:9 68:22 69:1</p> <p>jeopardize 107:6</p>	<p>jerry 43:1</p> <p>jim 46:12</p> <p>job 11:19 27:16 49:15 64:14 85:4 93:20 120:4 122:14 131:17 132:11 (10)</p> <p>jobs 49:12 126:3</p> <p>join 105:13</p> <p>journey 49:18</p> <p>juggling 26:19</p> <p>julia 20 140:8</p> <p>july 66:25</p> <p>junkie 125:7</p> <p>jurisdiction 70:3</p> <p>just 16:25 20:6 22:1,9 23:1 27:23 30:17,20 40:19 41:6 46:5,14 77:24 105:23 109:1 111:21 114:18 116:7 125:15 132:5,20 133:7,15 135:25 137:9 138:2,6 (27)</p> <p>justice 114:3</p> <p>kalvis 3:15 85:14,19</p> <p>keep 13:18 27:17 33:22 34:22 64:13 72:2 75:25 85:25 90:22 106:23 114:11 116:4,18 120:23 124:2,21 126:11,18 138:4 (19)</p> <p>keeping 15:24 32:18,18 79:10 81:18,25 85:4 92:5 100:22 126:1 (10)</p> <p>key 64:4 69:16 75:23</p> <p>kindly 112:7</p> <p>kitchen 3:6,11 65:2,7,9 72:13,18 125:20 (8)</p> <p>know 24:11,12 41:15,20 42:3</p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

162

<p>46:20 60:2,10 93:1 105:15 111:16 117:5 119:4 128:25 (14)</p> <p>knowing 23:8</p> <p>known 15:12 72:19</p> <p>knows 40:20</p> <p>kudos 22:5</p> <p>kunz 3:12 74:16,18,19 (4)</p> <p>labor 45:11 109:7,11,16 135:18 (5)</p> <p>laborious 96:17</p> <p>lack 12:2 27:21 43:21 64:8 66:12 95:21 103:2,3 (8)</p> <p>lacks 69:22 87:22 96:20 114:6 (4)</p> <p>landlords 117:3,6 118:24</p> <p>lane 53:13,18 102:10 103:25 (4)</p> <p>lanes 32:4 53:13,14,15 (4)</p> <p>language 95:14 120:9 122:17 127:14 130:11 (5)</p> <p>large 24:7,13 83:5 87:25 96:22 98:14 114:4 116:11 117:1,12 123:21 129:24 133:1 (13)</p> <p>larger 62:2,23</p> <p>largest 58:7</p> <p>last 16:4 20:15 50:10 52:11 79:24 121:15 138:10 (7)</p> <p>lastly 80:16</p> <p>late 36:3</p> <p>later 67:1 126:16 135:9</p>	<p>latest 79:25</p> <p>laudable 19:15</p> <p>laudatory 36:8,9</p> <p>launched 39:20</p> <p>laura 3:5 60:23 61:1</p> <p>lauren 3:14 81:6,10</p> <p>law 66:7</p> <p>laws 65:13</p> <p>layla 2:22 54:21,23</p> <p>lc 4:8 115:14,21</p> <p>lead 19:17 21:13 54:11 59:18 80:25 87:20 115:4 (7)</p> <p>leader 108:25 127:15</p> <p>leaders 122:8 127:11</p> <p>leading 97:19</p> <p>learn 52:13</p> <p>learned 47:15 53:21 80:16</p> <p>learning 40:4</p> <p>least 25:11 130:21</p> <p>leave 90:13</p> <p>leaving 44:21 102:11</p> <p>led 60:5</p> <p>lefrancois 3:9 68:22,25 69:1 (4)</p> <p>left 63:15 87:15 95:7 101:3 103:8 122:6 127:18,23 130:18 (9)</p> <p>legion 4:10 125:12,18 126:9 127:1 (5)</p>	<p>legislation 95:15</p> <p>legislative 96:17</p> <p>legislatively 75:17</p> <p>lend 41:6</p> <p>lengthy 86:16 87:3</p> <p>less 50:5 54:4 110:8 111:12 136:24 (5)</p> <p>let 22:1 35:24 105:11,19 (4)</p> <p>let's 57:14 110:23</p> <p>lettera 22:7 124:7</p> <p>level 24:21 38:15 59:14 119:24 (4)</p> <p>levels 32:13</p> <p>lids 7:13 127:7</p> <p>lies 120:17</p> <p>life 16:9 17:4 37:5 83:2 84:2,11 95:19 97:22 (8)</p> <p>lifeline 49:17</p> <p>lift 110:7</p> <p>lights 23:15 55:24</p> <p>liguori 2:3 5:2,3 10:11,15,18,24 11:1,7,11 14:25 15:7 18:18 21:18 26:3 29:3,8,11,13,15,18 30:18,22 33:3 36:13,19 40:17 42:24 46:4 50:14 54:20 57:19 60:22 64:24 67:18 68:14,17,19 72:10 74:15 77:18 81:5 85:13 89:3 91:17 94:5 99:24 105:4 107:21 110:12 111:25 115:11 119:9 125:10,14 128:9 131:23 134:1,5,9,14,17,20,24 135:4 138:9,13,16,20,24 (70)</p> <p>like 20:16 23:1,19,19 30:4 34:14 36:7 38:6 45:8</p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

163

<p>46:6,14,17 47:5 68:2 77:24 79:13 81:17 93:5,11,19,23 105:22 113:10 114:10,15 119:25 122:19 126:25 128:21 130:24 131:4,10,17 133:18 135:6 139:5,6 (37)</p> <p>likely 36:4 39:2 79:3</p> <p>likes 74:8</p> <p>limit 9:25 63:14 96:24</p> <p>limitations 88:14 110:16</p> <p>limited 55:19 80:8 91:12 103:25 104:18 (5)</p> <p>lincoln 4:9 119:11,14</p> <p>line 56:7 101:16 120:15</p> <p>liners 92:22 101:1</p> <p>lines 136:13</p> <p>list 10:20 46:8 70:15 75:21 (4)</p> <p>listed 40:22</p> <p>listen 26:9</p> <p>literally 23:19</p> <p>litter 4:10 6:25 7:4,23 27:5 34:23 44:25 50:24 51:6,19 82:10 89:19 97:20 108:6 109:20,24 110:3,10 111:5 113:1,5,12 115:7 116:12 119:5 125:12,18 126:8,9,13,15,20 127:1,8,18 129:12 130:19 137:21 (38)</p> <p>little 31:22 55:25 66:19 80:20 97:9 123:12 (6)</p> <p>livable 8:13</p> <p>live 26:24 57:7</p> <p>living 25:1 28:15 71:24</p> <p>lmi 26:13</p>	<p>loading 137:4</p> <p>local 7:1 62:16,17 92:9 93:4 98:11 114:11 116:9 (8)</p> <p>localelected 5:23 89:17</p> <p>located 39:16</p> <p>location 7:5,24 60:8 66:22 67:4 73:18,21,23 127:23 129:23 (10)</p> <p>locations 14:12 31:5 32:9 35:15 39:11,13,17 44:16 52:5 59:24 60:12 71:12 80:9,17,22 109:3 121:20 123:11,12 (19)</p> <p>logistically 56:14</p> <p>long 49:24 51:18 58:24 61:4 95:3 132:21 (6)</p> <p>longer 81:3 91:15</p> <p>longstanding 38:8 50:7 99:8</p> <p>longterm 91:9</p> <p>look 18:10 21:10 41:24 88:24 90:7 93:24 107:17 (7)</p> <p>looked 135:16</p> <p>looking 85:1</p> <p>looks 72:4 133:12</p> <p>loose 126:13</p> <p>lose 49:11 60:6</p> <p>losers 41:16</p> <p>loss 123:25</p> <p>lot 80:16 106:12 111:13 116:8,15,17 117:3,20 118:5 122:7 132:16 136:10,23 (13)</p> <p>lots 118:14 123:8</p> <p>love 84:14 116:7,9 118:23 (4)</p>	<p>lower 53:3 60:2 69:8 109:15 111:9 (5)</p> <p>lpc 91:8</p> <p>lure 76:2</p> <p>m 20 140:8</p> <p>mack 4:5 107:22,25,25 110:13 (5)</p> <p>made 16:13 32:7 37:6 60:6 68:3 84:25 105:21 135:18 (8)</p> <p>madelynn 2:3 5:3 21:25 128:24 131:21 138:2 (6)</p> <p>madison 2:18 40:25 41:3</p> <p>magic 22:15,15,17,19 (4)</p> <p>mailed 5:22</p> <p>maintain 56:11 98:21 108:14 127:6 (4)</p> <p>maintained 117:18</p> <p>maintaining 69:5 88:11 99:9 106:7,10 115:2 (6)</p> <p>maintains 114:19</p> <p>maintenance 28:5 83:13 96:13</p> <p>major 20:6 56:19 77:4 93:6 104:16 120:17 (6)</p> <p>majority 13:13 34:14 90:10</p> <p>make 9:2 22:14 23:15 25:5,25 32:25 35:17 41:24 42:20 50:1 52:25 57:7 59:19 66:13 80:12,21 82:21 90:21 93:7,22,23 94:2 105:23 113:17 117:14 136:11 137:24,24 (28)</p> <p>makes 13:3</p> <p>making 14:22 45:23 71:24 80:5 92:16 102:6 103:13</p>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

164

<p>104:1,1 111:12 113:14 118:25 133:11 (13)</p> <p>mall 30:3</p> <p>maltezos 3:6 64:25 65:4,5 (4)</p> <p>manage 31:4 58:25 74:25 78:15 114:13 (5)</p> <p>managed 104:24 106:14</p> <p>management 3:9 68:24 69:3 70:19 106:3 114:8 125:4 (7)</p> <p>manager 3:3 57:21 58:1</p> <p>manages 29:24 102:4</p> <p>managing 58:22 101:21</p> <p>mandate 11:24 13:5 20:17 22:10,13 23:10 24:18 28:18 56:13 62:9 94:23 95:6,23 96:10 99:4,15 102:7 103:1 124:18 (19)</p> <p>mandates 14:17,21 36:7</p> <p>mandatory 108:2</p> <p>manhattan 19:2 43:6 60:2 78:15 92:14 125:21 129:5 (7)</p> <p>manhattan's 69:8 74:23</p> <p>manner 21:8 54:3</p> <p>manual 6:22</p> <p>manufacturing 20:8</p> <p>many 10:2 36:7 52:3 61:7 62:14,21 63:24 72:21 81:16 86:16 93:10 104:4,5 110:14,15,15 126:21 129:7,19 132:9 136:14 137:7,8 (23)</p> <p>mapping 44:16 51:23</p> <p>marginally 28:14</p> <p>mario 10:21,24 134:5,17</p>	<p>138:13 (5)</p> <p>mark 2:21 50:15,18</p> <p>marketing 82:25</p> <p>marriage 140:17</p> <p>married 125:3</p> <p>marta 4:7 115:12</p> <p>martin 2:20 46:10,11,12 (4)</p> <p>materials 7:11 39:10 51:14</p> <p>matter 91:14 107:13 140:12,18 (4)</p> <p>matthew 2:18 40:19,24 41:2 (4)</p> <p>maxedout 26:20</p> <p>may 6:5 7:2 8:17,24 9:17 20:15 24:21 42:11,13 44:11 46:7 49:5 53:22 56:5 64:2 73:6,18 94:19 97:13 113:4 123:24 129:24 130:22 136:21 138:21 139:7,9 (27)</p> <p>maybe 30:19,19 137:3</p> <p>mayor's 18:12</p> <p>mccall 2:15 29:8 33:4,12,15 (5)</p> <p>me 15:6 17:1 22:1 24:5,6,7 26:8 30:11,14,21 72:20,24 92:4 105:11,19 108:24,24 119:25 132:3 (19)</p> <p>mean 7:15 24:1,4,11,12 55:23 83:17 122:7 136:17 (9)</p> <p>meaning 49:10</p> <p>means 10:4 26:18 79:7</p> <p>meantime 32:6</p> <p>meanwhile 28:1</p>	<p>measures 64:19</p> <p>meatpacking 3:9 68:23 69:2 71:4 72:4 (5)</p> <p>mechanism 35:9</p> <p>mechanisms 25:15 106:5</p> <p>media 5:24</p> <p>medium 53:1 123:22</p> <p>mediumsized 62:5</p> <p>meet 12:22 19:7 106:20 133:14 (4)</p> <p>meeting 52:12 53:21 131:3</p> <p>meetings 45:3 74:6 131:11</p> <p>melrose 15:13</p> <p>member 3:17 16:6 89:5,15 105:12 107:1 (6)</p> <p>members 6:3 68:3 82:20</p> <p>men 11:18 41:10 46:15 49:10,13 50:3 125:24 (7)</p> <p>mention 63:8</p> <p>mentioned 73:16 83:6 84:5 105:25 132:6,25 (6)</p> <p>merchant 90:20</p> <p>merchants 7:16 34:24 118:2</p> <p>merit 40:7</p> <p>met 16:15 108:24</p> <p>metrostor 16:16 35:11 83:25 136:20 (4)</p> <p>meyer 29:5,20</p> <p>microsoft 14 131:13,14 132:6 (4)</p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

