



**Testimony of Alia Soomro, Deputy Director for New York City Policy
New York League of Conservation Voters
New York City Department of Sanitation
DSNY Proposed Implementation Dates for Brooklyn North and Upper Manhattan
Commercial Waste Zones
May 8, 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 strongly supported the passage of Local Law 199 of 2019, establishing the City's first Commercial Waste Zones (CWZ) program. Championed by a wide group of stakeholders, this law overhauls the City's antiquated and inefficient commercial waste management system by dividing the City into 20 zones, limiting each zone to a maximum of three of private sanitation companies and five carters to provide containerized commercial waste collection services from dumpsters and compactors citywide, all selected through a competitive bid process (awardees). The resulting contracts with the awardees include standards for pricing, customer service, safety, environmental health, and requirements to promote the City's commitment to recycling and sustainability.

NYLCV supports DSNY's proposed rules for the implementation start date and final implementation date for the next two CWZs: Brooklyn North and Upper Manhattan, both starting on October 1, 2026. We also recommend that DSNY release an implementation timeline for the entire CWZs system by the end of 2026. We hope the City will dedicate the requisite amount of resources and funding for staffing, education, and outreach to fully implement the CWZ law.

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

Lastly, we urge the next Administration to work with the City Council in expanding commercial organics separation requirements to all food businesses by the end of 2026.

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

Thank you for the opportunity to comment.

NYLPI

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**Comments of Justin Wood, Director of Policy of
New York Lawyers for the Public Interest
to the Department of Sanitation on May 8, 2026
Regarding the Proposed Rule Regarding Commercial Waste Zones in
Brooklyn North and Upper Manhattan**

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

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

Following the implementation of the first five zones, we are supportive of DSNY's proposal to move forward with additional zones for a total of ten zones by November 30, 2026.

2. The rollout of new zones should emphasize commercial waste diversion strategies and support for small business customers.

The Commercial Waste Zones Annual Report published in October, 2025 included the first real-world data on VMT, quantities of waste collected for disposal and recycling, and safety violations. Consistent with prior estimates, only 26% of commercial waste collected in the first waste zone in Central Queens was separated for recycling and composting in the first phase of the new collection system, meaning that more than 74% is being trucked to landfills and incinerators.

DSNY now plans for half of the city's 20 zones to be implemented by December, 2026. We urge the Department to focus on commercial waste diversion in conjunction with this citywide transition to a more transparent and efficient collection system.

Reducing, donating, and recycling more of the vast quantities of waste generated by New York City's diverse businesses is one of the simplest and most immediate pathways to reduce greenhouse gas emissions, lower the high costs of New York City's solid waste disposal system, and to make progress toward the City and State's zero waste and climate goals.

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

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

We also urge DSNY to ensure that CWZ implementation spurs the waste industry to accelerate the major investments needed in organics recycling facilities, modern trucks, customer service infrastructure, and community-level services to achieve the goals of Local Law 199, the Zero Waste Act and the New York State Climate Leadership and Community Protection Act (CLCPA).

3. New zones create opportunities to advance environmental justice by utilizing public infrastructure.

We continue to stress that throughout the City, commercial haulers could operate more efficient collection routes and reduce fuel, tolls, and labor costs by utilizing municipal marine and rail transfer stations instead of crossing boroughs, bridges, and tunnels dump at private transfer stations in outer borough environmental justice communities.

DSNY's state-of-the art facilities were designed to accept commercial waste during overnight hours as part of the current Solid Waste Management Plan (SWMP). We urge DSNY to expedite a study of the competitive price and any subsidies necessary to incentivize haulers to use this facility as envisioned in the SWMP, and to partner with Manhattan awardees to pilot commercial use of the MTS as soon as possible.

4. Increase Transparency as the CWZ Program Expands.

The CWZ system is generating unprecedented data on collection routes, driving practices, and the quantities and types of waste being collected, recycled, and disposed by the commercial system. As implementation continues, we urge the Department to publish and regularly update a CWZ data dashboard to evaluate progress toward the goals of Local Law 199 in each zone and citywide.

