

From: [REDACTED]
To: [NYC Rules \(DSNY\)](#)
Cc: [REDACTED]
Subject: [EXTERNAL] Brooklyn Community District 2- Containerization Requirements
Date: Friday, May 29, 2026 9:26:44 AM

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We manage a property in Brooklyn Community District 2. It's our understanding that as part of the DOS' pilot program, large and medium residential buildings in District 2 would be able to "opt-in" to using stationary on-street containers from July 1-July 31, 2026, and then start using these containers by October 15, 2026. Is it assumed that if a building does not opt-in to participate in the pilot program that they will not be required to containerize until mandated to do so?

Thank you for your guidance.

STEVEN HIRSCH
Executive Managing Director

Direct 929.521.7749

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From: [REDACTED]
To: [NYC Rules \(DSNY\)](#)
Subject: [EXTERNAL] Medium and Large Building Containerization
Date: Wednesday, May 20, 2026 10:53:01 AM

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I would suspect that by now the city must know what works and doesn't work for the pilot program. Roll it out in full by October 2026 and tweak it as you go along. We want trash bags off the streets and sidewalks ASAP! These medium and large residential buildings are rat, skunk and raccoon magnets. It's disgusting. They rip open the bags and leave a mess. Some supers don't clean it up for days.

The biggest problem is loss of parking spaces so more parking needs to be made available elsewhere. Free parking is definitely needed in the outer boroughs but losing parking in Manhattan is critical as well. All medium and large buildings should have increased required mandatory parking facilities for the residents and a certain amount of parking spaces available to non residents to make up for the loss of parking spaces by the Empire Bins and other bin requirements. Maybe signs out front posting the number of spaces available to non residents and/or digital vacancy signs showing the number of vacant parking spaces available. Less parking means more driving looking for a parking spot and more pollution, more chances of accidents and more time wasted looking for parking.

<https://rules.cityofnewyork.us/rule/relating-to-containerization-requirements-for-buildings-containing-10-or-more-dwelling-units/>

From: [REDACTED]
To: [NYC Rules \(DSNY\)](#)
Subject: [EXTERNAL] NYLCV Comments on DSNY's Proposed Containerization Rule
Date: Friday, June 12, 2026 12:04:24 PM
Attachments: [NYLCV Comments - DSNY Containerization Requirements Rule Hearing - 6 17 26.pdf](#)

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Hello -- Please see the attached comments on DSNY's proposed containerization rule on behalf of the New York League of Conservation Voters.

Please let me know if you have any questions.

Thanks,
Alia

--

Alia Soomro (she/her)
Deputy Director, New York City Policy
New York League of Conservation Voters
asoomro@nylcv.org
www.nylcv.org

From: [REDACTED]
To: [NYC Rules \(DSNY\)](#)
Cc: [REDACTED]
Subject: [EXTERNAL] On Street Trash Container Pilot Program
Date: Saturday, May 16, 2026 8:22:35 AM

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I saw on Reddit that the pilot program is only now just rolling out to Brooklyn. I did a deep dive of the program areas and was surprised to find this is only in Manhattan right now.

I find this “interesting” because I live on the border of Flatbush and PLG yet DSNY has been prowling the neighborhood since end of last year enforcing and ticketing local buildings for this same infraction. My building received a ticket, my friend’s building received a ticket, and I’ve seen them writing and leaving tickets on local brownstones. Specifically the tickets were for not using the new containers for pick up.

Can you explain to me why this program is only now just expanding into Brooklyn yet officers have been in a predominantly black and immigrant neighborhood issuing tickets to local homeowners and smaller condo buildings instead of doing better community communication and education of the program and going after the larger apartment complexes that aren’t well maintained by their slumlord landlords which cause the rat issues.

I’ve included local community leaders on this email so they are aware of what is happening locally in Flatbush and look forward to your prompt response.

From: [REDACTED]
To: [NYC Rules \(DSNY\)](#)
Subject: [EXTERNAL] Public comment - DSNY-Proposed-Amendment-Containerization-Requirements
Date: Thursday, June 11, 2026 1:13:18 PM
Attachments: [DSNY Public Comment - Containerization.pdf](#)

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Katie Overdevest
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

June 11, 2026

DSNY - Bureau of Legal Affairs
125 Worth Street Room
Floor: 710
New York, New York 10013

To the Department of Sanitation,

I am writing to submit public comment on the proposed rule to extend the Manhattan Community District 9 (M9) containerization pilot through October 2027 and expand it into Brooklyn Community District 2.

I write as a resident of M9 with direct experience of the program. My block has been part of the M9 pilot for the past year, and prior to that we participated in the original 10-block shared containerization pilot. I want to be clear up front: I am a strong supporter of containerization. When we moved to shared bins, rat sightings on our block dropped significantly. The program works. I am writing because I want the citywide rollout to succeed, and the M9 experience has surfaced specific, fixable problems that the city should address before expanding.

Over the past year, rat sightings on my block have climbed again. Based on my own observations and conversations with building superintendents, the rollout left meaningful gaps in coverage, enforcement, and clarity. My block is a good cross-section of building types — townhomes, small apartment buildings, mid-sized buildings, and large buildings — so the issues below reflect the full range of what the program will encounter elsewhere.

What is working: Townhomes have largely made the switch. There are still occasional stray bags, but in general the smallest buildings are using their bins. Large buildings that received Empire Bins are generally in good shape where the bins are actually being used.

Issues that should be addressed:

1.

Don't leave mid-sized buildings (10–30 units) in limbo, and don't rely on owners to opt in. The "choice" between Empire Bins and individual bins was a failure in practice, and the application process broke down even for larger buildings. One superintendent on my block services 557, 559, and 561 W 149th St — a 60-unit complex in total. His owner never applied for an Empire Bin, so early in the pilot he was left without one

despite being well above the 31+ unit threshold. He eventually procured a bin a few weeks later, but only because neighbors stepped in to help. The combination of unit-based restrictions and an opt-in application process created real confusion at the outset, and the disconnect between owners (who make the application decision) and supers (who handle the trash daily) left coverage gaps. My recommendation: give larger buildings Empire Bins directly rather than relying on owners to apply, and allow mid-sized buildings to share Empire Bins, rather than leaving the decision optional.

2.

