



sanitation

**~~DRAFT~~FINAL SCOPE OF WORK
FOR A
DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR THE
CITYWIDE CONTAINERIZATION PROGRAM**

CEQR 25DOS003Y

~~September 17, 2025~~
July 1, 2026

CITY OF NEW YORK DEPARTMENT OF SANITATION

**~~JAVIER LOJAN, ACTING COMMISSIONER~~
GREGORY ANDERSON, COMMISSIONER**

www.nyc.gov/sanitation

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~~Draft~~Final Scope of Work for a Draft Environmental Impact

Statement for the Citywide Containerization Program

1 INTRODUCTION

The New York City Department of Sanitation (DSNY) proposes to implement a stationary on-street container ~~waste containerization~~ program to containerize waste at certain buildings with residential units ~~and schools~~ throughout the five (5) boroughs of New York City and schools in Manhattan Community District (CD) 09 and Brooklyn CD 02 (Citywide Containerization Program or Proposed Program).

As discussed in further detail below, under the proposed Citywide Containerization Program, buildings with 10 to 30 residential units would have the option to use stationary on-street containers or individual bins consisting of rigid receptacles with tight-fitting lids not exceeding 55 gallons in size for their refuse; buildings with 31 or more residential units would use stationary on-street containers for their refuse; and schools in Manhattan CD 09 and Brooklyn CD 02 that receive DSNY collection would use stationary on-street containers for all waste streams (refuse; organics; metals, glass, ~~and plastic, and cartons~~ [MGPC]; and paper/cardboard~~recyclables~~). The Proposed Program would be advanced throughout the City in phases, with full implementation by June 1, 2032. The Proposed Program would support the City's commitment to improving street cleanliness and reducing potential food sources for vectors.¹ These changes align with other City initiatives to increase the use of containers for waste storage and collection, and to create cleaner, more livable, and more vibrant streets and neighborhoods across the City.

The Proposed Program will be reviewed for its potential environmental impacts, in accordance with the State Environmental Quality Review Act (SEQRA) and the City Environmental Quality Review (CEQR) procedures. Implementation of the proposed Citywide Containerization Program would involve a discretionary action and local approvals and is therefore subject to CEQR and SEQRA and their implementing regulations. The City entities that may potentially be involved in the environmental review and approval process for the Proposed Program are:

- DSNY acting as lead agency for the environmental review for the Citywide Containerization Program implementation; and
- Consultations with several City agencies:
 - New York City Department of Transportation (NYCDOT);
 - New York City Department of Environmental Protection (NYCDEP);
 - New York City Landmarks Preservation Commission (NYCLPC); ~~and~~
 - New York State Historic Preservation Office (SHPO); and
 - Metropolitan Transportation Authority (MTA) New York City Transit (NYCT).
 - ~~New York City Public Design Commission (NYCPDC).~~

As lead agency for the Proposed Program, DSNY will be preparing a Draft Environmental Impact Statement (DEIS) to examine the potential for significant adverse environmental impacts that

¹ Vector means a carrier organism that is capable of transmitting a pathogen to another organism and includes, but is not limited to, flies and other insects, rodents, birds, and vermin. 6 NYCRR 360.2(b)(315).

could occur as a result of the implementation of the Citywide Containerization Program. DSNY will release the DEIS for public review and comment, as well as consideration by other involved and interested agencies and stakeholders when it is completed. This ~~Draft~~Final Scope of Work describes the proposed action, its purpose and need, and the environmental review process. It also identifies the analytical framework to be used in the DEIS and presents the analyses and work items to be undertaken for the DEIS.

DSNY ~~requests~~requested public comments on ~~this~~the Draft Scope of Work. A Public Scoping meeting to receive such comments on ~~this~~the Draft Scope of Work ~~has been scheduled for~~was held on October 20, 2025 via Microsoft Teams from 9:00 AM to 12:00 PM and 1:00 PM to 4:00 PM using ~~the following link:~~

[DSNY Public Hearing \(9AM to 12PM, 1PM to 4PM\) | Meeting Join | Microsoft Teams](#)

Meeting ID: 294 656 818 071 5

Passcode: 3nT64Qi3

~~+1 646 893 7101, 462681142#~~ United States, New York City

Phone conference ID: 462 681 142#

Oral and written comments ~~will be~~were accepted on the Draft Scope of Work at that meeting. The period for receiving written comments ~~will remain~~ed open until 5:00 PM on October 30, 2025. ~~Written comments may be sent to the project contact person: Abas O. Braimah, Administrative City Planner, DSNY Bureau of Legal Affairs, 125 Worth Street, Room 710, New York, NY 10013. Email: containerEIS@dsny.nyc.gov ; Telephone: 646-885-4993.~~

A summary of the comments received on the Draft Scope of Work and responses to each comment are provided in **Appendix A** to the Final Scope of Work. After considering comments received during the public comment period, this Final Scope of Work was prepared to direct the content and preparation of the DEIS. Revisions to the Draft Scope of Work have been incorporated into this Final Scope of Work and are indicated by underlining new text and striking deleted text.