165

<p>middle 17:17 20:12,19</p> <p>midtown 2:11 18:21 19:2 43:6 65:8 (5)</p> <p>miflin 4:13 135:3,4,6 (4)</p> <p>might 21:3 30:19 52:5 60:11 97:17 (5)</p> <p>migration 114:5</p> <p>mikelsteins 3:15 85:15,18,20 (4)</p> <p>miles 81:15</p> <p>million 13:16 19:9,11,13 45:10 46:25 48:12,19 58:10,14 (10)</p> <p>minimal 13:15</p> <p>minimize 86:19 88:6</p> <p>minimizes 96:4</p> <p>minimum 20:25 83:17 102:19 106:9 (4)</p> <p>minutes 10:1 68:21</p> <p>misguided 113:8</p> <p>missed 122:17</p> <p>missing 110:10 132:4</p> <p>mission 56:8 100:19</p> <p>missions 121:2</p> <p>mistake 50:1</p> <p>mistakenly 66:4</p> <p>misunderstanding 113:9</p> <p>mitigated 89:21</p> <p>mitigation 43:15</p> <p>model 95:10</p>	<p>moderate 130:2</p> <p>modified 98:4</p> <p>modules 109:2 121:18</p> <p>momandpops 26:22</p> <p>moment 23:17</p> <p>monetary 11:25 13:8 66:18</p> <p>money 22:22 23:6 35:7,21,23 74:10 82:14 85:3 117:8 118:25 129:3 (11)</p> <p>monica 4:9 119:10</p> <p>monitor 108:20 109:18</p> <p>months 20:7 54:4,6 67:1,4 73:17 (6)</p> <p>more 8:13,13 13:22 14:6 16:2,13 19:9 25:5,11 39:22 50:4,10 53:4,8 63:20 65:23 68:13 77:5,5 79:4,15 80:14 81:14 90:13,14 92:17 93:8 95:11 99:13 100:15 101:25 104:21 115:4,7 121:19 129:14 131:11,18 133:21 134:14 136:3,17 (42)</p> <p>moreover 87:2</p> <p>morning 5:2,9 9:11 11:6 18:25 21:24,25 26:7 41:1 43:4 46:11 50:17 57:24 60:25 65:4 69:1 72:14 74:18 81:10 85:19 89:8,13 94:10 105:10 106:13 116:6 (26)</p> <p>morris 2:12 21:22 22:3</p> <p>most 15:16 20:9,22 26:15 30:2 36:3 39:4 49:1 62:5 65:24 114:10 127:23 (12)</p> <p>mott 15:14</p> <p>move 10:11 35:14 67:16 68:20 77:13 87:5 111:19 123:12 (8)</p>	<p>moved 20:22 62:24</p> <p>moves 31:17</p> <p>moving 62:4,8 111:4</p> <p>ms 5:2 10:11,15,18,24 11:1,7,11 14:25 15:7 18:18 21:18,24 26:3,7 29:3,8,10,11,1 2,13,14,15,15,17,18,19 30:12,18,21,22,24 33:3 36:13,19 40:17 42:24 43:3 46:4 50:14 54:20,23 57:19 60:22,25 64:24 65:4 67:18 68:14,17,19 72:10 74:15 77:18,22 81:5,9 85:13 89:3,7 91:17 94:5 99:24 105:4,8 107:21,25 110:12,13 111:25 115:11,15 119:9,12 125:10,14,15 128:9,12 131:23 134:1,5,9,14,17,20,24 135:3,4,6 138:9,13,16,20,24 (95)</p> <p>mta 122:25 123:3</p> <p>much 11:11,14 14:25 18:18 21:16,18 23:20 26:3,9 29:2,3 31:14 33:3 36:13 42:23 46:4 50:14 54:20 60:22 64:24 65:23 68:13 72:10 77:18 81:5 84:25 85:12 89:3,7,9 91:17 94:5 99:24 105:4 107:17,21 111:8,25 115:3,16 116:3 119:6,9,12 128:9 131:23 133:25 134:1 135:7 138:1,9 (51)</p> <p>multiple 75:18 83:23 129:21</p> <p>municipal 37:1,23 44:1</p> <p>must 13:7 31:16 70:11 77:15 97:7 115:9 122:16 123:9 (8)</p> <p>mute 6:7</p> <p>my 5:3 11:15 15:9 16:5 21:15 26:11 28:23 33:14 46:11 50:17 60:21,25 65:4 67:24 69:1 72:16 73:16 77:22 78:1 79:15 80:11,16 85:19 91:24 94:13,19,20 100:3 110:11</p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

166

<p>112:4 119:7 123:23 125:2,17 128:18 129:2,6 135:8 140:14,20 (40)</p> <p>myer 2:15 29:10,12,14,16,17,19 30:12,21,24 (10)</p> <p>n 2:2</p> <p>name 5:3 9:19,21 11:15 15:9 26:11 33:14 46:11 50:18 61:1 65:5 67:24 69:1 72:16 77:22 85:19 91:24 94:13 100:4 112:4 125:17 128:18 (22)</p> <p>narrow 60:3</p> <p>nassau 140:6</p> <p>nate 4:6 112:1,2,4 115:16 116:3,22 (7)</p> <p>nation 21:12</p> <p>nature 119:23</p> <p>navigable 6:14</p> <p>near 14:8 113:13</p> <p>nearly 27:3 28:3,15 58:9,12,22 59:20 94:25 (8)</p> <p>neaten 41:24</p> <p>neatly 22:17 118:8,9</p> <p>necessary 70:9 104:11 114:20 122:2 (4)</p> <p>need 13:11 16:10 20:1,11 23:23 24:5 27:14 35:17 48:9 52:17 53:8,25 56:6,24 64:16 68:12 73:18 80:13 83:11 84:16 87:6 104:12 107:5 109:12 111:19 117:14 121:19 137:10,15 (29)</p> <p>needed 52:4,8 62:25 81:21 84:7 (5)</p> <p>needn't 137:5</p>	<p>needs 12:5,9 18:14 19:7 25:10 40:13 53:4 67:8 72:6 90:6 107:20 113:7 137:14 (13)</p> <p>negative 85:6 90:18</p> <p>negatively 43:9</p> <p>neighborhood 7:16 14:23 30:7 31:21 43:24 45:2,15 69:17 75:24 76:3 82:22 84:12 90:20 92:14,17 108:16 112:12 114:4,6 116:2,16 117:22 118:14 123:23 125:20 (25)</p> <p>neighborhoods 8:14 15:13 32:25 40:14 55:4 65:19 66:3 93:1 95:3 100:22 106:23 114:16 129:9 (13)</p> <p>neighbors 26:22</p> <p>neither 34:9</p> <p>never 78:20 109:21</p> <p>neverending 27:4</p> <p>new 3 5:22 6:9 7:6 8:8,14 21:5,12 25:6 38:3 41:4 43:15 46:13 49:6 57:7,11,16 59:24 60:7,11 64:7,22 66:7 69:5,20 71:22 77:3 83:11 86:17 89:1 92:5,7,23,25 93:5,7,10 94:2,24 95:19 99:14 100:17 102:7,17 104:23 111:18 113:21 114:2 126:5 128:17 129:2 140:4,9 (53)</p> <p>news 103:16</p> <p>next 9:6 12:13 15:2 17:18 18:20 21:20 26:4 29:4 33:4 36:14 40:19,21,21 42:25 46:9 47:6 50:15 51:19 54:21 57:20 60:23 64:25 67:19 68:20,22 72:11 74:16 77:19 81:6 85:14 89:4 91:18 94:6 99:25 105:5 107:22 112:1 115:12 119:10 125:11 128:10 129:12 131:25 134:2 (44)</p> <p>nicely 64:2</p>	<p>nine 136:8</p> <p>no 10:10,14,17,23,25 11:9 19:20 20:15 22:17 25:5 29:7 31:23 35:9,12 42:2,14 50:1 52:25 53:15,18 55:24,24 63:4,24 66:18 68:16,18 74:9 78:13 84:24 124:13 125:13 134:4,8,13,16,19,23 138:12,15,19,23 140:17 (43)</p> <p>noah 4:12 10:7,9 131:25 (4)</p> <p>nobody 22:11</p> <p>noho 3:13 77:21,24 78:2,4 (5)</p> <p>nonbid 43:19</p> <p>noncompliance 87:12</p> <p>none 138:24</p> <p>nongovernmental 7:17</p> <p>nonprofit 47:16 48:9 75:13 76:16 90:6 92:9 120:21 124:19 128:22 135:10 (10)</p> <p>nonprofits 55:11 86:11 90:11,19 91:11 96:7 127:22 (7)</p> <p>nonstandard 44:12</p> <p>nor 59:23 88:14</p> <p>normal 14:7 18:8</p> <p>north 3:20 34:3 75:2 94:7,14 97:3 99:3 134:6,18 138:14 (10)</p> <p>northshore 10:22</p> <p>notary 140:8</p> <p>note 80:10 83:22</p> <p>noted 18:25 139:13</p> <p>notforprofit 116:1,19</p> <p>nothing 22:15 27:11</p>
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

167

<p>notice 9:14</p> <p>notification 79:23 80:1,5</p> <p>notify 129:18</p> <p>notion 113:7</p> <p>november 51:16 59:7</p> <p>now 20:9 23:8 62:8 79:2 85:1 101:20 116:2 121:17 122:19 131:3 136:21 (11)</p> <p>nowhere 113:20</p> <p>number 35:13 61:11 102:15 103:20 114:19 122:5 136:5 (7)</p> <p>numerous 101:7</p> <p>nyc 3:5 60:24 61:2,17 65:10 86:14 87:4 139:9 (8)</p> <p>nycrules@dsnynycgov 8:25 139:8</p> <p>nypd 17:9 72:22</p> <p>object 44:19</p> <p>objecting 71:5</p> <p>objects 44:15</p> <p>obligation 100:18</p> <p>obstruct 39:14</p> <p>occupy 32:3</p> <p>off 51:8 54:14 61:11 62:12 64:16 73:8 75:6 79:11 81:19 105:9 112:17 121:12 134:11 (13)</p> <p>offense 76:15</p> <p>offer 88:14</p> <p>office 3:17 18:12 76:2 77:4 89:5 131:17 (6)</p>	<p>official 89:17</p> <p>officials 5:23 82:19</p> <p>often 13:14 14:5 16:24 17:3 35:4 56:25 66:3 125:23 130:1 132:13 (10)</p> <p>oh 29:15,15 110:11</p> <p>oldest 15:16</p> <p>omb 119:25</p> <p>once 25:22 110:8</p> <p>one 13:16 14:5 15:16 16:22 23:10 25:11 33:21 34:8 41:16 46:24 47:16 60:6 66:22,25 67:4 73:17,21,23 76:15 78:14 94:24 100:25 104:3 118:16 119:19 123:12 127:15 130:9 133:5,5,8,14 134:14 136:7 (34)</p> <p>oneandahalf 81:14</p> <p>ones 137:9</p> <p>onesize 38:21</p> <p>ongoing 83:13</p> <p>only 16:12 17:21 20:5,16 28:1 34:7 56:19 60:17 88:1 96:23 102:12 103:17 106:13 110:5 123:13 126:12 132:23 (17)</p> <p>onstreet 70:17 83:6 96:23</p> <p>onto 10:12</p> <p>open 55:24</p> <p>opening 125:6</p> <p>operate 59:9 114:16</p> <p>operated 104:21</p> <p>operates 31:3</p> <p>operating 13:15 18:8 108:8</p>	<p>operation 52:2 92:10 99:5</p> <p>operational 6:4 25:15 52:7 59:19 60:14 70:6 75:10 76:11 95:24 96:19 98:25 99:6 102:17 (13)</p> <p>operationalize 62:21 64:10</p> <p>operationally 64:18</p> <p>operations 3:3,10,15 17:8 37:7 50:19 57:21 58:1 62:13 66:15 69:22 72:12,17 85:16 132:12 (15)</p> <p>opportunism 43:20</p> <p>opportunity 19:4 21:17 29:22 33:13 46:2 85:21 94:11 132:3 (8)</p> <p>oppose 61:14</p> <p>opposed 35:16 108:2</p> <p>opposition 47:3 128:16</p> <p>opt 44:11</p> <p>optimally 25:9</p> <p>optimistic 25:7</p> <p>optimizing 32:14</p> <p>option 28:2 111:5</p> <p>options 47:20 52:1 83:5,9 106:2 137:2 (6)</p> <p>oral 8:18</p> <p>order 9:12 48:8 104:13,13 127:8 (5)</p> <p>organization 7:18 15:20 28:19 36:23 50:2 56:5,9,15 86:7 94:16 95:1 97:15 112:9 127:14 (14)</p> <p>organization's 16:3</p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