Address large buildings that front an avenue but set out trash on the side street. Buildings situated on avenues with bus lanes or commercial parking often have their trash facilities at the back, opening onto the side street rather than the avenue — and several of these did not receive Empire Bins. For example, the large building at 1800 Amsterdam Ave (also addressed 501 W 149th St) has no Empire Bins. The same is true at 3612 Broadway and 3610 Broadway, both large buildings whose trash empties onto 149th Street. With no containers, these buildings have gone back to bagging trash the old way. In one case, a building near 503 W 149th St has been stacking bags in front of an empty townhome at 505 W 149th St. The result is that you cannot walk down 149th Street anymore without encountering rats. This was solved during containerization and has regressed purely due to coverage gaps.

3.

Clarify the bin requirement. As of June 1, residents were told they were required to use an official DSNY bin, but in practice people are still using a wide variety of bins and the side-loading trucks clearly are not yet in service for them. This sends a mixed signal. Please make the actual requirement and timeline unambiguous.

4.

Enforce against bad trash storage. Many large buildings line chewed-through plastic bins against the building. When those bins fill, tenants leave trash beside them, and the rats remain well fed. An Empire Bin on site does not guarantee the supers are using it daily; often they consolidate trash and only later move it to the Empire Bin, leaving overflowing plastic bins in the meantime. See 551 W 149th St, where plastic bins overflow daily, and 503 W 149th St, where you can see four to five rats on top of the bins most nights.

5.

Restore consistent enforcement and ticketing. During the original 10-block pilot, DSNY documented conditions with photos twice a day, and that accountability is what made the program work. Please resume the photo-based enforcement that was effective in the first pilot and actually ticket non-compliant buildings.

6.

Bring back daily pickup, especially if mid-sized buildings could share Empire Bins. The single biggest difference-maker during the 10-block pilot was daily collection — trash never had time to accumulate or attract rats. I strongly urge you to empty Empire Bins daily, and to allow mid-sized buildings to share Empire Bins rather than leaving them with individual bins. Combining daily pickup with shared Empire Bins for mid-sized buildings would solve both the capacity problem and the coverage gaps at once, and it is the change most likely to keep rat populations down as the program scales.

The throughline across all of these is accountability and consistency. Where the city held building owners and supers to the requirement and collected consistently, containerization dramatically reduced rats and cleaned up the streets. Where the rollout was optional, ambiguous, or unenforced, conditions regressed to where they were before. I urge you to close these gaps in M9 and build the fixes into the design before expanding to Brooklyn CD2 and beyond.

Thank you for your work on this program and for the opportunity to comment.

Sincerely,
Katie Overdevest

From: [REDACTED]
To: [NYC Rules \(DSNY\)](#)
Cc: [REDACTED]
Subject: [EXTERNAL] Public Hearing Comments Attached
Date: Monday, June 15, 2026 10:46:38 PM
Attachments: [June 15 2026 To the Department of New York Sanitation.pdf](#)

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Please find letter attached and copy below before deadline June 17th, 2026.

Monday, June 15th, 2026

To the New York City Department of Sanitation:

As long-term residents of Manhattan Community District 9 (M9) with direct experience in the containerization program, we are writing to submit comments on the proposed rule to extend the M9 containerization pilot through October 2027 and expand it into Brooklyn Community District 2.

Our block has participated in the M9 pilot for the past year, and prior to that we participated in the original 10-block shared containerization pilot. Based on our experience, while the program has demonstrated clear benefits, substantial gaps in implementation continue to adversely affect neighborhood quality of life and sanitation services.

What Is Working

- One- to five-family buildings have largely made the transition to containerized waste collection.
- Many buildings with approximately 10 to 50 apartments that have received Empire Bins are in noticeably better condition where the bins are being consistently used.
- During the initial pilot, when collection frequency was highest, there was significantly less visible trash on the streets and fewer rat-related issues.

What Is Not Working

1. Larger buildings on the avenues remain a significant problem.

Buildings located on avenues with bus lanes or commercial parking often have their waste storage facilities at the rear of the property, opening onto side streets rather than the avenue. Several of these buildings still have not received Empire Bins. One example is 569 West 149th Street, located at the corner of Broadway adjacent to Maggie's Garden. In the absence of containerization, this building routinely leaves piles of 20 or more trash bags on the street for multiple days, including directly in front of the community garden. This practice has contributed to a persistent rat infestation and undermines the goals of the pilot program.

2. Non-compliant mid-sized and large buildings continue to leave waste in front of neighboring properties.

This shifts the burden of compliance onto responsible property owners and creates

sanitation issues for surrounding residents and unwarranted enforcement actions.

For example, our building received a DSNY summons in April 2026 for overflowing trash that was ultimately attributable to non-compliant neighboring buildings placing their garbage in front of our property. While we have contested the summons, situations like this impose unnecessary costs, time, and administrative burdens on residents.

3. Collection frequency appears to have declined substantially.

During the original 10-block pilot, daily collection was one of the program's most effective features. Trash did not have the opportunity to accumulate, and rat activity was noticeably reduced.

We were informed by a DSNY employee in 2025 that side-loading trucks serviced only one side of a street at a time. For example, general waste on the north side of West 149th Street was reportedly collected only once per week, while separate trucks serviced the south side. If collection practices have since changed, we would appreciate clarification as to whether the current equipment and staffing levels allow both sides of the street to be serviced daily.

How the Program Can Be Improved

Our overarching recommendation is that DSNY address the existing deficiencies in the pilot before extending or expanding it.

Specifically, we recommend that DSNY:

1. Provide Empire Bins directly to larger buildings rather than relying on owners to opt into the program.
2. Require and facilitate shared Empire Bin arrangements for eligible mid-sized buildings, rather than leaving participation entirely voluntary.
3. Restore daily collection service. Based on our firsthand experience, daily pickup was the single most effective element of the original pilot. Frequent collection prevented trash accumulation, reduced odors, and significantly limited rat activity.

Moreover, the program's current shortcomings should be resolved before it is expanded to additional neighborhoods. Once these deficiencies have been adequately addressed and measurable improvements achieved, DSNY can then evaluate whether further extension and expansion are warranted.

Thank you for your consideration of these comments.

Sincerely,

Abraham and Stephen Sylvia-Roche

A black rectangular redaction box covering the signature of Abraham and Stephen Sylvia-Roche.

From: [REDACTED]
To: [NYC Rules \(DSNY\)](#)
Subject: [EXTERNAL] Relating to Containerization Requirements
Date: Tuesday, May 19, 2026 3:46:54 PM

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Te proposed rules relating to containerization requirements would create a serious risk of injury to our building staff and impose additional expenses on subject buildings.