This ~~Draft~~Final Scope of Work is also available on DSNY's website: <https://www.nyc.gov/site/dsny/collection/containerization.page> or by contacting Abas O. Braimah, Administrative City Planner, DSNY Bureau of Legal Affairs, ~~and at the public repository for the Proposed Program's environmental review documents: New York City Department of Sanitation, 125 Worth Street, Room 710, New York, NY 10013, Email: containerEIS@dsny.nyc.gov ; Telephone: 646-885-4993.~~

~~After considering comments received during the public comment period, a Final Scope of Work will be prepared to direct the content and preparation of the DEIS.~~

1.1 Background

DSNY collects waste from most ~~residential~~ buildings with residential units in the City, with the exception of ~~residential~~ buildings where owners have opted to use private carter service and ~~residential~~ buildings with residential units that are still under development and without a certificate of occupancy. In addition, DSNY provides ~~curbside and~~ containerized collection services for certain larger residential unit buildings, as well as all City public schools and for City-owned buildings.

Since the 1960s, DSNY has collected plastic bags of residential waste set out at the curb. Today, DSNY collects over 24 million pounds of waste set out at the curb each day. The immense number of plastic bags block the sidewalk, obstruct pedestrian access and fall into the streets, and impede traffic. Additionally, plastic refuse bags set out at the curb attract rats, vermin, and other vectors; cause odors; leak garbage fluids if torn; may affect surface waters through stormwater runoff; and may cause worker health and safety issues. Placing waste in containers reduces these impacts.

The plastic refuse bags have been historically collected manually by sanitation workers using standard rear-loader collection vehicles.

1.1.1 Initial Assessment of Waste Containerization in the City

DSNY undertook an initial assessment of waste containerization in the City and in April 2023, released a report on the viability of waste containerization in the City (see “[The Future of Trash – Waste Containerization Models and Viability in New York City](https://dsny.cityofnewyork.us/wp-content/uploads/reports/future-of-trash-april-2023.pdf)”²). *The Future of Trash* report, which assessed the applicability of various containerization systems and models ~~applicability~~ in the City, concluded that containerization is viable in the City for most residential streets – with individual bins in low-density residential neighborhoods, and ~~stationary on-street~~ shared containers in mid- to high-density residential neighborhoods.

1.1.2 Current Residential Waste Containerization Program

DSNY has begun to implement its residential waste containerization program to eliminate the accumulation of curbside plastic refuse bags and improve the quality of life in the City. Under DSNY rules, which became effective on November 12, 2024, buildings citywide with one to nine residential units and all City agencies are required to set out their refuse in rigid receptacles with tight fitting lids.³ Separation of food and yard waste became mandatory for residential properties on April 1, 2025, requiring all residential properties to additionally containerize food waste in rigid receptacles with tight fitting lids.

1.1.2.1 Manhattan CD 09 Waste Containerization Pilot Program

In October 2024, DSNY completed an Environmental Assessment Statement (EAS) to implement a waste containerization pilot program at certain buildings with residential units and schools within Manhattan ~~Community District (CD)~~ 09 (Manhattan CD 09 Pilot Program, CEQR No. 25DOS001M). As shown in **Figure 1-1**, Manhattan CD 09 is located in the northwest section of the borough of Manhattan encompassing the West Harlem neighborhoods of Morningside Heights, Manhattanville and Hamilton Heights, and is generally bounded by West 155th Street to the north, the Hudson River to the west, Cathedral Parkway/West 110th Street to the south, and Manhattan/Morningside/St. Nicholas/Bradhurst/Edgecombe Avenues to the east.

² <https://dsny.cityofnewyork.us/wp-content/uploads/reports/future-of-trash-april-2023.pdf>

³ Commencing in ~~As of~~ June 2026, residential buildings with one to nine units ~~will be~~ are required to use the Official NYC Bin, equipped with wheels and a secure latching lid.
<https://www.nyc.gov/site/dsny/collection/containerization/nyc-bin-faq.page>



Figure 1-1. Manhattan Community District (CD) 09

On November 15, 2024, pursuant to Section (§) 753 and § 1043(a) of the City Charter and § 16-120 of the City Administrative Code, DSNY amended its rules to establish a pilot program for the use of stationary on-street containers in Manhattan CD 09. Effective December 15, 2024, Chapter 1 of Title 16 of the Rules of the City (16 RCNY) was also amended by adding a new section, § 1-02.6 Stationary On-Street Container Pilot Program.⁴ As per 16 RCNY § 1-02.6, the Manhattan CD 09 Pilot Program commenced on June 1, 2025.