The public, customers, and various CWZ stakeholders should also be able to access each awardee's waste diversion plans, customer education plans, VMT reduction plans, prices, and the names and qualifications of all subcontractors, transfer stations, recycling facilities, and micro-haulers that the designated haulers intend to utilize to service the zone.

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

Sincerely,

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For 50 years, NYLPI has fought to protect civil rights and achieve lived equality for communities in need. Led by community priorities, we pursue health, immigrant, disability, and environmental justice. NYLPI combines the power of law, organizing, and the private bar to make lasting change where it's needed most. Our Environmental Justice Program works to eliminate the unfair burden of environmental hazards borne by low-income communities and communities of color and seeks to create a more equitable and sustainable city.

For more information visit: www.nylpi.org

Online comments: 1

**Jessica
Walker,
Manhattan
Chamber of
Commerce**

May 8, 2026

Bureau of Legal Affairs
New York City Department of Sanitation
125 Worth Street, Room 710
New York, NY 10013

Re: Proposed Rule — Implementation Dates for the Brooklyn
North and Upper Manhattan Commercial Waste Zones

To Whom It May Concern:

The Manhattan Chamber of Commerce represents 125,000 Manhattan businesses, including thousands operating within the boundaries of the proposed Upper Manhattan Commercial Waste Zone. We appreciate the opportunity to comment on the Department's proposed implementation schedule.

The Chamber takes no position on the proposed October 1, 2026 implementation start date or November 30, 2026 final implementation date for Upper Manhattan. The 60-day transition window is consistent with the schedules DSNY adopted for prior zones, and we recognize that Local Law 199 vests implementation timing in the Department's discretion. Our comments focus instead on what Upper Manhattan businesses will need during that window — and on what DSNY can do between now and October 1 to make the transition as orderly as possible.

1. Apply lessons from Lower Manhattan before Upper Manhattan begins. Lower Manhattan reaches final implementation on May 31, 2026. By October 1, the Department will have approximately four months of post-rollout operational data from the zone most directly comparable to Upper

Manhattan. We urge DSNY to publish a public after-action assessment of the Lower Manhattan transition before the Upper Manhattan implementation start date, covering at minimum: the share of businesses successfully migrated to awardee service; categories and volume of complaints received; pricing and service-level performance relative to RFP commitments; and operational issues identified by awardees, businesses, or the Department. This information is essential not only for Upper Manhattan but for the ten remaining zones still to be scheduled.

2. Strengthen business-facing communications and education during the transition. The clearest predictor of a smooth rollout is whether businesses understand what is changing, when, and what they must do. We ask the Department to commit to: a multilingual outreach campaign in the Upper Manhattan zone beginning no later than July 2026; clear awardee identification materials so businesses can verify legitimate carter outreach and avoid misrepresentation by non-awardees; and a dedicated DSNY contact channel — staffed in real time throughout the transition window — for businesses experiencing service disruptions, billing disputes, or carter assignment questions.

3. Pricing transparency for businesses moving to awardee service. The CWZ contracts include pricing standards intended to protect businesses. We ask that the Department make Upper Manhattan businesses' applicable contracted rates and protections readily accessible during the transition, so members can confirm they are being billed consistently with awardee obligations. Businesses moving from longstanding carter relationships to new awardees need a straightforward way to verify they are paying what the contract requires.

The Manhattan Chamber of Commerce stands ready to partner with DSNY on member education and outreach in advance of the Upper Manhattan rollout. We can convene members through our regular programming, distribute Department-developed materials through our communications channels, and host briefings with awardees and DSNY staff throughout the summer. We welcome the opportunity to discuss this work further.

Thank you for the opportunity to comment.

Sincerely,

Jessica Walker
President & CEO
Manhattan Chamber of Commerce

Comment added May 8, 2026 11:43am