1)The proposed rule would obligate a subject building to keep an area of the roadway extending 1 1/2 feet from all sides of the container free of snow and ice. This includes the side of the container facing the street. When a DSNY snowplow creates a snowbank against the street side of the container, under the proposed rule a subject building would be obligated to remove the snowbank. My building is on 86th Street between Madison and Fifth Avenues. 86th Street is a busy two-way street used by the 86th Street crosstown bus as well as many trucks, other buses and cars to access the 85th Street transverse to get to the west side. To remove the snowbank our building staff would have to stand in a traffic lane to shovel the snow. So you are asking my building staff to work in the street when a snow storm has made the street slippery. Will the city pay for their hospitalization costs and disability pay when they get injured? Our insurance costs are already unbearable high due to city laws that impose liability on a building when a worker gets injured. Now you are proposing to mandate that we force them to work in traffic lanes on snowy days.

2)As the cost of labor has steadily risen over the past decade, many buildings have reduced their staff to the bare minimum necessary to operate the building efficiently. The proposed rule would impose additional work requirements on an already busy group of people. Why should our building staff be responsible for removing any graffiti put on a container? I assure you our building staff has no particular expertise doing that and it would undoubtedly take a lot of time and effort away from their normal duties. There is a reasonable possibility that we would have to pay significant overtime to our staff to perform the obligations the proposed rule would mandate. The city is already forcing us to pay for containers we did not request in the first place. Now you would impose additional expenses on us relating to the containers.

Respectfully submitted,
Alan Paley

[REDACTED]

From: [REDACTED]
To: [NYC Rules \(DSNY\)](#)
Subject: [EXTERNAL] Testimony
Date: Wednesday, June 17, 2026 4:31:44 PM
Attachments: [260617 Empire Bin BK 2 testimony written.pdf](#)

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Please see attached testimony - I also uploaded on the website
thanks!
Clare

--

Clare Miflin, Executive Director
[Center for Zero Waste Design](#)



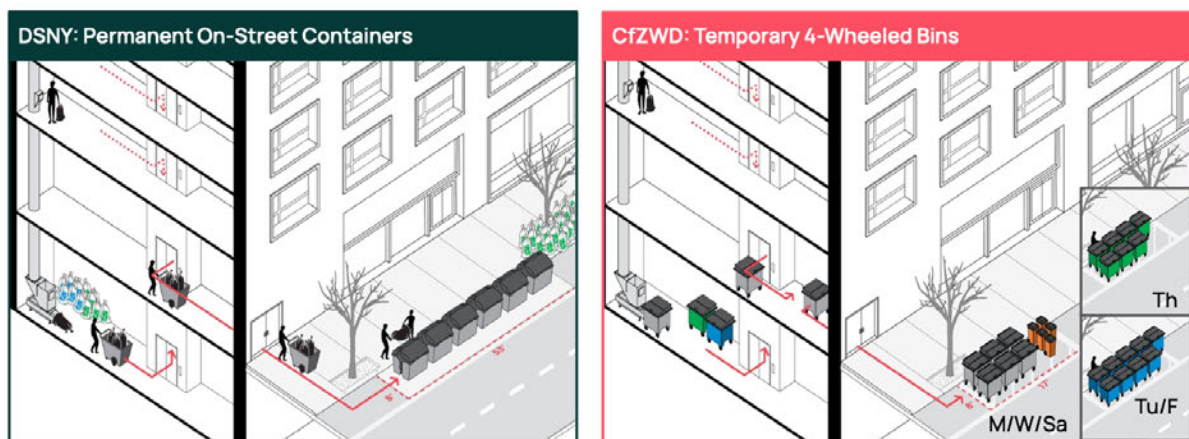
Re: Rules Hearing on DSNY's Containerization Requirements for Buildings Containing 10 or More Dwelling Units

Date: June 17, 2026

I am Clare Miflin, from the [Center for Zero Waste Design](https://centerforzerowastedesign.org), a nonprofit organization that has researched best practices for waste containerization around the world, and advocated for NYC to containerize its waste for a decade.

We are glad that DSNY has chosen to next pilot waste containerization in Brooklyn CB 2, a neighborhood with a very different urban form from CB 9 in Manhattan, and believe it is a great opportunity to pilot alternate methods of waste containerization which would also help reach zero waste goals, improve public space and reduce building operating costs which ultimately are passed onto New Yorkers through rent or maintenance charges. Downtown Brooklyn was upzoned in 2004, and since then has experienced huge growth, with 22,000 new apartments mostly in high rises, and a redesign of the public realm which prioritizes pedestrians, along with many bike lanes and bus lanes. This means that many large new buildings do not have enough curbside space available for the many Empire Bins they would require.

We are glad to see that this rule allows DSNY to determine that certain buildings should use a different set-out method. Buildings need to register by July 31st, DSNY needs to inform them if there is an alternate method of containerization by August 15th, 2026, with implementation by October 15th 2026. This timeline is extremely tight, especially given the coordination with DOT and building owners that would be required to plan and install the 4-wheeled bin pilot that we believe is the best alternative containerization method for this neighborhood. Compared to Empire Bins this solution would take up less space, improve labor, and save costs up to 80%. Curbside space used to stage the 4-wheeled bins could also be used for deliveries later, in a neighborhood with a huge demand for curbside access.



DSNY's Empire Bins compared to the Center for Zero Waste Design's proposed 4-wheeled bin solution for a ~300 unit building. These bins can be attached to existing trash compactors and wheeled directly to the curb for collection.



We recommend that the determination and implementation dates for alternate methods should be extended, and DSNY should start planning alternate method pilots for both small and large buildings. See our website for more on our [recommended pilots](#) and our report [the Hidden Costs of Trash](#), which showed that the average cost for managing waste in buildings is almost \$1000 per apartment per year - costs which could be greatly reduced or eliminated with our recommended pilots. This report was also covered in a [Vital City op-ed](#).

We are very glad that as stated in the rule, DSNY intends to collect more data to be able to evaluate the Empire Bin pilot before rolling out citywide. We urge DSNY to evaluate the pilot, including the alternate methods used, in terms of criteria including:

- Diversion of recycling and compostable waste,
- Number of permanent bins obstructing sidewalks
- Amount of curb lane permanently and temporarily used for waste staging
- Impacts to both building and DSNY labor.