Under the Manhattan CD 09 Pilot Program, buildings with residential units within Manhattan CD 09 containerize their refuse as follows for DSNY collection: buildings with 10 to 30 residential units have the option to use individual bins or stationary on-street containers; and buildings with 31 residential units or more use stationary on-street containers. Under the Manhattan CD 09 Pilot Program, schools within Manhattan CD 09 that receive DSNY collection services utilize separate stationary on-street containers for each waste stream (refuse, organics, MGPC, paper/cardboard recyclables).

The purpose of the rule (16 RCNY § 1-02.6) was to pilot DSNY's implementation of waste containerization requirements for buildings with 10 or more residential units. Manhattan CD 09 was chosen by DSNY as the pilot area because it is within one of the rat mitigation zones^{5,6} designated by New York City Department of Health and Mental Hygiene (NYCDOHMH), as shown on **Figure 1-2**, and it offered a diverse set of building types and streetscapes. The EAS completed in October 2024 for the Manhattan CD 09 Pilot Program was also used for the environmental review of 16 RCNY § 1-02.6. DSNY, as Lead Agency, issued a Negative Declaration on October 15, 2024 indicating that the pilot program would not result in significant adverse environmental impacts.

In July 2025, DSNY issued a technical memorandum to update the October 2024 EAS to address newly available information for the Manhattan CD 09 Pilot Program, including:

- Updated estimates of the quantity of stationary on-street containers projected; and
- Updated estimates of curbside length required for stationary on-street containers.

As detailed in the July 2025 technical memorandum, the conclusions disclosed in the October 2024 EAS remain valid and the updates to the pilot program elaborated in the July 2025 technical memorandum would not result in significant adverse environmental impacts.

The Manhattan CD 09 Pilot Program was fully operational on June 1, 2025 with ~~4,057~~1,089 stationary on-street containers installed. As part of the Manhattan CD 09 Pilot Program, DSNY, in collaboration with the NYCDOT, New York City ~~Public Schools~~Department of Education (DOE) school principals, and/or building superintendent(s), installed ~~589~~618 stationary on-street containers for buildings containing 31 or more residential units, and 92 stationary on-street containers for schools within Manhattan CD 09. DSNY also installed two (2) stationary on-street containers for one institution (a nonprofit) that receives DSNY collection within Manhattan CD 09. Approximately 56 percent of buildings with 10 to 30 residential units in Manhattan CD 09 chose to opt-in to use stationary on-street containers. Therefore, DSNY installed ~~374~~379 stationary on-street containers for buildings containing 10 to 30 residential units.

⁴ <https://codelibrary.amlegal.com/codes/newyorkcity/latest/NYCrules/0-0-0-147946>

⁵ Rat Mitigation Zones are areas with high levels of rat activity, where City agencies focus resources to address rats and the conditions that support them. <https://www.nyc.gov/site/doh/health/health-topics/rats.page>

⁶ Source of Rat Mitigation Zone boundaries: [NYC's rat mitigation zones | Environment and Health Data Portal](#)