168

<p>organizations 18:9 21:2 57:4 64:17,21 75:14 93:5,19 98:6 106:22 113:4,10,18 116:20 120:21 124:19,25 127:21 128:7 (19)</p> <p>organize 65:22 112:18 113:18 126:10,17 (5)</p> <p>organized 112:13</p> <p>organizing 128:14</p> <p>original 95:15</p> <p>ostensibly 113:2</p> <p>other 6:14 7:5,17,23,24 12:15 14:5 16:9 20:3 21:2 23:13 28:1,16 35:15,19 39:5,16 55:23 67:9 68:4 71:2 73:3,24 74:3 83:7 86:8 87:1 88:20 90:24 102:2,19 104:8 105:17 117:21 118:14 120:3,16 127:1,4 129:7 130:6 135:23 137:8,17 (44)</p> <p>others 6:21 72:23 132:10</p> <p>otherwise 21:3 28:8 44:9</p> <p>our 11:17 13:1,2 14:2,8,12,13 15:17,19,20 16:2,19,21 17:17,18 18:7 19:6,8,12 20:2,14,14 22:6,12 23:1,6,16,18 24:15 25:20 26:21,22 27:11,11,13,15,18 28:3,13,16,19,19,20,24,25 31:2 32:14,18 33:22 34:7,11,13,15,17,18,22,24 35:1,2,8,13,19 36:14 37:5,22 39:7,12,15 40:13 41:6,19,23 42:20 43:10,14 44:2 45:1,23 46:15 47:2,9,13,20 48:22 49:11 50:2,6,13 51:5 52:1 53:17 55:17,20,23 56:1,1,5,7,9,9,14 57:3,13 58:21,21 59:9,16 62:12 65:10,11,16,18,25 66:3 68:10 69:9 71:23,24 72:2,7 75:9,19,19,25 76:5,12,24 77:11,15 78:8,17,25 79:5 80:18 81:22,25</p>	<p>82:7,13,16,20,23,25 83:18 84:12,20,20 85:4,6,22 86:4,7,10 89:10 90:2,4,10,22 92:8,10,16,18 93:12 94:22 95:2 96:8,9,13,16 97:1,14 98:6 99:20 100:11,18,21 101:16 102:12 103:15 107:7 108:7,10 110:4,25 111:3,7,18 112:12 114:16,22 115:17,20,21 116:1,4,9,11,13,14,16,17,24 117:1,13 118:3,13,19,19 119:21 120:5,6,12 121:1,9,9,13 123:24 124:2,3,3,14,24 126:1,11,18 127:13 128:6,14 133:7,16 136:2 138:4 (231)</p> <p>ours 93:23 114:10,15</p> <p>ourselves 23:10 65:14 80:2 95:4 (4)</p> <p>out 7:11,21 8:5 22:8 30:11,13 34:15 40:8 54:10 56:7 63:15 68:4,10,15 74:3 79:23 84:9 90:13 109:4 115:16 116:12,18,21 118:6,9,23 119:18 123:7 124:11 130:1,21 132:9,14 133:21 134:24 136:18 137:13,17 (38)</p> <p>outcome 140:18</p> <p>outlaw 112:21</p> <p>outlined 86:12 96:9</p> <p>outrageous 38:19 127:10</p> <p>outset 61:9</p> <p>outside 18:5,7 103:14</p> <p>over 15:15,15 16:20 35:7 36:24 46:22 48:12 50:9 51:4 55:2 56:8 58:11,13,18,18 59:22 61:16,25 65:11 69:10,14 76:9 78:5 80:8,20 81:3,18 83:12 100:9 105:22 108:7 109:2 111:16 112:15,16 116:2 123:2 126:19 133:7 (39)</p> <p>overall 15:19 19:19 79:10</p>	<p>overburdening 106:22</p> <p>overcome 39:5 49:13</p> <p>overflowing 118:7</p> <p>overflow 41:23 79:9 118:11</p> <p>overflowing 38:4 42:8 61:23 64:4 93:16 97:20 126:14,16 (8)</p> <p>overpopulation 89:20</p> <p>overseen 74:22</p> <p>oversimplifying 24:20</p> <p>overwhelming 93:14</p> <p>own 22:16 27:7,15 38:22 44:11 81:18 93:3 114:14 129:3 (9)</p> <p>owned 6:16</p> <p>owners 22:25 41:18 44:7 79:24 80:7 124:4 (6)</p> <p>p 2:2,2</p> <p>packedin 117:4</p> <p>paid 82:6</p> <p>paloma 2:15 29:9 33:5,12,15 (5)</p> <p>pandemic 75:25</p> <p>parades 122:18</p> <p>paralyzed 23:8</p> <p>paramount 30:5</p> <p>park 2:12 3:7 21:22 22:3 67:20,25 68:6 94:16 123:4 134:10,21 138:17 (12)</p> <p>parking 32:4 53:15,16,18 123:14 (5)</p> <p>parks 72:23 75:1</p>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

169

<p>part 47:9 65:25 72:5 81:20 82:4 95:18 99:11 100:18 118:18 (9)</p> <p>participate 70:24</p> <p>participated 75:7</p> <p>particular 116:24</p> <p>particularly 15:23 64:12 76:24 97:24 102:9 126:2,7 (7)</p> <p>parties 5:25 140:16</p> <p>partner 72:21 95:4 99:9 109:17 (4)</p> <p>partnered 38:12</p> <p>partners 14:14 32:24 40:15 46:20 48:22 57:6 61:17 62:11 64:13 65:11,15 67:16 70:7 72:2 76:20 81:17 85:10 90:24 120:3 122:2 (20)</p> <p>partnership 2:11,15,17 14:13,20 18:22 19:2 25:24 29:6,21,23 32:6 33:10 36:16 37:3 38:9 42:19 43:22 49:16,25 50:7 51:9 52:18 53:25 59:6 60:19 64:6 66:9 73:6 95:8,12 119:16 120:22 (33)</p> <p>partnerships 100:16</p> <p>parts 74:1 78:8 114:4</p> <p>parttime 92:19</p> <p>passed 48:22</p> <p>passing 45:18</p> <p>passman 2:22 54:21,23,24 (4)</p> <p>past 78:6</p> <p>path 107:4</p> <p>pathway 99:6</p>	<p>patricia 3:6 64:25 65:5</p> <p>pay 35:4 36:9 44:8,13 111:7 (5)</p> <p>paying 111:8</p> <p>pdc 91:9</p> <p>pedestrian 23:5 77:2 79:8</p> <p>pedestrians 136:11</p> <p>pedro 2:10 15:2,9</p> <p>penalize 57:8</p> <p>penalized 32:20</p> <p>penalizes 124:18</p> <p>penalizing 39:25 40:9 70:13 85:2 (4)</p> <p>penalties 8:2 13:8 38:16 44:14 76:13 87:21 98:8 129:11 (8)</p> <p>penalty 40:15 57:1 77:10</p> <p>people 10:2,19 18:15 22:3 71:22 83:7 111:8 115:17 131:2,19 138:4 (11)</p> <p>per 51:5 78:23 102:5 120:5 (4)</p> <p>percent 14:1,4,5 15:19 16:20 69:15 79:4 82:13,16 101:25 108:10 120:12 123:22 (13)</p> <p>percentage 102:3</p> <p>perform 6:21 31:16</p> <p>performed 100:19</p> <p>performs 6:20</p> <p>perhaps 133:19</p> <p>peril 55:9</p>	<p>period 10:5 20:9 81:3</p> <p>periods 70:18 88:4 98:17</p> <p>permanent 17:10 47:21</p> <p>permissible 39:11</p> <p>permitting 70:8</p> <p>persen 3:13 77:20,22,23 (4)</p> <p>person 10:7 15:2 18:20 46:9 60:23 (5)</p> <p>personalized 133:22</p> <p>persons 9:14</p> <p>perspective 132:24</p> <p>phase 74:6</p> <p>phenomenal 132:11</p> <p>physical 65:17</p> <p>pick 13:6 123:5 129:22</p> <p>pickup 37:10 38:1 42:4 59:13 62:7 63:15 84:15 88:6 93:6 109:15 110:25 116:10 124:13 (13)</p> <p>pickups 122:18</p> <p>pier 6:13</p> <p>pile 114:17</p> <p>piled 123:1</p> <p>piles 121:11 123:3</p> <p>pilot 59:4 66:22 71:10 74:6,9 79:22 82:5 108:18 121:4 137:15 (10)</p> <p>pilot's 108:20</p> <p>pioneered 12:24 13:9</p> <p>pitkin 4:5 107:23 108:4,11</p>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

170

<p>110:9 (5)</p> <p>pits 104:6</p> <p>place 6:13 7:2 19:22 24:15,16,25 26:24 44:23 50:24 56:22 57:7 93:8 103:11 113:4 117:22 121:1 124:12 129:15 (18)</p> <p>placed 7:11 8:5 59:23 127:20 (4)</p> <p>placement 6:11 80:10 88:5 97:1 98:23 104:1 112:25 122:20 (8)</p> <p>places 70:5 113:13 117:16,21 123:3 (5)</p> <p>placing 7:20 47:5 51:18 80:21 (4)</p> <p>plan 17:18 37:14 54:7,12 67:6 75:17,19 120:5 121:24 138:6 (10)</p> <p>planned 129:25</p> <p>planning 3:3,6,15 22:20 50:19 57:21 65:1,5 74:5 85:15 93:18 (11)</p> <p>plans 35:19 86:13 96:9 101:14 (4)</p> <p>plant 65:21</p> <p>plants 115:23</p> <p>plastic 22:11 25:6,21</p> <p>plates 16:13</p> <p>platform 131:12</p> <p>plazas 6:23</p> <p>please 6:7 9:20 25:11 28:22 45:6 54:10 (6)</p> <p>pleased 105:12 119:13 121:13 124:4 (4)</p>	<p>ploy 43:20</p> <p>plus 69:6 82:15 83:12 109:12 (4)</p> <p>pm 9:1 139:13</p> <p>point 24:15 34:5,21 60:6 66:17 68:4 132:9 135:2 (8)</p> <p>points 108:24</p> <p>police 123:6,14</p> <p>policies 89:12 91:4 106:11</p> <p>policy 13:4 26:17 28:10 40:8 47:3,9,15 48:8 49:5 50:1 70:8,21 71:25 75:6 100:12 101:6 132:23 (17)</p> <p>policymaking 95:24</p> <p>pollutants 114:22 115:5</p> <p>poorly 24:19</p> <p>popular 30:4</p> <p>populations 57:13</p> <p>port 10:21 134:6,18 138:14 (4)</p> <p>position 100:11</p> <p>positive 23:4 59:1 69:16,19 (4)</p> <p>possibility 63:24</p> <p>possible 23:20 25:5 60:11 81:2 83:4 90:21 (6)</p> <p>possibly 85:1</p> <p>post 139:10</p> <p>potential 45:7 52:5 53:20 98:7 (4)</p> <p>potentially 42:9 86:25 133:1,16 (4)</p>	<p>pounds 112:17 126:19</p> <p>power 14:16 19:21</p> <p>powerful 26:15</p> <p>practical 99:20 106:20</p> <p>practicality 88:17</p> <p>practically 132:20</p> <p>practice 51:18 127:17</p> <p>predominantly 27:12</p> <p>prejudicial 43:16</p> <p>premier 69:5</p> <p>prepares 36:25 37:25</p> <p>preparing 51:17</p> <p>present 8:16,18 131:19</p> <p>presented 28:23</p> <p>presently 28:10</p> <p>president 2:11,18 3:10 4:9 11:15 18:21 19:1,20 29:20 33:9 36:15 40:24 41:2 43:4 50:19 72:12,17 74:19 119:11 (19)</p> <p>presidentceo 2:17</p> <p>presidents 122:19</p> <p>pressure 54:14</p> <p>pressures 26:15,21</p> <p>pretends 27:19</p> <p>prevent 34:24 79:9 115:7</p> <p>preventing 38:3</p> <p>previous 68:3</p> <p>pride 50:8</p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