Sharing key performance indicators that will be measured, and the results of the evaluation will help advocacy organizations and New Yorkers support this huge change to the way NYC is collecting waste.

We strongly believe that NYC should plan to containerize waste that doesn't require building staff to lift tons of garbage bags 4' high into Empire Bins every week. Such work is not permissible by health and safety regulations in many countries, and I strongly encourage NYC to design waste systems to phase out the requirement of such backbreaking labor for both DSNY and building staff workers.

The Center for Zero Waste Design is ready and willing to help DSNY ensure that this waste containerization in NYC is as successful and impactful as it can be.

Thank you,

A handwritten signature in black ink that reads "Clare Miflin". The signature is fluid and cursive, with a large initial "C" and a stylized "M".

Clare Miflin
Executive Director
Center for Zero Waste Design

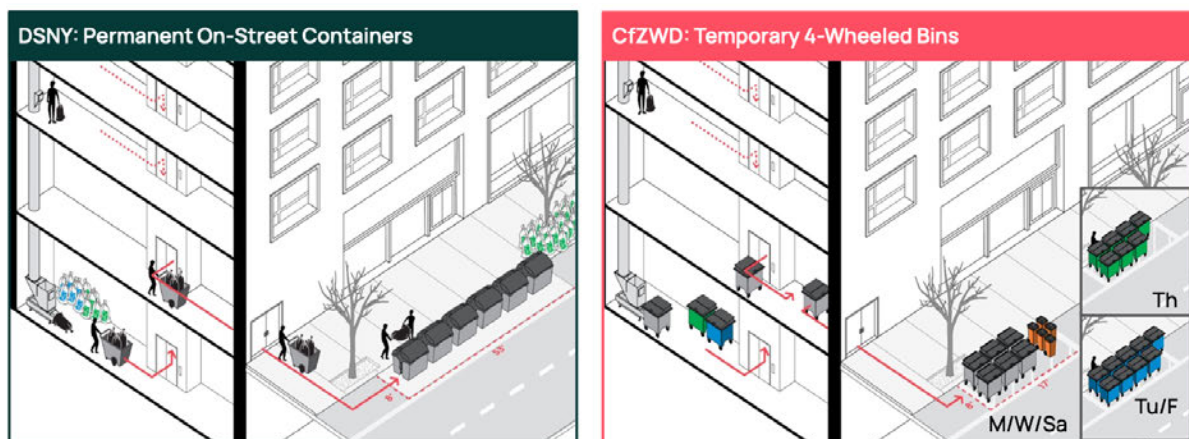
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Date: June 17, 2026

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Thank you,

A handwritten signature in black ink that reads "Clare Miflin". The signature is fluid and cursive, with a large initial "C" and a stylized "M".

Clare Miflin
Executive Director
Center for Zero Waste Design

Name	Date	Comment
Peter Nigrini	5/16/2026 3:57	The Empire Bin containerization program presents the opportunity to significantly improve the public realm. I encourage you to roll it out as quickly and efficiently as possible. I feel lucky to live in a district that is among the first to benefit.
anonymous	5/21/2026 4:24	New York City Department of Sanitation Bureau of Legal Affairs 125 Worth Street, Room 710 New York, NY 10013 Re: Proposed Rules Relating to Containerization Requirements I am submitting these comments regarding the Department of Sanitation’s proposed amendments relating to residential containerization requirements for buildings containing 10 or more dwelling units. Our properties are older mixed use Chinatown buildings containing 16 residential units above ground floor and basement restaurant uses. While we understand the City’s goals relating to rat mitigation and cleaner streets, the proposed rule does not adequately address the physical realities and limitations of many older Lower Manhattan buildings. The proposed rule gives DSNY discretion to determine that a building’s circumstances warrant a different containerization method or alternative set out method. We strongly urge DSNY to explicitly clarify within the final rule that the following conditions constitute valid grounds for alternative set out approval or exemption from standard rigid container requirements: • Lack of lawful interior storage space • Narrow hallways or means of egress that would be obstructed by required containers • FDNY fire safety concerns relating to blocked or narrowed exits • Lack of side yard, rear yard, loading dock, or curb cut • Mixed use buildings where commercial operations already occupy limited service and cellar areas • ADA or pedestrian clearance concerns • Prewar or tenement style building configurations that physically cannot accommodate multiple rigid bins safely Our buildings do not have dedicated trash rooms, loading docks, side yards, or rear access. Interior hallway areas are narrow and function as primary residential egress paths. Requiring large rigid bins to be stored within these common areas may create conflicts with FDNY safety requirements, emergency access, tenant movement, and sanitation handling. In many older Chinatown buildings, cellar access is already heavily utilized by restaurant infrastructure, utility systems, storage, and building operations. These buildings were constructed long before modern containerization mandates and were not designed to accommodate large wheeled bins internally. We respectfully request that DSNY create a formal hardship or alternative compliance pathway for older mixed use multifamily buildings where standard containerization is physically impractical or creates safety concerns. We further request that DSNY specifically recognize “lack of lawful storage space” and “egress obstruction concerns” as explicit qualifying conditions for alternative set out methods. We also encourage DSNY to work collaboratively with FDNY, DOB, and affected property owners before imposing requirements that may unintentionally create unsafe hallway conditions or conflicts with other building regulations. Thank you for the opportunity to comment on this proposed rule.
Shawn	5/23/2026 10:23	I am in complete support of the containerization requirements and the permanent street containers for people to bring their trash to. My neighborhood in Clinton Hill CB2 is completely overrun with rats due to large buildings leaving piles of trash out for hours for rodents to feast on (and which invite non-building residents to dump their trash there too). It’s completely unsanitary and with hantavirus in the news we need to take this much more seriously. The faster this rolls out, the better.