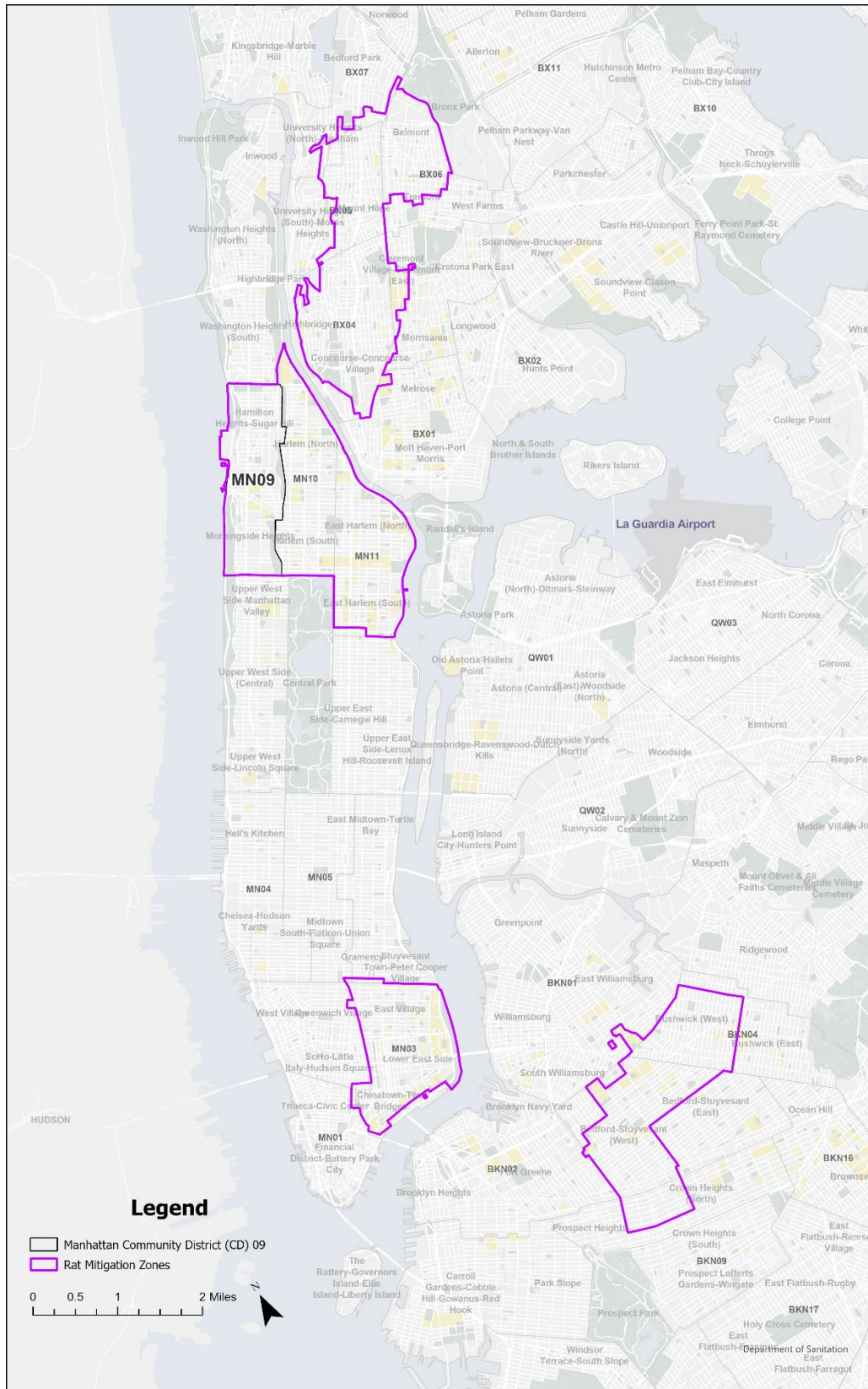


Figure 1-2. City Rat Mitigation Zones

1.2 Purpose and Need

In October 2022, ~~Mayor Adams and~~ DSNY kicked off the “Trash Revolution,” the Citywide effort to move millions of pounds of trash per day in the City from black plastic bags on the sidewalk to rat-resistant, closed containers. This undertaking has led to record-breaking reductions in rat sightings. As part of the “Trash Revolution,” the City has committed to ~~getting all~~ moving 100% of plastic refuse bags off City streets.

The use of stationary on-street containers and individual bins for waste disposal would allow DSNY to support the City’s commitment to street cleanliness and reducing potential food sources for vectors (e.g., rats and vermin). These changes align with other City initiatives to increase the use of containers for waste storage and collection, and ~~creating~~ create cleaner, more livable, and more vibrant streets and neighborhoods across the City.

1.3 Proposed Action

As described in *The Future of Trash* report, containerization throughout the City is not feasible with a “one size fits all” solution. Based upon the learnings and successful implementation of the Manhattan CD 09 Pilot Program and to expand upon the current residential waste containerization program described in **Section 1.1.2**, DSNY is proposing the Citywide Containerization Program.

Under the proposed Citywide Containerization Program:

- Buildings within the City would containerize their refuse as follows for DSNY collection:
 - Buildings with 10 to 30 residential units would have the option to use individual bins or stationary on-street containers, and
 - Buildings with 31 or more residential units would use stationary on-street containers.
- Schools in Manhattan CD 09 and Brooklyn CD 02 ~~within the City~~ that receive DSNY collection services would utilize separate stationary on-street containers for each waste stream (refuse, organics, MGPC, and paper/cardboard ~~recyclables~~).

DSNY’s authority to implement the Proposed Program is pursuant to § 753 and § 1043(a) of the City Charter and § 16-120 of the City Administrative Code.⁷

⁷ In support of the proposed Citywide Containerization Program, the City Council has proposed an associated bill, Int. No. 1123-2024, to amend § 16-114 of the City Administrative Code titled – Stationary On-street Containers for the Storage and Collection of Residential Waste (Int. No. 1123). Int. No. 1123 would amend the City Administrative Code by adding a new section, § 16-114.2 Stationary On-street Containers. The proposed Int. No. 1123 would authorize DSNY to establish and maintain a program, by no later than June 1, 2032, for buildings with 10 or more residential units to place residential waste in stationary on-street containers. However, Int. No. 1123 would allow buildings with 10 to 30 residential units to opt out of the proposed Citywide Containerization Program on the condition that these buildings set out their residential waste for collection by DSNY in rigid receptacles with tight-fitting lids.

1.3.1 Stationary On-street Container Description

The ~~proposed~~ stationary on-street containers for the proposed Citywide Containerization Program are shown in **Figure 1-3** and **Figure 1-4** and would be the same as those used for the Manhattan CD 09 Pilot Program.

As part of the Proposed Program, certain ~~residential~~ buildings with residential units Citywide and schools in Manhattan CD 09 and Brooklyn CD 02 utilizing stationary on-street containers would be assigned one or more stationary on-street containers. The ~~stationary on-street~~ containers would be assigned to a building and installed in front of or near their respective properties. DSNY would work with NYCDOT, ~~DOE school principals~~ New York City Public Schools, and/or building superintendent(s), on the specific placement of the stationary on-street containers.