171

<p>prided 95:3</p> <p>primarily 107:7</p> <p>primary 83:24 101:20 117:22</p> <p>principle 22:11 78:5</p> <p>printing 74:24</p> <p>priorities 26:19</p> <p>private 12:16 37:17,23 38:2 39:17 51:2 58:11 120:20,22 124:19 (10)</p> <p>privately 6:15 38:2 44:8</p> <p>privatelyfunded 22:24</p> <p>probably 36:4</p> <p>problem 79:20 81:16 90:4 99:11 107:19 118:13,22 (7)</p> <p>problematic 36:10 37:20</p> <p>problems 27:12 60:15</p> <p>procedure 5:13 23:24</p> <p>proceedings 5:1 140:11,13</p> <p>process 20:11 23:24 38:22 54:1 60:10 65:12 66:12 70:25 72:5 74:5 86:16 96:18 97:9 108:21 (14)</p> <p>procure 71:15</p> <p>procurement 28:8 70:20,21</p> <p>productive 52:11</p> <p>products 70:16 71:13</p> <p>profoundly 95:7</p> <p>program 20:25 21:7,10 28:16 39:21 49:8 53:12 59:20 65:25 66:18,23 70:4,13,25 71:17 74:9,13 75:8 76:4 79:14,20 80:3,12,18,25 82:5 98:14,20</p>	<p>106:6 109:19 110:19 121:4,14 123:19 131:13 (35)</p> <p>programmatic 65:17</p> <p>programs 21:4 23:13 40:3 55:25 74:6 83:2 92:15 (7)</p> <p>prohibit 53:12</p> <p>prohibiting 47:4</p> <p>prohibition 7:19</p> <p>prohibitive 83:10</p> <p>prohibits 6:10 112:24</p> <p>project 19:25 20:6,16</p> <p>projections 76:13</p> <p>projects 60:5</p> <p>promotion 82:25</p> <p>proper 89:21 109:14</p> <p>properly 20:23 21:9 41:21 59:21 60:18 78:19 115:1 (7)</p> <p>properties 81:14 119:1</p> <p>property 22:25 37:18 41:18 44:7 79:24 80:7 82:20 101:11 117:10 124:4 (10)</p> <p>proposal 35:12 44:20 116:21 132:22 (4)</p> <p>proposals 128:6</p> <p>proposed 5 6:1 7:10 8:21 11:23 19:5 31:18 33:14 37:19 41:17 43:15 44:17 47:3,15 50:22 52:15 56:15 61:14 63:3,10 69:25 85:8 86:5 88:12 89:11,23 90:3 91:3 94:22 103:1 112:8,20 113:2,16 115:9 128:3 130:10 (37)</p> <p>prospect 94:17</p>	<p>prosperous 92:18</p> <p>protect 98:5</p> <p>protections 28:6</p> <p>proven 97:8</p> <p>proves 21:12</p> <p>provide 17:11,21 24:5,9 38:11 40:1 44:11 46:21 47:12 52:24 53:4 63:11 70:15 71:19 76:20 85:23 87:10 92:15 98:5,24 100:24,25 104:11 110:21,22 (25)</p> <p>provided 44:9 45:19 59:12 75:21 84:23 (5)</p> <p>provider 49:10</p> <p>providers 46:17 47:5</p> <p>provides 15:21 43:24 55:16</p> <p>providing 17:25 23:2 28:12 31:22 38:17 44:14 61:18 70:7 79:13 81:21 88:9 95:1 97:25 101:17 112:5 124:20 (16)</p> <p>ps 125:2</p> <p>public 7 5:8,15,15 6:12,23,25 7:4,23 12:18 13:7 14:1 17:23,25 21:14 23:2 24:6 27:5,17 31:22 37:2,15,24 45:12 47:7 50:24 51:6,19,20 52:6 53:10 56:3 59:5 65:22,23 67:9,11,13 69:12,15 73:11 75:6 77:6,11 78:9 81:19 82:9 85:24 87:13 93:20,21 97:18,25 98:3 101:21 103:25 104:7,8,9,18,19 111:16,18 113:1,5,13 120:11,22 121:11 126:15 127:18 129:11,12 130:19 131:16 133:1 140:8 (77)</p> <p>publicly 6:15 44:24</p> <p>publicprivate 43:22 100:16</p>
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

172

<p>published 5:18,25 8:22</p> <p>pukos 33:11 36:17</p> <p>pull 27:15 79:16</p> <p>punish 120:2 122:11</p> <p>punishable 45:24</p> <p>punishes 124:18</p> <p>punishing 67:10</p> <p>punitive 14:17 47:18 60:14 64:19 70:5 97:23 98:8 101:7 119:22 121:23 (10)</p> <p>purchase 35:10 47:21,24 48:9 53:1 56:20 98:20 109:22 127:6 (9)</p> <p>purchasing 48:14 106:7,10</p> <p>purpose 5:13 6:19 43:22 127:16 (4)</p> <p>purposes 7:1,14</p> <p>push 31:19 54:10</p> <p>put 16:2 50:12 75:11,12 79:22 85:8 90:9 104:9 109:4 113:20 117:8,19 118:3 119:7 123:15 133:13 136:1 137:13 (18)</p> <p>puts 22:17 55:8 129:6</p> <p>putting 28:11 40:20 118:7,9 (4)</p> <p>quality 16:9 17:4 37:5 83:2 84:11 97:22 (6)</p> <p>quarter 102:6</p> <p>quarters 30:3</p> <p>queens 4:11 33:17 34:3,20 128:10,20 129:5 132:14,20 133:12 (10)</p> <p>quick 35:4</p>	<p>quickly 13:10 21:8 35:3 46:14 64:10 66:13 (6)</p> <p>quinn 124:8</p> <p>quite 60:7 63:1 104:25,25 (4)</p> <p>r 2:2 140:2</p> <p>rafael 16:6</p> <p>rain 114:19,24 115:3 117:22 (4)</p> <p>raise 26:20,25 135:1 138:21 (4)</p> <p>raises 86:6</p> <p>ramifications 66:15</p> <p>ranging 51:25</p> <p>rat 43:15 57:13 88:6 89:19 97:21 105:16 114:5 (7)</p> <p>rate 61:24</p> <p>rather 99:11 127:23 130:20</p> <p>rats 8:6 27:12 33:22 61:12 63:13 123:8 (6)</p> <p>reach 86:23</p> <p>readily 39:17</p> <p>reading 89:14</p> <p>ready 77:13 135:8</p> <p>real 58:10 63:23 84:2 110:21 (4)</p> <p>realistic 17:15 88:21</p> <p>realistically 63:21</p> <p>realities 67:8 94:20 107:6</p> <p>reality 25:5 95:25 96:6 108:18 (4)</p>	<p>realized 125:15</p> <p>really 26:14 27:13,15,23 28:2,9,21,25 36:10 41:16 42:16 82:1,3 89:12 111:15 119:21 123:16 124:6,9 128:14 135:15 136:9,18 137:20,20,22 138:2 (27)</p> <p>realm 53:10 104:9</p> <p>realtime 130:17</p> <p>reason 7:24 59:18 120:24</p> <p>reasonably 117:19</p> <p>reasoning 120:18</p> <p>reasons 37:21 101:8</p> <p>receive 5:14 47:18</p> <p>received 9:3 27:9 103:6</p> <p>receives 9:8,9 139:4</p> <p>receiving 18:5 103:23</p> <p>recent 95:6 103:16</p> <p>recently 32:11 39:20 135:14</p> <p>receptacles 7:13 38:4 44:12,13 45:14 47:7 51:20 69:11 93:16 113:14 127:7 (11)</p> <p>reckless 100:14</p> <p>recognize 31:15 89:18 96:1 99:10 125:23 (5)</p> <p>recognizes 121:25</p> <p>recommend 18:2 81:2 88:3</p> <p>recommendations 105:23</p> <p>recommending 122:4</p> <p>reconsider 40:11 42:17 111:4</p> <p>record 5:19 8:17 9:23 140:13</p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

173

<p>(4)</p> <p>recovering 76:25</p> <p>recyclables 58:19</p> <p>recycling 7:3,21 19:10 88:4 (4)</p> <p>redevelopment 26:16</p> <p>redo 30:20</p> <p>reduce 37:8 43:13 44:3 63:12 70:22 75:8 114:21 115:8 (8)</p> <p>reduced 44:5</p> <p>reducing 8:9 61:11</p> <p>references 88:1 96:22</p> <p>refining 40:3</p> <p>refuse 6:12 7:3,20 113:1 (4)</p> <p>regarded 49:9</p> <p>regarding 6:5 43:7,8</p> <p>regina 2:15 29:5,15,19 30:10 (5)</p> <p>regular 127:25</p> <p>regularly 17:7 60:3 114:23</p> <p>regulated 6:3 96:5</p> <p>regulation 24:19 25:17</p> <p>regulations 39:8 53:16,19 91:6 97:4 (5)</p> <p>regulatory 2:3 5:4</p> <p>reimbursed 121:8</p> <p>reiterate 37:22</p> <p>rejected 115:9</p> <p>rejection 128:2 130:9</p>	<p>related 71:7 140:16</p> <p>relating 5 5:15,16 6:17 7:9 (5)</p> <p>relation 107:8 126:8</p> <p>relationship 43:11 57:10 72:25</p> <p>released 135:12,14</p> <p>reliable 132:13</p> <p>relining 61:22</p> <p>rely 84:21 113:8 114:10 124:15 (4)</p> <p>remain 37:9 62:18 64:6 70:17 88:19 98:18 99:18 (7)</p> <p>remains 107:2</p> <p>remarks 21:15</p> <p>remember 22:23</p> <p>remote 5:10</p> <p>remotely 13</p> <p>removal 47:23 86:5 118:1</p> <p>remove 13:2 37:15 45:6 46:24 47:25 53:19 84:19 113:11 117:15 (9)</p> <p>removed 19:9 45:13</p> <p>removes 95:15</p> <p>removing 41:14 112:16</p> <p>rents 8:9</p> <p>reopen 106:5</p> <p>replace 12:11 61:25 120:10</p> <p>replaced 56:25 109:22 110:9</p> <p>report 17:7 55:11 75:14 135:15 (4)</p>	<p>reported 140:11</p> <p>reporter 20 8:16 9:22</p> <p>reporting 96:7 117:24</p> <p>reports 103:16</p> <p>represent 15:14,18 80:7</p> <p>representatives 106:19 126:22 131:1</p> <p>represents 16:20 55:1 61:6 89:16 (4)</p> <p>request 67:15 90:17 110:4 112:7 121:22 (5)</p> <p>requests 117:20</p> <p>require 13:21 20:18 44:6 47:16 50:23 96:11 102:15,23 109:16 127:5 (10)</p> <p>required 84:22</p> <p>requirement 31:24 45:24 76:23 89:23 (4)</p> <p>requirements 5:12 54:13 78:12 89:1 97:6 102:18 133:15 (7)</p> <p>requires 7:10 17:19</p> <p>requiring 101:5</p> <p>rescind 14:20 121:23</p> <p>reset 67:15</p> <p>residential 57:16 73:22 88:8 98:15 117:9,11 118:21,22 120:16,20 123:23 (11)</p> <p>residents 30:8 58:12 69:7 86:1 93:9 111:17,22 114:10 119:3 (9)</p> <p>resolve 14:15 90:4</p> <p>resources 12:6 13:12 16:3</p>
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