Anonymous	6/8/2026 13:22	I believe clarity and flexibility is needed in any final requirement for use of on-street containers. The arbitrary use of "more than 30 units" lumps in massive buildings that generate large amounts of trash with more modest buildings that can easily use sidewalk containerization. If a moderately sized building that is above 30 units can successfully use sidewalk containerization, they should not be required to use on-street containerization. I urge flexibility to allow this with extenuating circumstances where on-street containers:☐ - do not fit the aesthetic of historic neighborhoods and should be limited to only absolute necessary deployment☐ - cause narrow and unsafe travel routes on narrow streets. On days when opposite side parking is in effect, an on-street container and parked car opposite one another will constrict the street width - we often see this play out when cars park illegally, and fire trucks have great difficulty squeezing through the constricted street.☐ ☐ I fully support containerization with use of approved NYC bins, but I urge a redefinition of "large" to be above 60 dwelling units, or an addition of another tier to distinguish between building sizes that provides more flexibility below 60 dwelling units, and accommodation for historic neighborhoods and streets that are defined as "narrow."
Anonymous	6/15/2026 21:08	I fully support containerization, and hope that the project continues and is codified moving forward. Overall, I find the containerization to be a great success. I find the bins to be a much better use of the street than free & subsidized parking for the small percentage of NY'rs that own cars. There is a noticeable downturn of rats on the block. As a pilot block we initially had flap top dumpsters, and that was the best option. By lowering the barrier of entry into the idea & making disposal as simple as possible, the block was the cleanest it had ever been with no additional measures taken. They also held the largest amount of trash. While I understand that the empire bins are what has been decided on, what has been created is a multistep process that could be improved. The bins are only opened by building supervisors, so tenants must first place trash else where to then be collected in the bins. This often still leaves trash out. Additionally the bins seem to have several mechanisms that break, including the tops and push bar. They also don't have the capacity the original containers had, often causing trash to be placed back on the street when the bins are full. I fully support large scale containerization, in any form we can get but I do see room for improvement and hope if we're going to do it, we can do it right the first time.
Raphael	6/15/2026 22:02	To the Department of Sanitation, I am writing in support of the city's containerization effort, and specifically to comment on the proposed extension of the Manhattan Community District 9 pilot through October 2027 and its expansion into Brooklyn Community District 2. I live in M9, and my block has been part of both the original 10-block shared containerization pilot and the current M9 pilot. I want to be clear: I believe containerization works. When shared bins were first introduced on our block, rat sightings dropped significantly. The improvement was real. I am writing because I want the broader rollout to succeed, and our experience has shown that the program needs stronger consistency, clearer rules, and better enforcement before it expands. Over the past year, rat sightings on our block have increased again. From what I have observed, the problem is not containerization itself. The problem is that the rollout left gaps: some buildings were covered, others were not; some rules were clear, others were not; and enforcement has not been consistent enough to keep buildings compliant. My block includes townhomes, small apartment buildings, mid-sized buildings, and larger buildings, so it offers a useful example of the challenges the city will face as this program expands. The townhomes have mostly adapted well. Large buildings with Empire Bins are generally in better shape when those bins are actually used. But mid-sized buildings and some large buildings have fallen through the cracks. I urge DSNY to address the following before expanding the program further: First, please do not leave mid-sized buildings in limbo. Buildings with roughly 10 to 30 units need a clear containerization solution. Relying on owners to opt in has created confusion, especially because owners are often not the people handling the trash day to day. Supers are. Larger buildings should receive Empire Bins directly, and mid-sized buildings should be allowed to share Empire Bins where appropriate. Second, please address large buildings that front an avenue but set out trash on the side street. Several larger buildings near us appear to have been missed because their main address is on an avenue, even though their trash is placed on 149th Street. Without containers, these buildings have gone back to setting out bags, and the rats have returned. This is exactly the kind of gap that undermines the program. Third, please clarify the actual bin requirement and timeline. Residents have been told to use official DSNY bins, but in practice many different bins are still being used, and the new truck system does not appear to be fully in place. The city needs to make the rules and implementation schedule much clearer. Fourth, please enforce against bad trash storage. On some properties, trash is still left in chewed-through plastic bins or piled beside overflowing bins. Even when an Empire Bin exists nearby, it is not always being used consistently. If trash is still accessible to rats, the program cannot achieve its purpose. Fifth, please bring back the kind of consistent enforcement that made the original pilot work. During the first 10-block pilot, conditions were documented regularly, including with photos, and that accountability mattered. Buildings that allow garbage to pile up should be ticketed. Without enforcement, the responsible buildings carry the burden while the problem buildings continue to attract rats. Finally, I strongly urge DSNY to restore daily pickup for shared containers. In the original pilot, daily collection was one of the biggest reasons the program worked. Trash did not sit long enough to become a food source. Daily pickup, combined with shared Empire Bins for mid-sized buildings, would solve many of the capacity and coverage problems we are seeing now. The issue is not whether containerization works. It does. The issue is whether the city can implement it consistently. Where bins are available, used properly, collected regularly, and backed by enforcement, the streets are cleaner and rat activity goes down. Where the rollout is optional, unclear, or unenforced, the conditions regress. I urge DSNY to fix these problems in M9 before expanding the program to Brooklyn CD2 and beyond. The city has a real opportunity here, but the success of the rollout depends on closing the gaps we have already seen firsthand. Thank you for your work on this program and for the opportunity to comment. Sincerely, Raphael Sbarge