Figure 1-3.
**Stationary On-street Container for
Storage of Refuse from Buildings with 10
or more Residential Units**

Container size is not to scale. All containers
are the same size.



Figure 1-4.
**Stationary On-street Containers for
Storage of Refuse, Organics, MGPC, and
Paper/Cardboard Recyclables at Schools**

The body and lids of the proposed stationary on-street containers would consist of high-density polyethylene (HDPE), a durable material with high resistance to impact, chemicals and weather. The stationary on-street containers have been designed to allow for minimally invasive installation, high visibility and ease of use. For each stationary on-street container, two small alignment blocks would be affixed to the pavement of the parking lane with bolts and anchors. The alignment blocks would be installed to align the stationary on-street container in front of or near their respective properties and prevent the containers from being easily shifted off center. The alignment blocks, bolts, and anchors can be removed by DSNY along with the stationary on-street container for street milling, paving, maintenance, and/or other types of NYCDOT work or other closures.

Each stationary on-street container, inclusive of the alignment blocks, would be 6.16 feet long by 5 feet wide by 5.25 feet tall, with a capacity of approximately four (4) cubic yards (cy). To prevent vehicles from hitting parking too close to the stationary on-street containers, ~~flexible pedestrian posts/delineators~~ would be affixed to the ground on either side of the container(s) to act as a buffer. The stationary on-street containers would be raised above the ground by approximately 1.3 inches

and installed approximately twelve (12) inches from the curbline, allowing the unimpeded passage of stormwater run-off ~~rainwater~~ in front of and under the stationary on-street containers.

Under the proposed Citywide Containerization Program, DSNY would use Automated Side Loader (ASL) collection vehicles to collect the waste from the stationary on-street containers. As shown on **Figure 1-5**, ASL collection vehicles have an arm on one side of the collection vehicle whereby a sanitation worker can, from within the truck, mechanically grab, lift, and empty the stationary on-street containers, while a second sanitation worker stands outside the truck to monitor for safety. The ASL collection vehicles are able to empty a stationary on-street container in ~~less than~~ approximately one minute.⁸



Figure 1-5. Automated Side Loader (ASL) Collection Vehicle

⁸ Each stationary on-street container can hold approximately 45 plastic refuse bags. Manual collection of a comparable number of bags by sanitation workers would take several times longer to complete.

Access to the stationary on-street containers would be limited to building ~~or school~~ staff and DSNY via designated access cards. Property owners would be responsible for cleaning the curb area surrounding the stationary on-street containers. During DSNY routine waste collection, if waste is observed near or under the containers, the waste would be collected by sanitation workers.

DSNY would be responsible for cleaning and maintaining the stationary on-street containers. Routine scheduled cleaning of the stationary on-street containers and the immediate surrounding area would be performed a minimum of four times per year by the container vendor.

1.3.2 Individual Bins

As part of the Proposed Program, certain buildings with 10 to 30 residential units may choose to set out their refuse at the curb for DSNY collection in rigid receptacles with tight-fitting lids not exceeding 55 gallons in size (individual bins) instead of stationary on-street containers. An example of individual bins for the Citywide Containerization Program is shown on **Figure 1-6**.

~~The individual bins would be set out for DSNY collection at the curb in front of or near their respective properties.~~



Figure 1-6. Individual Bins

Buildings with residential units that use individual bins are required to meet DSNY's Rules regarding "Requirements for Receptacles and Bags Containing Solid Waste and Recyclables for Collection" (Section 1-02.1 of Title 16 of the rules of the City of New York), summarized below:

- Receptacles (Individual bins) must be kept clean and in good repair; and
- If other storage areas on the premises are not available, receptacles may be stored in the area within three feet of the building line on the sidewalk, provided that such receptacles are maintained in an orderly manner and do not impede or obstruct pedestrian flow on the sidewalk.

2 ANALYTICAL FRAMEWORK

In accordance with the process described in SEQRA and CEQR, DSNY, as lead agency, is required to examine the potential for environmental effects that could occur as a result of the proposed Citywide Containerization Program, and, to the maximum extent practicable, avoid or mitigate potentially significant adverse environmental impacts, consistent with social, economic, environmental and other essential considerations. The City's 2025 CEQR Technical Manual provides guidelines for conducting environmental reviews.

The DEIS will be prepared in accordance with the guidelines presented in the *CEQR Technical Manual*, as applicable, and additional guidance from the City's expert technical agencies: NYCDOT, NYCDEP, NYCLPC, SHPO, and NYCPD CMTA NYCT. For each technical area that warrants assessment, the analysis will include an inventory of existing conditions establishing a baseline against which future conditions can be projected (Future No-Action Condition). The DEIS will take into account all known projects impacting the curb through the Build Year in the Future No-Action Condition. The analysis will also include an examination of the Proposed Program's likely effects on the environment (Future with the Proposed Action) in the expected year of full program implementation (Build Year). The Proposed Program's Build Year is 2032. In certain technical areas, this comparison can be quantified and the potential impacts assessed in accordance with the *CEQR Technical Manual*. In other technical areas, the analysis will be qualitative in nature.