174

<p>39:23 61:21 66:19 78:7 102:23 114:8 116:16 (10)</p> <p>respect 11:17 43:21 72:1 138:3 (4)</p> <p>respectfully 84:3 90:17 121:22</p> <p>respondents 69:15</p> <p>responding 43:7</p> <p>response 10:10,14,17,23,25 29:7 68:16,18 125:13 134:4,8,13,16,19,23 138:12,15,19,23 (19)</p> <p>responsibilities 49:21 100:21</p> <p>responsibility 12:19 44:16 48:2,3 101:21 102:22 106:15 (7)</p> <p>responsible 38:18 103:14 119:2</p> <p>responsive 18:14 80:14</p> <p>rest 44:10 82:23</p> <p>restaurant 35:1 73:20</p> <p>restricted 103:12</p> <p>restrictions 73:14</p> <p>result 13:20 42:11 49:5 50:4 56:5 69:14 73:7 93:15 (8)</p> <p>resulting 20:10 48:25 130:18</p> <p>retail 39:15 120:19</p> <p>rethink 74:12 121:23</p> <p>revealed 48:7</p> <p>reveals 95:23</p> <p>review 71:1</p> <p>revised 130:14</p>	<p>revisit 93:25</p> <p>revolution 69:20</p> <p>reynolds 4:6 112:1,2,4,5 (5)</p> <p>richmond 10:22 134:6,18 138:14 (4)</p> <p>ridiculous 14:9</p> <p>right 123:3 131:9</p> <p>rigid 7:12 38:25 50:25 53:8 127:6 (5)</p> <p>ripping 78:19</p> <p>rising 102:17</p> <p>risk 13:8</p> <p>river 58:6</p> <p>road 3:21 100:1,7 102:9 103:22,24 (6)</p> <p>rob 2:11 18:20,25</p> <p>robust 60:18</p> <p>rock 133:8</p> <p>rolled 40:8 119:18</p> <p>rolledout 100:14</p> <p>rolliebins 17:13</p> <p>rolling 74:3</p> <p>rollout 20:5 80:18 98:15</p> <p>roosevelt 34:6</p> <p>rose 100:6</p> <p>rothrock 3:5 60:23,25 61:1 (4)</p> <p>roughly 58:3</p> <p>round 79:21 132:4</p>	<p>routes 48:17 128:1 130:4</p> <p>rule 5 5:15,18,22 6:1,19 7:10,14 8:19,21 19:5 25:12 27:19 31:18 33:14 37:19 38:21,25 40:9 41:17 54:5 61:14 63:3,10,18,20 64:12 69:21 70:1,5,13 71:5 72:7 73:5 75:11 76:9 77:16 83:3 84:10,13 85:9 86:6,18,19 87:9,22 88:1,13 91:1 93:15 96:4,20 98:4 100:11,12 104:3,10,20,23 112:8,20 113:2,16 114:9 115:9 123:18 124:17 126:24 127:12,16 128:3,17 129:5 130:10 (74)</p> <p>rulemaking 42:18</p> <p>rules 6:17 7:8 11:23 12:2,13 13:19 14:17 17:16 43:8,15 45:7 50:22 52:16 56:15 93:10 94:1 119:23 120:18,24 121:23 122:3,15,23 123:9 136:7 139:9 (26)</p> <p>ruling 27:10</p> <p>run 120:24</p> <p>runs 31:25 102:10</p> <p>rush 20:10 74:10 97:5 135:25 (4)</p> <p>rushed 54:16</p> <p>ryan 33:11 36:17</p> <p>s 2:2 3:6,11</p> <p>safe 13:19</p> <p>safer 92:17</p> <p>safety 83:2 104:18</p> <p>said 41:15 73:1 77:25 110:4 116:22 120:15 132:17 (7)</p> <p>salamanca 16:6</p> <p>same 13:14 73:2 112:19</p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

175

<p>sanction 45:7</p> <p>sanitation 4 2:5 5:7 11:19 12:12,20,22 13:21,22 14:2,14,19 15:18,21,24 17:22 19:14 21:4 28:3 32:15,23 34:16 35:14 36:25 37:10 38:14 40:2 41:11 43:25 45:11 46:16,22 47:13 48:5,24 49:1,9,11,24 50:11 51:1,9 52:12 55:15 56:6 57:24 58:22 60:20 61:19 62:3 64:1 65:24 69:9 72:22 73:1,17 74:7,11 75:20,23 78:3 79:7 82:12,18,19 85:23 86:6 87:11 88:12 89:1 90:1 92:18,24 93:2,13 99:22 101:16,18 102:2,21 106:21 107:16 108:9 109:14 111:11 119:18 120:4,7,13,14 122:8 125:5,7,25 126:7 127:4,24 128:23 129:16 130:16 132:15 135:17,20 (103)</p> <p>sank 27:13</p> <p>saturday 22:5 116:6</p> <p>savage 4:10 125:11,15,17 (4)</p> <p>saw 124:7</p> <p>say 9:20 19:13 22:9 24:21 25:24 105:11,13 132:16 133:7 137:4 (10)</p> <p>saying 105:19 125:22</p> <p>sbs 18:11 70:22 96:10 108:15 120:7 123:10 (6)</p> <p>scarce 61:21</p> <p>schedule 59:17 109:15 110:23</p> <p>scheduled 5:20 35:25</p> <p>schedules 18:4,7 88:6 129:21 (4)</p> <p>schlitzer 4:7 115:12,15</p> <p>school 24:8</p>	<p>scope 103:14</p> <p>scorse 3:10 72:11,14,16 (4)</p> <p>scrapped 100:13</p> <p>scupp 43:1</p> <p>second 23:11 58:7 105:9</p> <p>secondly 103:4</p> <p>section 6:9 7:6,25 8:3 40:23,23 112:24 113:7 115:6 (9)</p> <p>sector 58:11</p> <p>secured 32:11</p> <p>see 22:11 24:11 42:7,8 84:14 99:5 117:11 122:25 136:9 (9)</p> <p>seeing 138:24</p> <p>seek 86:8 119:21</p> <p>seeks 90:3 113:3</p> <p>seems 103:2,3</p> <p>seen 119:25</p> <p>send 130:1</p> <p>sending 135:9</p> <p>senior 3:3,12 57:21 58:1 74:17,19 (6)</p> <p>sense 93:22</p> <p>sent 16:25</p> <p>sentiments 94:20</p> <p>separately 41:9</p> <p>september 35:25</p> <p>serious 59:18</p> <p>serve 34:13 49:3 50:3 68:6</p>	<p>81:13 94:13 99:20 (7)</p> <p>served 61:20</p> <p>serves 26:13</p> <p>service 23:3,3 28:13,24 31:16 32:13 39:19 44:1 45:18 47:4 48:16 49:6 59:13,14 81:20 83:8 84:10 97:19,25 (19)</p> <p>serviced 118:19 127:3</p> <p>services 6 5:17 6:22 12:10,22 13:21 15:17,22 31:13,22 38:10,14,17 40:2 43:25 44:4 46:22 47:13 48:6 49:1 55:16,23 56:6 61:18 64:1 71:18 75:16,21,23 76:21 81:22 83:15,24 84:20 85:24 86:14 87:1,11 89:25 92:15,25 93:13 95:2,13 96:8 99:16 100:20,24 101:18 102:2 120:8,11 121:19 124:20 127:4 (55)</p> <p>servicing 69:10 110:5</p> <p>serving 94:16</p> <p>set 16:22 62:6 140:20</p> <p>setout 18:3,6 57:15 78:19 (4)</p> <p>setting 69:12 80:23</p> <p>seven 48:17</p> <p>several 37:21 53:19 82:4 83:4,25 96:1 103:4 105:23 123:15 (9)</p> <p>severe 126:6</p> <p>severely 49:22</p> <p>shall 7:14 8:1</p> <p>shamefully 104:3</p> <p>share 41:10,13 50:8 51:7 52:17 61:10 63:13 94:11 99:13 (9)</p>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

176

<p>shared 14:22 28:2 44:17 52:20 54:17 86:10 95:16 (7)</p> <p>she 33:8 77:24</p> <p>sheroff 4:12 10:7 131:25 132:2 (4)</p> <p>shift 101:7</p> <p>shifting 26:17</p> <p>shines 2:16 33:6,16 34:2 (4)</p> <p>shop 57:8 103:9</p> <p>shopping 23:5 71:23</p> <p>shore 134:7,18 138:14</p> <p>short 12:2 70:17 78:13,20 (4)</p> <p>shortsighted 69:23</p> <p>should 18:4 19:13 21:1 32:19 39:23 40:10 48:21 52:24 71:8,14 72:1 79:13 80:4 81:20 84:23,24 87:23 100:12 122:6,23,25 123:18,19 135:24 137:1,22,23 (27)</p> <p>shouldered 97:11</p> <p>shout 132:13</p> <p>shoutout 22:2 82:2</p> <p>show 12:2 123:24</p> <p>showing 24:20</p> <p>shows 69:21</p> <p>sic 66:8 110:14</p> <p>side 55:3 69:8 83:22 117:2 (4)</p> <p>sidewalk 6:12 8:6 42:12 62:6 66:5 67:14 101:3 103:7 136:10 (9)</p> <p>sidewalks 6:23 32:3 34:22 37:16 42:9 43:14 66:2 93:3,17</p>	<p>102:11,13 121:12 124:5 126:13,18 136:6 (16)</p> <p>sign 123:13</p> <p>signature 140:23</p> <p>signed 9:12</p> <p>signedup 10:2</p> <p>significant 32:7 37:7 51:12 58:16 70:6 76:11,15 78:16 86:6 90:4 96:12,25 102:23 (13)</p> <p>significantly 47:11 91:1 93:12 104:23 (4)</p> <p>signup 9:15</p> <p>silent 122:15</p> <p>similar 17:11 37:14 85:2 98:11 (4)</p> <p>simple 100:12</p> <p>simply 28:9 37:25 38:17 56:9 84:6 96:15 105:19 (7)</p> <p>since 8:21 10:1 19:8 27:11 34:17 38:12 51:15 59:12 74:22 78:3,24 79:11 80:3 86:14 92:10 94:18 103:11 108:12 135:12 (19)</p> <p>sincerely 130:24</p> <p>single 116:6 119:17</p> <p>site 32:1,12 52:6 60:6 121:6 (5)</p> <p>sited 53:9 59:7 79:19</p> <p>sites 53:20 54:2</p> <p>siting 39:6 44:18 53:5,7,12 56:18 59:24 62:16 73:13 80:8,10 84:24 87:2,8 96:25 97:6 104:16 132:25 (18)</p> <p>sitting 104:1 123:7 128:24</p>	<p>situation 28:11</p> <p>situations 122:5 129:13 137:7</p> <p>six 34:5 54:4,6 59:7,25 67:1,3 73:17 92:19 109:13 121:18 133:9 (12)</p> <p>sizable 58:15</p> <p>size 39:9 52:4 92:8 104:3 (4)</p> <p>sized 53:2</p> <p>slack 93:6</p> <p>slap 38:7</p> <p>slash 28:15</p> <p>slim 91:4</p> <p>slip 6:14</p> <p>slipshot 21:8</p> <p>slope 94:17</p> <p>slowly 9:21 78:22</p> <p>smacks 43:20</p> <p>small 21:1 26:23 53:1 56:1 62:5 65:20 81:13 83:1 86:14 117:12 123:21 130:2 132:18 (13)</p> <p>smaller 13:20 21:2 34:1</p> <p>smallest 34:8 78:15 132:18</p> <p>smart 25:4</p> <p>smarter 25:19,19</p> <p>snow 122:19 132:12</p> <p>so 9:17,22 11:7 13:12 25:22 26:8 27:9,18 28:9,22,24 29:2 32:24 40:20 42:5,16,23 45:15 46:7 47:7 54:2 56:1 57:1 63:1,20 66:12 67:15 85:12 89:7,9 94:1 100:3 105:19</p>
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