Michael Jameson	6/15/2026 23:24	The container program must be expanded to buildings with less than 10 units. I live in a townhouse with three units. My neighbors in comparable 3- and 4- unit buildings say they would eagerly participate. An earlier iteration of the pilot allowed this because the containers were not locked. Currently, we are forced to use and manage individual cans on rollers that must be moved up and down stoops on collection days and are subject to theftâ€”an extremely cumbersome and inefficient, privatized scheme. Let all of us opt in to use the containers! They have most definitely reduced the visible rat population.
Emory	6/16/2026 10:17	First the required trash can are not good, the rats have eaten through the ones I've purchased. The street bens , people just leave garbage out and around them anytime oof day and it makes it hard to police them. We are being ticked for that. Getting new cards is hard to do and where do we get them from? Not sure if the city is still waiting for rats in our neighborhood. But the getting of new cards is a problem we now have only 1 card 562 W 149 St district 9.
Clare Miflin, Center for Zero Waste Design	6/17/2026 16:23	The Center for Zero Waste Design is a nonprofit organization that has researched best practices for waste containerization around the world, and advocated for NYC to containerize its waste for a decade. ☐ We are glad that DSNY has chosen to next pilot waste containerization in Brooklyn CB 2, a neighborhood with a very different urban form from CB 9 in Manhattan, and believe it is a great opportunity to pilot alternate methods of waste containerization which would also help reach zero waste goals, improve public space and reduce building operating costs which ultimately are passed onto New Yorkers through rent or maintenance charges. Downtown Brooklyn was upzoned in 2004, and since then has experienced huge growth, with 22,000 new apartments mostly in high rises, and a redesign of the public realm which prioritizes pedestrians, along with many bike lanes and bus lanes. This means that many large new buildings do not have enough curbside space available for the many Empire Bins they would require. ☐ We are glad to see that this rule allows DSNY to determine that certain buildings should use a different set-out method. Buildings need to register by July 31st, DSNY needs to inform them if there is an alternate method of containerization by August 15th, 2026, with implementation by October 15th 2026. This timeline is extremely tight, especially given the coordination with DOT and building owners that would be required to plan and install the 4-wheeled bin pilot that we believe is the best alternative containerization method for this neighborhood. Compared to Empire Bins this solution would take up less space, improve labor, and save costs up to 80%. Curbside space used to stage the 4-wheeled bins could also be used for deliveries later, in a neighborhood with a huge demand for curbside access. ☐ We recommend that the determination and implementation dates for alternate methods should be extended, and DSNY should start planning alternate method pilots for both small and large buildings. See our website for more on our recommended pilots and our report the Hidden Costs of Trash, which showed that the average cost for managing waste in buildings is almost \$1000 per apartment per year - costs which could be greatly reduced or eliminated with our recommended pilots. This report was also covered in a Vital City op-ed.☐ We are very glad that as stated in the rule, DSNY intends to collect more data to be able to evaluate the Empire Bin pilot before rolling out citywide. We urge DSNY to evaluate the pilot, including the alternate methods used, in terms of criteria including:☐ - Diversion of recycling and compostable waste, ☐ - Number of permanent bins obstructing sidewalks☐ - Amount of curb lane permanently and temporarily used for waste staging☐ - Impacts to both building and DSNY labor.☐ Sharing key performance indicators that will be measured, and the results of the evaluation will help advocacy organizations and New Yorkers support this huge change to the way NYC is collecting waste.☐ We strongly believe that NYC should plan to containerize waste that doesnâ€™t require building staff to lift tons of garbage bags 4â€™ high into Empire Bins every week. Such work is not permissible by health and safety regulations in many countries, and I strongly encourage NYC to design waste systems to phase out the requirement of such backbreaking labor for both DSNY and building staff workers. ☐ The Center for Zero Waste Design is ready and willing to help DSNY ensure that this waste containerization in NYC is as successful and impactful as it can be. ☐ See attached testimony, and more on our website: https://centerforzerowastedesign.org/all/advocacy/containerization-pilot-proposals/
Rebecca Poole	6/17/2026 19:50	Please see attached comments.



Council of New York Cooperatives & Condominiums

INFORMATION, EDUCATION AND ADVOCACY

850 7th Avenue, Suite 1103 | New York, NY 10019 | (212) 496-7400 | www.CNYC.coop

COMMENTS ON PROPOSED RULES

Containerization Requirements for Buildings Containing 10 or More Dwelling Units

June 17, 2026

The Council of New York Cooperatives & Condominiums (CNYC Inc) is a member-funded not-for-profit organization providing information, education and advocacy to and for cooperatives and condominiums in the five boroughs and beyond for over 50 years. Homeowners in CNYC's member buildings span the full economic spectrum. They self-fund the preservation of their buildings, ensure the ongoing availability of an affordable homeownership option in New York City, and are fully vested in their communities.

The means in which the containerization program is being implemented shifts the costs of a service that benefits all of New York City by reducing vermin onto co-op and condo homeowners. While resident-homeowners in 1-2 family homes are able to obtain NYC Bins for free, all co-op and condo resident-homeowners are required to pay for theirs; In the case of large buildings, the charge is an ongoing annual fee of up to \$55 per month.

From the introduction of the legislation, CNYC has expressed concerns not just about the new fees, but also regarding the strain containerization might place on building staff members. Instead of setting out clear instructions regarding the protective gear that might be required for building staff members in large buildings, the rules now require co-op and condo board members in pilot neighborhoods to determine what "is reasonably necessary for such purpose." Given the department of sanitation's experience with providing gear to their employees, CNYC requests more guidance be provided.

CNYC is further concerned with the new snow and ice removal requirements. While building employees clear snow and ice from sidewalks, requiring them to now clear snow and ice 18" past the on-street containers into the roadway adds to their workload, increases the labor costs faced by each building, and potentially places these employees at risk, particularly for buildings on busy streets. Clearing snow and ice around the containers may require staff to work in confined areas, near traffic, or around heavy equipment, increasing the likelihood of slips, falls, strains, and other workplace injuries. For co-ops and condos with one employee, this creates an additional burden. CNYC respectfully requests that the department of sanitation find another method of removing snow and ice from around the containers.

Finally, CNYC would be interested in having a study done in the pilot areas on (1) the change in workers compensation and disability claims received by the department of sanitation, (2) the change in the time required for pick-up routes, and (3) the change in workers compensation and

disability claims among building service employees working for large buildings with containers. This information could be used to create a more complete picture of the costs and savings of the containerization program, both for the city and co-op and condo homeowners.

Thank you for your consideration.

From: [REDACTED]
To: [NYC Rules \(DSNY\)](#)
Cc: [REDACTED]
Subject: DSNY Proposed Rule Relating to Containerization Requirements for Buildings Containing 10 or More Dwelling Units
Date: Friday, May 15, 2026 12:02:23 PM

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

To Whom It May Concern:

I write regarding the Department of Sanitation's proposed amendments relating to containerization requirements for residential buildings with 10 or more dwelling units.

Let me begin by stating clearly that I support the goals of cleaner streets, improved quality of life, and meaningful rat reduction efforts throughout New York City. Thoughtful containerization policies can play an important role in achieving those objectives. However, as a member of the New York City Council representing Staten Island's South Shore, I also believe strongly that successful public policy requires competent implementation, fairness, transparency, and flexibility.

Unfortunately, the rollout of the city's official trash bin program has left many New Yorkers frustrated and skeptical. My office has heard from numerous constituents who paid for bins that were delayed for months or not delivered at all, often with little communication or certainty about refunds, fulfillment, or enforcement timelines. Many of these residents were understandably concerned that they could face penalties for failing to comply with requirements despite not having received the products they purchased.

For that reason, I urge the Department to proceed cautiously before expanding or institutionalizing additional containerization mandates and enforcement mechanisms.