Environmental Review Process

The first step in preparing the DEIS ~~will be~~ is the public scoping process. Scoping, or creating the scope of work for the DEIS, is the process of focusing the environmental impact analysis on the key issues relevant to the Proposed Program. The scoping process includes the development of a Draft Scope of Work ~~(this document)~~, which ~~will be~~ was available for public review and comment, as well as conducting public meetings to obtain feedback from interested parties prior to finalizing the DEIS Scope of Work. This ~~Draft~~ Final Scoping Document was prepared in accordance with all applicable laws and regulations and the City's *CEQR Technical Manual*. The DEIS will be based on the Final Scope of Work and will also be subject to public review, including a public hearing and a period of public comment. After the public comment period on the DEIS closes, a Final EIS (FEIS) will be prepared, including a summary of the comments and responses on the DEIS and any revisions to the DEIS. DSNY, as lead agency, and involved agencies will make CEQR findings based on the FEIS, before making a decision on project approval.

As described in greater detail below, the DEIS will contain:

- A description of the Proposed Program and the environmental setting (existing environmental conditions);
- An analysis of the potential for adverse environmental impacts to result from the Proposed Program;
- A description of mitigation measures proposed to eliminate or minimize any significant adverse environmental impacts disclosed in the DEIS, if any;
- An identification of any adverse environmental effects that cannot be avoided if the Proposed Program is implemented;
- A discussion of alternatives to the Proposed Program; and

- A discussion of irreversible and irretrievable commitments of resources, if any, to develop the Proposed Program.

2.1 Analytical Approach

As discussed above, the *CEQR Technical Manual* provides suggested methodologies for conducting environmental assessments performed under CEQR. The impact analysis methodologies presented in the *CEQR Technical Manual* were applied to the proposed Citywide Containerization Program.

CEQR allows a focused environmental review. This process identifies technical areas (see **Section 2.1.1**) that are not applicable and/or do not require screening analyses to confirm that these technical areas would not be affected and do not warrant additional analysis. The environmental review will focus on those technical areas that have the potential to be affected by the Proposed actionProgram.

An initial review was conducted to determine which technical areas required a detailed assessment based on the potential effects of the proposed Citywide Containerization Program. Those technical areas that did not warrant further assessment consistent with *CEQR Technical Manual* guidance are described in **Section 2.1.1**. If further assessment is warranted, a description of the assessment methodology is provided within the applicable sections in **Section 3**.

As discussed in **Section 1.1.2**, a waste containerization pilot program was implemented in Manhattan CD 09 (Manhattan CD 09 Pilot Program, CEQR No. 25DOS001M). The EAS for the Manhattan CD 09 Pilot Program identified the technical areas with the potential for impact due to the proposed waste containerization and the development of appropriate study areas. As such, the EAS for the Manhattan CD 09 Pilot Program was used to inform the proposed analysis approach for the proposed Citywide Containerization Program DEIS, as applicable and appropriate.

2.1.1 CEQR Technical Areas to be Assessed

An initial review was conducted for each CEQR technical area in order to determine which technical areas warranted an impact analysis. The following CEQR technical areas are not applicable or are expected to be screened out and would not warrant further assessment under the 2025 CEQR Technical Manual:

- **Land Use and Zoning** - The proposed Citywide Containerization Program would not alter existing land use or zoning districts, require the development of any property, or impact any potential development of incremental housing.
- **Community Facilities and Services** - The proposed Citywide Containerization Program would not physically or permanently alter or displace an existing facility and would not involve the addition of new populations that require changes to community facilities and services.
- **Open Space** - The proposed Citywide Containerization Program would not involve the loss or limitation of public open space, or a change in the quality or availability of open space and recreation.

- **Shadows** - The proposed Citywide Containerization Program would not include any permanent structures ~~or a proposed component~~ over 250 feet in height, a structure between 50 and 250 feet in height adjacent to a that could cast new shadows or substantially increase existing shadows on sunlight-sensitive resources, or greater than 50 feet of incremental height change or substantial changes in bulk building envelope.
- **Natural Resources** - The proposed Citywide Containerization Program consists of the use of stationary containers on City streets and would therefore not affect natural resources.
- **Hazardous Materials** - The proposed Citywide Containerization Program would not affect the presence or disturbance of hazardous materials.
- **Water and Sewer Infrastructure** - The proposed Citywide Containerization Program would not adversely affect water and sewer infrastructure. The stationary on-street containers would have four sliders, one at each corner, that would raise them above the ground by approximately 1.3 inches, allowing the unimpeded passage of water under the containers. In addition, the containers ~~are~~would be installed approximately twelve (12) inches from the curblin allowing rainfall runoff to flow freely. The proposed Citywide Containerization Program would not involve the significant use of water or sanitary sewer infrastructure.
- **Energy** - The proposed Citywide Containerization Program would not generate significant changes in energy demands.
- **Construction** - Construction related to the proposed Citywide Containerization Program would be minimal and limited to the installation of alignment blocks and ~~pedestrian posts/delineators~~. Alignment blocks would be installed in the parking lane to align the stationary containers on the street in front of or near their respective properties and prevent them from being easily shifted off center. ~~Flexible pedestrian posts-Delineators~~ would be affixed to the ground on either side of the container(s).