177

<p>106:24 107:12,17 110:15 111:11 114:14 115:15 116:15,19,21 117:11 118:10 119:6 123:15 128:18 131:23 133:25 135:7 137:1 138:1,1 139:7 (55)</p> <p>solar 31:6</p> <p>sole 101:15</p> <p>solution 84:17 85:10 88:9,22 90:8,24 99:12 110:21 133:22 136:22 (10)</p> <p>solutions 27:20,21 32:25 40:13 47:17 51:25 53:3 54:12,15 88:15 91:9 99:20 106:3,20 137:15 (15)</p> <p>solves 27:10</p> <p>some 24:15 26:15 30:1 36:5 53:22 62:2 63:7 73:11 83:14 90:13 97:17 102:15 103:8,10 105:25 117:15 118:1,9 136:22 137:2,3,8,14 (23)</p> <p>somebody 22:17,18</p> <p>someone 14:7 46:5</p> <p>someplace 22:19</p> <p>something 24:2 28:21 131:15 137:12 138:7 (5)</p> <p>sometimes 41:21,22 84:5</p> <p>soon 62:20</p> <p>sorry 6:2 17:2 29:17 92:12 102:5 105:9 125:16 (7)</p> <p>sort 27:14,20</p> <p>sorts 124:1</p> <p>sound 119:24</p> <p>source 101:15</p> <p>sources 8:9</p>	<p>south 15:12 18:15 34:3 58:4 75:3 (5)</p> <p>space 17:12 52:6 67:9 73:11 103:25 104:19 111:16 136:2,4,10,25 (11)</p> <p>spaces 111:18</p> <p>speak 9:11,20,21 36:14 72:20 131:22 (6)</p> <p>speaker 11:3,9 16:25 30:10,13,16 68:20 (7)</p> <p>speakers 40:21,22</p> <p>speaking 107:1 128:13 131:8</p> <p>speaks 95:11</p> <p>special 132:13</p> <p>specialty 115:20</p> <p>specific 87:14</p> <p>specifically 11:22 19:7 65:18 97:2 118:13 130:12 (6)</p> <p>specify 56:16</p> <p>specifying 96:24</p> <p>spend 19:11 45:9 79:4 81:17 82:11 109:10 (6)</p> <p>spent 78:6 108:8 109:6</p> <p>speros 20 140:8</p> <p>spirit 95:16 124:23</p> <p>spoke 116:3</p> <p>spoken 118:15 128:5 130:25</p> <p>spots 59:24</p> <p>spring 121:15</p> <p>square 2:9 3:12 4:9 11:13,16 13:3,9 58:10 74:17,20 101:12</p>	<p>119:11,14 (13)</p> <p>sro 117:5</p> <p>ss 140:5</p> <p>stacking 23:18</p> <p>staff 13:15 24:16 46:15 49:11 51:14,17 57:25 66:21 70:19 82:16,17 87:6 89:9 110:7 111:8,12 124:9 (17)</p> <p>staffhours 36:24</p> <p>staffing 48:15 66:16 67:5</p> <p>staging 31:5</p> <p>stakeholder 137:23</p> <p>stakeholders 20:3 37:13 62:17,18 88:20 90:6 97:12 128:5 (8)</p> <p>standard 44:8 70:20</p> <p>standards 38:15</p> <p>standing 53:16,18 123:13</p> <p>stands 65:10 99:8</p> <p>star 133:8</p> <p>starkly 96:6</p> <p>start 11:17 22:1 36:5 51:22 105:19 125:22 (6)</p> <p>started 51:22 52:3 117:24</p> <p>starting 32:7 50:23 115:16</p> <p>startup 76:10 86:24 96:12</p> <p>state 35:21 86:2 114:3 140:4,9 (5)</p> <p>stated 17:22 44:2</p> <p>statement 8:18 9:24 10:1 60:21 (4)</p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

178

<p>statistics 90:14</p> <p>stay 31:1</p> <p>stayed 126:15</p> <p>step 12:13 59:2 69:19</p> <p>stepping 40:1</p> <p>steps 107:10</p> <p>stewardship 95:16 98:11</p> <p>still 17:18 62:20 78:24 83:17 87:19 98:6 103:1,3 125:7 133:6 139:5,6 (12)</p> <p>stolen 56:24</p> <p>stone's 132:21</p> <p>stop 28:12 56:6</p> <p>stopped 40:10</p> <p>stopping 127:17</p> <p>storage 8:12 17:12 32:2</p> <p>store 37:16 47:22 127:6</p> <p>storefront 58:13 136:12</p> <p>storefronts 136:13</p> <p>storing 83:5</p> <p>stormwater 114:21</p> <p>strain 16:2 56:12 102:20 104:9 (4)</p> <p>strained 96:14</p> <p>strategy 18:13 25:8</p> <p>strawman 27:23</p> <p>streamline 54:2</p> <p>streams 34:11 35:18</p>	<p>street 2:14 4:125 6:12 12:20 14:3 26:6,12 27:6 31:7,9 34:4,4,15,18 41:14 44:21,24 47:25 51:8 58:5,21 60:3 61:11 62:12 64:3,16 68:8,12 73:9 75:3,4,7 79:11 81:19 83:19 92:13,13 97:20 98:18 103:9,12,18 104:6,7 105:6 106:24 112:17 114:18 115:22 116:14 117:13 118:4 125:5 137:5 (54)</p> <p>streetbed 34:23</p> <p>streetplus 34:17 133:9</p> <p>streets 6:24 8:8,14 13:24 19:11,18,23 22:12 31:2 32:19 38:5 45:9 47:1 50:5 55:3,25 57:14 71:23 72:2 73:2,7 75:1 78:17 85:5,25 86:4 88:11 90:22 92:21 99:9 107:5 112:20,23 113:13 114:11,24 115:8 116:5 (38)</p> <p>streetscape 66:16 69:20 80:15</p> <p>streetscapes 135:19</p> <p>strenuously 44:19</p> <p>stretch 68:7</p> <p>stretched 13:17</p> <p>strides 32:7</p> <p>strong 47:3 57:5</p> <p>strongest 38:3</p> <p>strongly 37:11 106:17</p> <p>structural 27:13</p> <p>structured 99:15</p> <p>struggle 86:16</p> <p>students 30:8</p> <p>stuff 79:23 136:3</p>	<p>stuffing 119:1</p> <p>suarez 2:10 15:3,4,5,8,9 17:2 18:19 (8)</p> <p>subject 8:1</p> <p>subjected 56:3</p> <p>submission 8:23</p> <p>submit 8:18 139:6</p> <p>submitted 90:15 91:14</p> <p>subsequent 108:21</p> <p>subsidy 106:6</p> <p>substantial 102:15</p> <p>substantive 71:6 95:21</p> <p>successes 108:22</p> <p>successful 35:20,22 59:16</p> <p>such 6:22 7:11 8:24 16:16 17:24 30:3 72:22 78:12 82:2 86:17 106:9 110:16 127:15 131:12 140:13 (15)</p> <p>sufficient 23:21 25:13 54:11</p> <p>suggesting 136:18</p> <p>suggestion 138:6</p> <p>suggests 87:24</p> <p>suitable 39:13 41:25</p> <p>summer 23:23</p> <p>sunday 22:5</p> <p>sunnyside 2:16 33:6,16 34:2 (4)</p> <p>sunset 3:7 67:20,25 68:6 134:10,21 138:17 (7)</p> <p>superintendent 22:6 124:8</p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

179

<p>supplement 12:10 55:16 82:1 116:17 120:7,9 (6)</p> <p>supplemental 15:18,21 17:22 31:16 32:15 46:16,22 47:4,12 48:5 49:9,23 61:19 63:25 65:24 71:18,20 75:20,23 76:20 78:3 79:6 82:8,12 87:10 95:2,12 100:19 101:18 102:1 124:20 127:4 (32)</p> <p>supplementary 28:13 43:24</p> <p>supplementing 38:10</p> <p>supplements 27:7 69:9</p> <p>supplies 108:14 124:1</p> <p>supply 78:20 129:3</p> <p>supplying 45:11</p> <p>support 13:4 15:22 24:23 25:2,17 36:5 38:3 41:6 55:25 63:23 64:16 65:20 70:9 71:14,16 75:5 77:7 82:3 83:1 106:4 118:2,23 124:6 (23)</p> <p>supported 119:17</p> <p>supporting 7:1 71:10</p> <p>supportive 28:16</p> <p>supports 31:17 37:11 43:12 66:9 73:8 105:14 124:24 (7)</p> <p>supposed 27:22 35:13 56:17 80:1 (4)</p> <p>sure 42:20 80:21 133:11</p> <p>surrounded 118:20</p> <p>surrounding 114:24</p> <p>survey 69:15</p> <p>suspend 93:12</p> <p>suspended 121:15</p>	<p>sustainability 112:12</p> <p>sustainable 88:21 99:14</p> <p>swath 117:1</p> <p>swaths 73:25</p> <p>sweep 92:21</p> <p>sweepers 58:21</p> <p>sweeping 6:22 34:19 69:11 133:10 (4)</p> <p>sweeps 13:23 37:25 44:25</p> <p>sync 121:10</p> <p>system 124:12 129:15,24 130:14,20 (5)</p> <p>t 140:2,2</p> <p>tackling 88:11 89:19</p> <p>tailored 65:18</p> <p>take 20:9 54:14 56:8 74:11 81:18,21 90:5 116:7 118:2 136:24 (10)</p> <p>taken 107:11</p> <p>takes 22:18 66:4 67:3,4 75:18 115:21 136:9 (7)</p> <p>taking 26:9 89:9 116:12 118:8 133:6 (5)</p> <p>talking 115:17</p> <p>target 43:17</p> <p>task 27:24 60:1 97:11</p> <p>tasked 101:17 125:25</p> <p>tax 101:10</p> <p>taxes 123:16</p> <p>taxing 123:24</p>	<p>taxpayers' 23:6 24:23</p> <p>team 34:18 69:9 92:18 110:1 130:1 (5)</p> <p>teams 14 25:15 131:13,20 132:7 (5)</p> <p>technology 37:8</p> <p>telling 117:3,7</p> <p>tells 22:14</p> <p>tenants 77:4 117:4,7</p> <p>tens 19:23 45:16 51:13 96:11 (4)</p> <p>tepelus 2:12 21:21,24</p> <p>term 106:9</p> <p>terms 105:15</p> <p>terrific 41:12</p> <p>test 108:18</p> <p>testify 9:13,15,16,18 10:3 11:4 29:4,22 33:4 42:25 46:3,6,9 47:2 85:21 92:4 119:13 132:3 134:25 135:7 138:8,21 (22)</p> <p>testifying 11:8,10 61:2 100:5 139:2 (5)</p> <p>testimony 2:8 3:2 4:2 10:4 21:16 41:8 54:19 90:16 91:15 94:11,19 112:5 116:25 119:7 135:8 (15)</p> <p>text 55:8,21</p> <p>than 14:7 19:9 54:4 79:4 81:14 84:25 95:11 100:15 101:25 104:21 111:12 130:20 136:4 (13)</p> <p>thank 5:8 6:8 11:11,14 14:24,25 18:17,18,24 19:4 21:16,18 25:22 26:2,3,8 29:2,3</p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