Specifically, I respectfully urge the Department to consider the following recommendations: First, no expansion of enforcement activity should occur until the Department can certify that all previously ordered bins have been delivered or refunded and that there is a stable, accessible supply chain for future purchases.

Second, the Department should incorporate cure periods before penalties are imposed. The proposed rule explicitly states that no cure period will be provided because violations are deemed to pose public health or safety risks. While cleanliness and public health are important priorities, many violations are likely to stem from confusion, logistical challenges, weather conditions, or vendor-related problems rather than willful misconduct. Property owners should be given notice and an opportunity to correct issues before being fined.

Third, the Department should recognize that different boroughs and neighborhoods have fundamentally different built environments. The current pilot areas consist of dense sections of Manhattan and Brooklyn. Staten Island neighborhoods, particularly on the South Shore, feature lower-density development patterns, narrower residential streets, different curb usage patterns, and significantly different sanitation logistics. A one-size-fits-all approach may not

be appropriate citywide.

Fourth, the Department should provide greater clarity regarding maintenance obligations and liability standards associated with stationary on-street containers, particularly with respect to snow removal, vandalism, graffiti, and surrounding roadway maintenance requirements.

Property owners should not be subjected to unreasonable liability or enforcement exposure for conditions beyond their control.

Finally, I encourage the Department to continue engaging directly with residents, civic associations, elected officials, and property owners throughout this process. Public confidence in sanitation reforms depends not only on the policy itself, but on whether residents believe the program is being administered fairly and competently.

Thank you for considering these comments and for your continued work to improve sanitation services throughout New York City.

Sincerely,

Frank Morano

Council Member, 51st District

New York City Council

Frank Morano

New York City Councilman, 51st District (Staten Island)

Chair, Veterans Committee

Co-Chair, Common Sense Caucus | Italian Caucus

Office: 718-984-5151

Katie Overdevest

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

June 11, 2026

DSNY - Bureau of Legal Affairs
125 Worth Street Room
Floor: 710
New York, New York 10013

To the Department of Sanitation,

I am writing to submit public comment on the proposed rule to extend the Manhattan Community District 9 (M9) containerization pilot through October 2027 and expand it into Brooklyn Community District 2.

I write as a resident of M9 with direct experience of the program. My block has been part of the M9 pilot for the past year, and prior to that we participated in the original 10-block shared containerization pilot. I want to be clear up front: I am a strong supporter of containerization. When we moved to shared bins, rat sightings on our block dropped significantly. The program works. I am writing because I want the citywide rollout to succeed, and the M9 experience has surfaced specific, fixable problems that the city should address before expanding.

Over the past year, rat sightings on my block have climbed again. Based on my own observations and conversations with building superintendents, the rollout left meaningful gaps in coverage, enforcement, and clarity. My block is a good cross-section of building types — townhomes, small apartment buildings, mid-sized buildings, and large buildings — so the issues below reflect the full range of what the program will encounter elsewhere.

What is working: Townhomes have largely made the switch. There are still occasional stray bags, but in general the smallest buildings are using their bins. Large buildings that received Empire Bins are generally in good shape where the bins are actually being used.

Issues that should be addressed:

1. Don't leave mid-sized buildings (10–30 units) in limbo, and don't rely on owners to opt in. The "choice" between Empire Bins and individual bins was a failure in practice, and the application process broke down even for larger buildings. One superintendent on my block services 557, 559, and 561 W 149th St — a 60-unit complex in total. His owner never applied for an Empire Bin, so early in the pilot he was left without one despite being well above the 31+ unit threshold. He eventually procured a bin a few weeks later, but only because neighbors stepped in to help. The combination of unit-based restrictions and an opt-in application process created real confusion at the outset, and the disconnect between owners (who make the application decision) and supers (who handle the trash daily) left coverage gaps. My recommendation: give larger buildings Empire Bins directly rather than relying on owners to apply, and allow mid-sized buildings to share Empire Bins, rather than leaving the decision optional.

2. Address large buildings that front an avenue but set out trash on the side street. Buildings situated on avenues with bus lanes or commercial parking often have their trash facilities at the back, opening onto the side street rather than the avenue — and several of these did not receive Empire Bins. For example, the large building at 1800 Amsterdam Ave (also addressed 501 W 149th St) has no Empire Bins. The same is true at 3612 Broadway and 3610 Broadway, both large buildings whose trash empties onto 149th Street. With no containers, these buildings have gone back to bagging trash the old way. In one case, a building near 503 W 149th St has been stacking bags in front of an empty townhome at 505 W 149th St. The result is that you cannot walk down 149th Street anymore without encountering rats. This was solved during containerization and has regressed purely due to coverage gaps.
3. Clarify the bin requirement. As of June 1, residents were told they were required to use an official DSNY bin, but in practice people are still using a wide variety of bins and the side-loading trucks clearly are not yet in service for them. This sends a mixed signal. Please make the actual requirement and timeline unambiguous.
4. Enforce against bad trash storage. Many large buildings line chewed-through plastic bins against the building. When those bins fill, tenants leave trash beside them, and the rats remain well fed. An Empire Bin on site does not guarantee the supers are using it daily; often they consolidate trash and only later move it to the Empire Bin, leaving overflowing plastic bins in the meantime. See 551 W 149th St, where plastic bins overflow daily, and 503 W 149th St, where you can see four to five rats on top of the bins most nights.
5. Restore consistent enforcement and ticketing. During the original 10-block pilot, DSNY documented conditions with photos twice a day, and that accountability is what made the program work. Please resume the photo-based enforcement that was effective in the first pilot and actually ticket non-compliant buildings.
6. Bring back daily pickup, especially if mid-sized buildings could share Empire Bins. The single biggest difference-maker during the 10-block pilot was daily collection — trash never had time to accumulate or attract rats. I strongly urge you to empty Empire Bins daily, and to allow mid-sized buildings to share Empire Bins rather than leaving them with individual bins. Combining daily pickup with shared Empire Bins for mid-sized buildings would solve both the capacity problem and the coverage gaps at once, and it is the change most likely to keep rat populations down as the program scales.

The throughline across all of these is accountability and consistency. Where the city held building owners and supers to the requirement and collected consistently, containerization dramatically reduced rats and cleaned up the streets. Where the rollout was optional, ambiguous, or unenforced, conditions regressed to where they were before. I urge you to close these gaps in M9 and build the fixes into the design before expanding to Brooklyn CD2 and beyond.