Detailed analyses will be provided as appropriate for the remaining CEQR technical areas:

- Public Policy;
- Socioeconomic Conditions;
- Historic and Cultural Resources;
- Urban Design and Visual Resources;
- Solid Waste and Sanitation Services;
- Transportation;
- Air Quality;
- Greenhouse Gas Emissions and Climate Change;
- Noise;
- Public Health; and
- Neighborhood Character;
- Effects on Disadvantaged Communities; and
- Alternatives.

3 SCOPE OF WORK

The proposed Scope of Work for each of the technical areas to be analyzed in the DEIS is described below. Detailed analyses will be provided as appropriate for public policy, socioeconomic conditions, historic and cultural resources, urban design and visual resources, solid waste and sanitation services, transportation, air quality, greenhouse gas emissions and climate change, noise public health, ~~and neighborhood character, effects on disadvantaged communities, and alternatives.~~ As discussed in **Section 2.1.1** and consistent with the *CEQR Technical Manual*, based on the anticipated limited impact of the Proposed Program, the following CEQR technical areas are expected to be screened out of any need for detailed discussion: land use and zoning; community facilities and services; open space; shadows; natural resources; hazardous materials; water and sewer and infrastructure; energy; and construction.

3.1 Public Policy

In accordance with the *CEQR Technical Manual*, a public policy assessment should consider a project's effect on existing public policies. If the assessment concludes that the proposed project could alter or conflict with identified policies, a detailed assessment would be conducted.

This public policy assessment will address whether the Proposed Program would be consistent with officially adopted public policies and initiatives, including the City's Solid Waste Management Plan (SWMP), PlaNYC: Getting Sustainability Done, the New York City Streets Plan, the Curb Management Plan, and Vision Zero. Since the Proposed Program would affect Coastal Zone areas designated by New York State and City, an assessment of the Proposed Program's consistency with the New York City Waterfront Revitalization Program (WRP) would be included.

3.2 Socioeconomic Conditions

According to the *CEQR Technical Manual*, the socioeconomic character of an area includes its population, housing, and economic activity. Socioeconomic changes may occur when a project directly or indirectly changes any of these elements. Following the guidelines of the *CEQR Technical Manual*, the five principal issues that need to be considered with respect to the socioeconomic conditions analysis are whether a project would result in significant adverse impacts due to: (1) direct residential displacement; (2) direct business displacement; (3) indirect residential displacement; (4) indirect business displacement due to increased rents or retail market saturation; and (5) adverse effects on a specific industry. The following describes whether and how each of these issues would be addressed in the DEIS.

3.2.1 Direct Residential or Business Displacement

Direct displacement is the involuntary displacement of residents or businesses from a site(s) directly affected by a proposed project. The Proposed Program would not result in the direct displacement of any residents or business. Accordingly, a further assessment ~~would not be~~ is not required.

3.2.2 Indirect Residential or Business Displacement

Indirect displacement is the involuntary displacement of residents, businesses, or employees that results from a change in socioeconomic conditions created by a proposed project. As part of the Proposed Program, the stationary on-street containers would be located in the parking lane and their placement would result in a reduction of on-street parking in certain areas of the City.

The objective of the indirect residential displacement analysis would be to determine whether the Proposed Program may either introduce or accelerate a trend of changing socioeconomic conditions that may potentially displace a vulnerable population to the extent that the socioeconomic character of the neighborhood would change. This assessment would analyze whether the reduction of on-street parking due to the Proposed Program would lead to disinvestment in a neighborhood due to a decrease of a residential amenity (on-street parking availability).

The objective of the indirect business displacement analysis would be to determine whether the reduction of available on-street parking spaces for customers of local businesses would lead to the indirect displacement of businesses in an area. ~~This assessment would analyze whether the reduction of on-street parking due to the Proposed Program would lead to indirect displacement of businesses, such as retail stores, that provide important products or services to residents or businesses.~~

3.2.3 Adverse Effects on Specific Industries

The Proposed Program would not affect the economic and operational conditions of any specific industry. With the Proposed Program, the reduction of available on-street parking is not expected to substantively alter the retail market in a manner that could lead to the loss or substantial diminishment of neighborhood goods and services. Therefore, an assessment of adverse effects on conditions within specific industries ~~would not be~~ is not warranted.