180

<p>30:25 33:2,3,12 36:12,13,18,20,21 40:16,17 42:23,24 46:2,4 50:13,14,21 54:18,20 57:18,19 60:22 64:23,24 67:17,18,22 68:25 72:9,10,14,19 74:14,15 77:17,18 81:4,5,9 85:12,13,18,20 88:23 89:3,7,8 91:13,16,17,22 92:3 94:4,5,9 99:23,24 105:3,4 107:17,20,21 111:24,25 115:10,11,15 116:9 119:6,9,12 125:1,9,10 128:8,9,21 130:25 131:4,21,21,23 132:2,5,10 133:25 134:1 135:7 138:1,9 139:2,11 (111)</p> <p>thankless 11:19 125:23</p> <p>thanks 22:2 41:10 66:1 115:16 128:13 (5)</p> <p>their 6:4 11:20 13:17,18 21:3 31:11 40:15 41:12 48:6 49:12,17 53:6 64:11 76:6 79:10 81:18 91:2 92:4 93:19 97:13,18 103:9 115:23 117:3,7,9,10 118:3 119:1,3,20 126:2,3 127:8,25 129:9,10 131:6 136:11,13 (40)</p> <p>them 11:20 12:11 35:4,5 36:10 37:16 39:19 41:24 44:14 46:19 47:8,25 49:16,17 52:6 100:22 105:22 109:5 111:20 115:23 118:3 122:22 123:6 130:17 137:15,16,18,23 138:5 (29)</p> <p>themselves 6:8</p> <p>there's 35:9 42:2 62:15 63:7,8,23 78:20 102:10 103:19 123:2 124:13 129:15 136:14,17 137:7 (15)</p> <p>therefore 42:16 90:1</p> <p>these 8:6 10:19 11:23 12:2,12 13:19 14:20 16:14,23 17:2,7,16 24:9 26:21 28:25 31:8 35:18 39:1,6,24 41:22 46:17 48:1,20,21 49:13 51:11</p>	<p>52:9,14,15,19,19,25 54:8,13 56:18 58:15 62:12,21 72:24 84:3 86:9 87:2,11 88:24 91:3,5 93:10 94:1 97:12,13 117:6 118:24 119:23 120:18,23 121:23 127:5 129:13,22 133:15 136:19 137:19 (63)</p> <p>they're 27:23 56:22 101:3 111:12 124:9,13 136:21 (7)</p> <p>thing 73:2</p> <p>things 68:5 83:20 116:18</p> <p>think 33:19 41:15 52:3 66:4 80:23 111:7,21 122:11 124:15 132:11 135:21 136:14 137:1,11,22 (15)</p> <p>third 2:10 15:3,10 27:3 55:14 76:14 109:5 133:7,7 (9)</p> <p>thirdly 103:24</p> <p>those 9:10 12:9 40:4 62:2,6 63:8 86:18 107:8 109:7 110:21 112:22 117:15,17,17 118:7 122:22 (16)</p> <p>though 22:24 110:13</p> <p>thoughtfully 21:9</p> <p>thousands 19:25 45:16 51:13 86:24 96:11 (5)</p> <p>threat 50:2 105:1 127:9</p> <p>threatening 120:2 129:10</p> <p>threatens 31:20 73:5 99:16</p> <p>three 10:1 19:9 29:24 59:13 82:6 92:20 109:3 123:2 130:14 (9)</p> <p>threeminute 10:4</p> <p>threeperson 82:7,17</p> <p>thrive 27:18 66:1</p>	<p>thriving 74:24</p> <p>through 9:3 14:17 16:13 32:10 45:18 67:5 86:4,13 89:21 97:7 101:9 104:17 112:13 121:4 128:24 (15)</p> <p>throughout 42:5 44:10 65:21 66:24 93:5 100:17 112:15 129:1 (8)</p> <p>throw 132:21</p> <p>throws 67:13</p> <p>tickets 103:17,23</p> <p>tiedup 64:3</p> <p>tiera 4:5 107:22,25</p> <p>tightfitting 7:13 127:7</p> <p>time 9:17 10:5 14:4 20:9 25:13 26:9 37:8,15 39:22 51:14 54:7,12 66:14 67:5 74:10 78:6,13 79:22 80:19,20 81:3 82:16 85:4 88:4 89:10 90:16 94:10 97:8 110:11 119:6 121:8 126:12 129:10 130:23 134:14 137:19,19 138:1,8 139:13 (40)</p> <p>timeframe 26:25</p> <p>timeline 17:15 19:17 33:25 66:8 (4)</p> <p>timelines 87:8</p> <p>timely 54:3</p> <p>times 2:9 11:13,16 13:3,9 18:3,6 29:1 53:17 57:16 59:13 63:14 83:18 84:15 (14)</p> <p>timing 76:23</p> <p>tisch 16:7 59:4</p> <p>today 5:20 8:16,22 9:1,4,8 11:5 26:10 47:2 50:22 58:9 61:2,8 63:2,18 72:20 89:10</p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

181

<p>94:12 98:12 128:5 130:25 131:5,19 135:9 139:3,8 (26)</p> <p>together 9:4 14:15 22:8,18 25:8 57:14 94:2 95:18 110:23 128:15 (10)</p> <p>tom 2:9 11:12,15</p> <p>tons 58:18,19 118:25,25 (4)</p> <p>too 53:7 57:3 62:20 129:14 133:18 (5)</p> <p>took 73:16</p> <p>top 31:1</p> <p>topdown 95:25</p> <p>topic 33:19 51:16</p> <p>total 121:18</p> <p>totally 68:10 121:10,15</p> <p>tourists 45:17</p> <p>toward 31:17 81:24</p> <p>towards 45:23 49:18 62:4,24 77:14 (5)</p> <p>traffic 23:22 30:2 38:24 77:2,5 97:5 (6)</p> <p>trafficked 15:17 30:2</p> <p>transcript 9:5 140:13</p> <p>transformation 74:23</p> <p>transformational 54:8</p> <p>transit 123:6</p> <p>transition 70:9 71:10</p> <p>transparency 106:18</p> <p>transport 23:9 31:8</p> <p>transportation 97:8</p>	<p>transports 14:1</p> <p>trash 4:11 19:10 22:14,18 23:9,18 24:6,17 27:17 31:6,9,25 32:4,8 34:20,25 35:2,15 37:8,15 41:21 47:21 50:4 51:20 56:2,3,8,16 58:18,20,20 59:5,9 60:16 61:23 62:1,11 64:4 66:5,10 67:6,11,12,12 69:13,18 70:19 71:20,21 72:7 73:11,15,21 77:11 78:16,17,25 79:3,10 81:19 82:9 85:25 86:5 87:13,24 88:4 92:21 93:16,20,21,21 97:18 98:1,3 101:1,22 102:4,5,14 103:7,8,14 104:24 105:16 106:2 112:17 113:4,11,19,21,22 114:7,16,23 115:8 116:8,9,23 117:9,9,12,21,25 118:3,4,9,10,22 119:3 120:11 121:11 128:11,20 129:14 130:3 (115)</p> <p>travel 53:13,15</p> <p>treasurer 41:4</p> <p>treating 38:6</p> <p>tree 4:8 115:14,21 116:5 (4)</p> <p>trees 65:22 115:22,24 116:7 (4)</p> <p>tremendous 74:1 133:12</p> <p>tricks 31:3</p> <p>tried 123:12</p> <p>triplefamily 117:5</p> <p>troubling 69:25 95:23 97:24 103:19 (4)</p> <p>truck 129:21</p> <p>trucks 31:4 47:8,24 48:2,16 (5)</p> <p>true 14:14 86:21 109:17 140:13 (4)</p>	<p>truly 27:25 28:21 29:21 31:13 50:6 (5)</p> <p>trump 123:4</p> <p>trusted 61:17 95:4 109:17 122:1 (4)</p> <p>try 41:23 82:21 133:21</p> <p>trying 22:7 26:24 76:2 116:4 124:9 137:1 (6)</p> <p>turn 45:22</p> <p>twice 35:5</p> <p>two 19:11 31:3 39:8 47:17 54:11 78:23 83:9,23 121:6,9,13,19 128:24 129:18 130:11,21 (16)</p> <p>twowheel 136:6</p> <p>type 20:6 24:9</p> <p>types 38:23 63:4 87:23 96:21 (4)</p> <p>ultimate 63:12</p> <p>ultimately 38:18 49:4</p> <p>unable 48:20</p> <p>unaffected 43:19</p> <p>unaffordable 23:12</p> <p>uncertainty 88:2</p> <p>unclear 39:18</p> <p>unconscionable 45:25</p> <p>under 13:16 76:4 82:5 102:6 108:15 127:9 (6)</p> <p>undergoes 60:4</p> <p>undermine 43:10 99:16 121:1</p> <p>undermines 100:15 124:23</p>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services

February 10, 2025

182

<p>underserved 114:9</p> <p>understand 9:23 67:7 75:5 88:10 110:25 119:4 (6)</p> <p>understanding 12:3 25:23 64:9 69:21 84:2 (5)</p> <p>understands 37:3 45:20</p> <p>understates 84:6</p> <p>undertake 31:11</p> <p>undertaking 44:15 74:2 96:17</p> <p>undue 70:6 129:6 133:13</p> <p>unfair 77:9 85:5</p> <p>unfairly 43:17 97:14</p> <p>unfortunately 42:11 62:8 73:5 121:14 (4)</p> <p>unfunded 11:24 28:18 36:7 62:9 124:17 (5)</p> <p>uniformed 125:24 138:3</p> <p>unilateral 20:4</p> <p>unilaterally 19:21</p> <p>unintended 39:3 97:16</p> <p>unique 38:22</p> <p>uniquely 12:4</p> <p>unit 136:8</p> <p>united 128:16</p> <p>units 31:6 121:6</p> <p>university 30:8</p> <p>unjust 87:16</p> <p>unknown 11:3,9 16:25 30:10,13,16 (6)</p>	<p>unless 44:4 79:15</p> <p>unmuted 125:16</p> <p>unsanitary 43:14</p> <p>unsightly 43:13</p> <p>unsuccessful 37:14</p> <p>until 25:12 121:15 139:7</p> <p>unusually 14:10</p> <p>unwanted 17:3</p> <p>up 8:8 9:12 10:3,12,16 13:6 14:22 21:20 27:17 34:19 35:3 40:19 41:24 42:25 44:25 50:15 58:21 64:22 67:11,19 69:12,12 71:2 74:16 77:19 78:2,16,19 79:7 80:23 83:18 88:1 107:22 110:11 114:17 115:12 118:12 119:5,10 121:24 123:1,6 125:11 128:10 129:22 131:8,25 133:4,6,10 136:24 (51)</p> <p>updated 130:11</p> <p>upfront 86:2</p> <p>upon 6:12</p> <p>urban 97:2</p> <p>urge 28:22 32:23 36:10 40:2 50:11 55:7 85:8 93:25 98:12,12 (10)</p> <p>us 14:10 20:1,18 22:8,14 23:12 24:1,2 25:13 28:2,11 34:12 35:7,18 36:4 40:12 59:15 60:5 67:10 81:16 82:3,7 83:10,10,14,16 84:7,19,24 85:10 90:21 93:11,19 95:7 101:19 109:17,18 110:22 112:22 116:21 118:2 121:8,24 124:10 127:15 129:17 131:22 132:23 (48)</p> <p>use 8:11 17:6 55:20 56:17 87:23 89:24 118:4 122:22</p>	<p>135:1 136:2 138:21 139:9 (12)</p> <p>used 53:13,14 106:13 123:13 131:2 (5)</p> <p>useful 53:24</p> <p>user 108:1</p> <p>users 66:3</p> <p>uses 108:25</p> <p>using 53:15 57:16 84:1 108:11 129:2 136:21 (6)</p> <p>usually 131:15</p> <p>valuation 101:12</p> <p>value 14:13</p> <p>values 45:21</p> <p>valuing 14:19</p> <p>variety 51:24</p> <p>various 65:16</p> <p>vary 92:7 101:13</p> <p>vast 13:13 73:24</p> <p>vending 103:18</p> <p>vendor 111:10</p> <p>vendors 16:16 103:9,21 104:8 (4)</p> <p>venue 35:2</p> <p>vermin 8:6</p> <p>version 79:25,25</p> <p>versus 80:5</p> <p>very 11:11,14 14:25 18:18 21:16,18 26:3 29:3 33:3 34:19 35:1,3,20 36:13 46:4 49:8 50:14 52:11 54:20 56:25</p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