Thank you for your work on this program and for the opportunity to comment.

Sincerely,
Katie Overdevest

Monday, June 15th, 2026

To the New York City Department of Sanitation:

As long-term residents of Manhattan Community District 9 (M9) with direct experience in the containerization program, we are writing to submit comments on the proposed rule to extend the M9 containerization pilot through October 2027 and expand it into Brooklyn Community District 2. Our block has participated in the M9 pilot for the past year, and prior to that we participated in the original 10-block shared containerization pilot. Based on our experience, while the program has demonstrated clear benefits, substantial gaps in implementation continue to adversely affect neighborhood quality of life and sanitation services.

What Is Working

- One- to five-family buildings have largely made the transition to containerized waste collection.
- Many buildings with approximately 10 to 50 apartments that have received Empire Bins are in noticeably better condition where the bins are being consistently used.
- During the initial pilot, when collection frequency was highest, there was significantly less visible trash on the streets and fewer rat-related issues.

What Is Not Working

1. Larger buildings on the avenues remain a significant problem.

Buildings located on avenues with bus lanes or commercial parking often have their waste storage facilities at the rear of the property, opening onto side streets rather than the avenue. Several of these buildings still have not received Empire Bins.

One example is 569 West 149th Street, located at the corner of Broadway adjacent to Maggie's Garden. In the absence of containerization, this building routinely leaves piles of 20 or more trash bags on the street for multiple days, including directly in front of the community garden. This practice has contributed to a persistent rat infestation and undermines the goals of the pilot program.

2. Non-compliant mid-sized and large buildings continue to leave waste in front of neighboring properties.

This shifts the burden of compliance onto responsible property owners and creates sanitation issues for surrounding residents and unwarranted enforcement actions.

For example, our building received a DSNY summons in April 2026 for overflowing trash that was ultimately attributable to non-compliant neighboring buildings placing their garbage in front of our property. While we have contested the summons, situations like this impose unnecessary costs, time, and administrative burdens on residents.

3. Collection frequency appears to have declined substantially.

During the original 10-block pilot, daily collection was one of the program's most effective features. Trash did not have the opportunity to accumulate, and rat activity was noticeably reduced.

We were informed by a DSNY employee in 2025 that side-loading trucks serviced only one side of a street at a time. For example, general waste on the north side of West 149th Street was

reportedly collected only once per week, while separate trucks serviced the south side. If collection practices have since changed, we would appreciate clarification as to whether the current equipment and staffing levels allow both sides of the street to be serviced daily.

How the Program Can Be Improved

Our overarching recommendation is that DSNY address the existing deficiencies in the pilot before extending or expanding it.

Specifically, we recommend that DSNY:

1. Provide Empire Bins directly to larger buildings rather than relying on owners to opt into the program.
2. Require and facilitate shared Empire Bin arrangements for eligible mid-sized buildings, rather than leaving participation entirely voluntary.
3. Restore daily collection service. Based on our firsthand experience, daily pickup was the single most effective element of the original pilot. Frequent collection prevented trash accumulation, reduced odors, and significantly limited rat activity.

Moreover, the program's current shortcomings should be resolved before it is expanded to additional neighborhoods. Once these deficiencies have been adequately addressed and measurable improvements achieved, DSNY can then evaluate whether further extension and expansion are warranted.

Thank you for your consideration of these comments.

Sincerely,

Abraham and Stephen Sylvia-Roche

A black rectangular redaction box covering the signature of Abraham and Stephen Sylvia-Roche.



**Testimony of Alia Soomro, Deputy Director for New York City Policy
New York League of Conservation Voters
New York City Department of Sanitation
DSNY Proposed Rules on Containerization Requirements for
Buildings Containing 10 or More Dwelling Units
June 17, 2026**

My name is Alia Soomro and I am the Deputy Director for New York City Policy at the New York League of Conservation Voters (NYLCV). NYLCV is a statewide environmental advocacy organization representing over 30,000 members in New York City. Thank you for the opportunity to comment.

NYLCV supports DSNY's waste containerization efforts since it will not only reduce litter on the ground, the mounds of plastic trash bags on our sidewalks, and the rat population but increase waste diversion. Waste containerization also has the potential to revitalize our City's public realm for public use if designed well. We strongly support the Mamdani Administration's [recent announcement](#) of six new districts to be containerized by the end of 2027, with at least one fully containerized district in each borough, and committing to fully citywide trash containerization by the end of 2031.

NYLCV also supports DSNY's proposed rule, which would amend and expand DSNY's stationary on-street container pilot program to include an additional area and to extend containerization requirements for both large residential buildings that contain 31 or more residential dwelling units, and medium residential buildings that contain 10 to 30 residential dwelling units. The City Council passed [Local Law 180 of 2025](#), a [NYLCV 2025 Scorecard bill](#), which authorizes the Department to expand this program and gives the Department additional authority to promulgate rules related to containerization and the use of stationary on-street containers.

Going forward, the City will also need long-term capital funding for Automated Side-Loading Trucks and more Empire Bins. These bins, which are made in Spain, sit at the curb, can only be opened by building staff or sanitation workers with special electronic keycards issued by the city, and are emptied by [new \\$500,000-a-piece garbage trucks](#) purchased by DSNY that are equipped with lifts.

When it comes to commercial waste containerization, we support the recommendations outlined in the Center for Zero Waste Design's new report, [Curb Alert!: Reimagining commercial waste containerization to better support small businesses in NYC](#). This report looks at commercial waste containerization, particularly for small businesses as DSNY rolls out Commercial Waste

Zones. Consolidating waste bins on commercial corridors in the roadway, rather than on sidewalks, would enable business owners to maintain cleaner storefronts and better separate recycling and compostable waste, which is vital if we want to meet our zero waste by 2030 goal. It will also improve the public realm, ease pick-up from haulers, and improve waste diversion in Commercial Waste Zones. We hope DSNY will consider ways to plan for waste containerization as it rolls out more Commercial Waste Zones throughout the city.

We must invest and improve our streetscapes while working toward our City's zero waste by 2030 mandate to reduce the amount of waste sent to landfills. Getting trash off the sidewalk creates more opportunities for the beneficial use of public space such as bioswales, trees, bike corrals, sidewalk seating, bus shelters, delivery microhubs, and pedestrian plazas. We look forward to working with DSNY to reduce our waste output and improve quality of life.

Thank you for the opportunity to comment.