183

<p>60:9,22 64:20,24 66:19 72:10 77:18 81:5 82:14 89:3 91:17 94:5 99:16,24 101:23 105:4 106:22 107:21 111:25 118:16 119:9,12 124:4,24 127:14 128:9 132:13 133:2 134:1 136:20 138:9 (51)</p> <p>vetted 97:7</p> <p>via 13</p> <p>viable 71:9</p> <p>vibrant 8:13 23:16</p> <p>vice 3:10 50:18 72:12,16 74:19 (5)</p> <p>vicinity 7:4,22 113:5</p> <p>viewing 9:5</p> <p>views 12:12</p> <p>village 4:12 10:8 132:1</p> <p>vincent 22:6</p> <p>violates 124:22</p> <p>violating 7:19</p> <p>violation 46:1 76:14</p> <p>violations 8:2</p> <p>virginia 4:125 105:5</p> <p>vision 14:22</p> <p>visiting 122:18</p> <p>visitors 58:14 69:7 71:23 76:3 86:1 93:9 (6)</p> <p>vocal 133:2</p> <p>voice 94:21</p> <p>volume 13:1 67:7</p> <p>voluntarily 43:23 62:5,24</p>	<p>voluntary 45:22</p> <p>volunteer 112:13 125:19 126:25 127:21 129:8 130:6,12,15 (8)</p> <p>volunteers 112:16 116:17 126:10,17 (4)</p> <p>voted 79:16</p> <p>vp 3:12,15 74:17 85:15 (4)</p> <p>wage 102:19</p> <p>wages 111:9</p> <p>walking 71:23</p> <p>walkthrough 16:5</p> <p>want 11:16,20,22 19:4 22:9 24:1,5 30:20 32:17 33:23 41:6 42:16 45:8 61:9 68:4 73:2 86:2 92:3 111:9 118:12 125:22 133:6 (22)</p> <p>wanted 116:25 132:9</p> <p>wants 22:11 64:15</p> <p>warehouses 62:3</p> <p>wasn't 125:16</p> <p>waste 4:13 5:16 6:6 8:5,11 17:23,25 20:24 21:6 31:1 37:1,23,24 38:25 44:12 45:12,13 47:7 51:19 58:16,25 69:10 70:10 71:11 78:9 87:14 98:2 106:3,14 114:8,13 115:2 125:4 135:5,11,13,24 136:23 137:21 (39)</p> <p>waterways 6:14</p> <p>way 20:5 21:13 27:10 35:16 40:7 42:2 81:1 104:24 111:3,10,12 115:1 129:17 133:19,24 135:18 136:3,11,24 138:5 140:17 (21)</p> <p>ways 25:4 36:5 65:17 78:25</p>	<p>136:15 (5)</p> <p>we'd 83:4 105:22 116:8 118:23 (4)</p> <p>we'll 68:20</p> <p>we're 19:16 25:1 26:18 27:15 33:19 34:8 35:12,16,22 42:6,6,7 56:17 69:4 78:10 81:25 84:25 128:16 135:10 (19)</p> <p>we've 19:8 51:23 73:3 78:2,22 83:22 137:18 (7)</p> <p>weather 23:22</p> <p>website 6:1 9:5 139:9</p> <p>week 48:17 52:11 133:10</p> <p>weekly 130:4</p> <p>weeks 9:6 129:18,18 130:21 (4)</p> <p>weigh 57:3</p> <p>weight 27:15</p> <p>welcome 5:3 44:18 77:3 107:14 (4)</p> <p>welcoming 76:1</p> <p>well 34:6,9 49:8 86:7 87:4 105:17 107:9 122:24 (8)</p> <p>went 125:6</p> <p>west 58:5 65:8 69:8 75:3,4 92:12,13 123:4 (8)</p> <p>wharf 6:13</p> <p>what 17:12 23:17 24:12 63:4 78:10 80:17 84:6,13,25 90:11 101:18 105:25 111:19 113:10 116:3 117:4 120:9 123:1,1 131:1,8 132:7,16 136:17 137:18 (25)</p>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services

February 10, 2025

184

<p>what's 74:10 84:8 136:18</p> <p>whatnot 117:6</p> <p>whatsoever 63:11</p> <p>wheeliebins 27:22 87:25 96:22</p> <p>when 9:20 20:14 21:6 27:9 35:25 53:5 64:9 73:20,22 80:7 101:2 103:7 104:4,5 108:12 109:20 110:25 121:15 123:1,5 124:13,13 126:3,5 130:4 (25)</p> <p>where 24:25 42:4 52:5 53:9 59:22 80:22 114:10 117:17 (8)</p> <p>whereof 140:19</p> <p>whether 6:15 39:18</p> <p>which 9:12 11:23 16:12 17:19 19:2 21:3 23:10 24:13 26:12,20 27:3,10 41:8 45:20 53:23 55:15 56:17 61:23 62:16 63:6,13 64:19 72:24 79:7 82:2,6,7,12 83:13 84:20 86:23 87:10,19 89:20 92:8,20 97:3 98:18 101:13,23 106:12,25 108:9 109:23 110:17 111:16 114:1 115:4,21 116:25 117:2,23 121:18 123:16 129:13 131:15 136:20 (57)</p> <p>whichever 79:18</p> <p>while 9:14 12:11 31:17 35:19 40:6 43:19 62:1,10 66:9 69:18 75:5 77:7 86:9,19 87:24 94:19 96:23 98:4 99:21 110:6 117:17 118:17 119:20 129:24 (24)</p> <p>whitaker 132:14</p> <p>who 9:11 11:19 13:6 31:21 45:17 46:15 48:4 49:11 55:16 66:6 85:3 87:4 89:15 91:11 98:10 103:10 108:25 117:3,7 118:2,24 122:22 128:5 129:8,16 132:5 133:9 (27)</p> <p>wholly 63:6 76:18</p>	<p>whom 61:7</p> <p>why 63:8,13 116:25 124:22 (4)</p> <p>widely 101:13</p> <p>will 8:17 9:2,6,10 10:18 13:19 19:17,25 20:8 23:9,21,23 28:19 33:8,21 35:23 39:3 42:10 43:9 46:8 47:10,15,20 49:11,22 50:4 56:2 63:5,6,24 64:19 70:3 72:7 75:11,11 80:13,24 81:21 83:19 87:2,18 89:14,25 90:1,13,25 93:10,15 102:14 103:13 104:12,17,23 106:18 109:16 114:17 118:2 122:9 129:19 132:23 133:13,23 135:8 139:3 (64)</p> <p>willfully 27:21</p> <p>williamsburg 26:14</p> <p>winter 126:3</p> <p>wise 32:10</p> <p>wish 9:11,18</p> <p>wishes 71:25 134:25 138:20</p> <p>wishing 9:15,16</p> <p>withdraw 112:8</p> <p>within 7:3,22 9:6 26:25 90:2 107:20 113:5 127:12 140:9,12 (10)</p> <p>withintitled 140:12</p> <p>without 26:21 36:9 40:15 63:17,22 66:14 70:1,7 84:19 86:15 90:23 91:1 96:16 106:21 115:1 127:25 131:17 (17)</p> <p>witness 140:19</p> <p>women 11:18 41:11 46:15 49:10,13 50:3 125:24 (7)</p> <p>won't 87:18</p>	<p>wonderful 22:4 24:10,25,25 139:12 (5)</p> <p>work 12:3 14:15,21 18:2 24:22 27:8 31:12 32:20,24 34:10,12,16,16,22 35:17,19 40:10,12 41:12,23 42:6,18 43:18 46:18,19 49:24 50:9,13 51:9 53:2 55:17 57:8,9,14 59:16 60:4 64:18 66:6 67:5,10 69:10,14 71:20 80:12,17 81:24 85:9 92:5 93:23 94:2 99:18 104:17 107:18 110:23 111:13 121:24 125:23 129:7,7,17,24 137:14,16,18,25 (65)</p> <p>workable 88:15</p> <p>worked 37:12 64:13 92:23 111:11 124:11 (5)</p> <p>worker 133:14</p> <p>workers 69:7 76:2 86:1 98:5 123:17 127:24 128:22 129:22 130:2 135:20 (10)</p> <p>workforce 49:7</p> <p>working 22:2 25:3 28:15 44:18 66:21 84:16 90:7 106:19 107:3 114:3 117:25 137:20,22 (13)</p> <p>works 21:11 112:10 123:9 138:7 (4)</p> <p>world 26:1</p> <p>worst 117:15</p> <p>would 14:20 16:18 17:10 20:1,5,18,22 23:12 31:19 35:7 36:4 39:19 41:17 44:20 46:6 48:2,9,18,23 50:23 52:8 53:23 54:14 55:22,23 56:13,18 57:3 59:18,19 60:14 62:13 64:3 68:12 73:1 74:4 79:3 83:11,12,13,17,17 84:7,9,10,14 85:6 90:11 102:22 103:10 107:10 109:10,12 110:1 111:2 112:21 113:16,19,24 114:9,17 115:4 116:6 123:20 126:23</p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services**

February 10, 2025

185

<p>127:13,20 131:10,18 133:18 136:24 139:5,6 (73)</p> <p>wouldn't 63:16</p> <p>writing 103:17</p> <p>written 8:19,20,23 9:3,9 21:16 24:19 31:19 66:19 75:16 90:15 91:15 98:19 126:24 128:3 129:6 130:10 139:6 (18)</p> <p>wrongly 101:19 103:22</p> <p>x 2,8</p> <p>yards 3:6,11 65:2,7,9 72:13,18 (7)</p> <p>yeah 15:7 29:13 112:2 135:6 (4)</p> <p>year 16:4 17:17,19 19:12,14 20:13,20 25:11 28:4 36:3 45:10 46:21,25 48:5,18 51:5 54:11 58:17 72:23 76:15 78:24 82:12 123:25 (23)</p> <p>years 37:13 49:6 50:10 61:16 62:25 73:4,12 75:18 78:1,6 82:4 84:1 92:24 95:11 100:15 116:2 125:3 126:16 (18)</p> <p>yen 10:12,15 134:2,15 138:10 (5)</p> <p>yes 15:5 26:11 29:17 30:22,22 43:3 67:22 81:10 91:22 132:17 (10)</p> <p>yet 17:18 54:5</p> <p>york 3 5:23 6:9 7:6 8:8,15 21:12 25:6 41:4 46:13 49:7 57:7,11 64:7,22 69:5,20 71:22 92:5,7,23,25 93:6,7 94:3,24 95:19 99:14 100:17 111:18 114:2 126:5 140:4,9 (34)</p> <p>york's 38:3</p> <p>yorker 129:2</p>	<p>you're 30:10,13 42:8</p> <p>you've 61:7 63:2</p> <p>your 9:19,20,24,25 10:3 22:16 23:11 25:14 30:20 88:23 89:13 99:23 107:12 116:20 119:6 (15)</p> <p>zero 4:13 14:3 135:5,13 (4)</p> <p>zone 114:5</p> <p>zones 106:4</p> <p>zoom 131:12</p> <p>211 17:8</p> <p>230 48:10</p> <p>247 18:8 32:5 101:6</p> <p>250 112:15</p> <p>300 15:15 55:2 100:9</p> <p>311 117:20</p> <p>324 58:18</p> <p>352 48:17</p> <p>365 101:6</p> <p>400 69:12</p> <p>550 31:8</p> <p>600 58:22</p> <p>1000 58:18</p> <p>1100 58:13</p> <p>1202 139:13</p> <p>1986 94:18</p> <p>1987 92:10</p> <p>2002 19:6</p>	<p>2008 34:18</p> <p>2009 74:22</p> <p>2017 135:14</p> <p>2020 126:5</p> <p>2022 59:3 108:12 121:3</p> <p>2023 59:7 109:20</p> <p>2024 5:19 109:10 112:14</p> <p>2025 12 5:21 17:14 20:14 50:24 140:20 (6)</p> <p>2026 20:22 25:12 36:3</p> <p>3600 112:16</p> <p>10000 61:25</p> <p>12000 102:4,5,14</p> <p>13000 126:19</p> <p>16120 112:24 113:7 115:6</p> <p>20000 16:19</p> <p>22000 31:9</p> <p>35000 30:8</p> <p>39000 109:4</p> <p>40000 51:4</p> <p>50000 35:7 69:6</p> <p>65000 30:7</p> <p>67000 58:12</p> <p>80000 36:24</p> <p>85000 30:9</p> <p>200000 37:1</p> <p>230000 58:11</p>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

In Re Public Hearing DSNY Proposed Amendments to Rule Relating
to Entities Engaging In Cleaning Services

February 10, 2025

186

350000 27:3

360000 34:7