3.3 Historic and Cultural Resources

Pursuant to the *CEQR Technical Manual*, the lead agency identifies and evaluates the historic and cultural resources within the Proposed Program's project area to determine whether the Proposed Program would lead to any significant impacts. For purposes of CEQR and this analysis, the following are specifically considered historical and cultural resources: (1) designated City landmarks, designated scenic landmarks and properties within designated City historic districts; (2) resources calendared for consideration as a designated City landmark, scenic landmark or property within a designated City historic district by NYCLPC; (3) resources listed in, or formally determined eligible for inclusion in, the State and/or National Register of Historic Places, or contained within a district listed in, or formally determined eligible for listing in, the State and/or National Register of Historic Places; (4) resources recommended for listing by the New York State Board for Historic Places; (5) National Historic Landmarks; and (6) resources not identified by one of the above programs but that meet their eligibility requirements. The Proposed Program will require review, approval, and a report from NYCLPC.

Historic and cultural resources include archaeological (buried) resources and architectural (historic standing structure) resources. The analysis will consider the Proposed Program's potential effects on designated City historic districts or on publicly accessible views, as identified in the New

York State Office of Parks, Recreation and Historic Preservation's (NYSOPRHP) Cultural Resource Information System (CRIS) database, and NYCLPC. In addition, the placement of the stationary on-street containers would result in minor modifications to the street surface due to the alignment blocks. The Proposed Program will not result in the disturbance of brick or cobblestone streets.

3.4 Urban Design and Visual Resources

According to the *CEQR Technical Manual*, an urban design and visual resources assessment considers whether a proposed project may change the experience of a pedestrian in the project area as well as the proposed project's potential to alter the arrangement, appearance, and functionality of the built and natural environment in the project area. Urban design includes all the elements that shape and affect a pedestrian's experience of public space. A visual resource is the connection from the public realm to significant natural or built features, including views of the waterfront, public parks, landmark or historic structures, and natural resources.

According to the *CEQR Technical Manual*, the purpose of the preliminary assessment is to determine whether any physical changes due to the Proposed Program would have the potential to significantly and adversely affect elements of urban design. If a preliminary assessment determines that a change to the pedestrian experience would be minimal and unlikely to disturb the vitality, the walkability, or the visual character of the area, then no further assessment is warranted. If the preliminary assessment shows that changes to the pedestrian environment could be significant and adverse, a detailed analysis would be required.

3.5 Solid Waste and Sanitation Services

A solid waste and sanitation services assessment determines whether a proposed project has the potential to cause a substantial increase in solid waste production that may overburden available waste management capacity or otherwise be inconsistent with the approved City's SWMP or with state policy related to the City's integrated solid waste management system. Consistent with the *CEQR Technical Manual*, if a proposed project is not expected to generate 50 tons per week or more of new solid waste, then the project would not have a significant adverse impact to the City's available waste management capacity and a detailed analysis is not warranted. If a proposed project involves the construction, operation, or closing of any type of regulated solid waste management facility or if it would involve a regulatory change to public or private waste collection, processing, recycling, or disposal activity, a more detailed discussion may be warranted.

The Proposed Program would not result in a change in the generation or volume of solid waste in the City or the volume of waste handled by permitted waste management facilities currently used by DSNY for its municipal solid waste (MSW) or recyclables. The Proposed Program would require the use of stationary on-street containers for the placement of waste by certain buildings with residential units Citywide and schools in Manhattan CD 09 and Brooklyn CD 02 prior to DSNY collection and require the use of new ASL collection trucks for the collection of this waste. This assessment will also address the Proposed Program's consistency with the current approved SWMP and state policy related to the City's integrated solid waste management system and would evaluate the potential for the Proposed Program to affect the SWMP's goals and policies.

3.6 Transportation

Pursuant to CEQR, the purpose of a transportation analysis is to determine whether a proposed action may have a potential significant impact on the transportation system, which generally includes traffic operations and mobility, public transportation facilities and services, pedestrian elements and flow, safety of all roadway users (pedestrians, cyclists, transit users, and motorists), on- and off-street parking, and/or goods movement. The transportation assessment for the Proposed Program would be conducted pursuant to the methodologies outlined in the *CEQR Technical Manual* and in coordination with NYCDOT. A two-tier screening process is used to determine whether a quantified analysis of any technical areas of the transportation system (e.g., traffic, transit, pedestrian, etc.) is necessary.

3.6.1 Traffic

The focus of the traffic screening assessment would be to determine if the Proposed Program would result in 50 or more vehicle trips at an intersection during any peak hour. If the Proposed Program would exceed the traffic screening threshold of 50 vehicle trips, a detailed traffic analysis would be warranted.

As per the *CEQR Technical Manual*, vehicle trips should be converted to Passenger Car Equivalents (PCEs) to determine if the 50 peak hour vehicle trips threshold is exceeded. A personal automobile is equivalent to 1 PCE and a waste collection truck is equivalent to 1.5 PCEs.

The anticipated number of truck trips generated by the Proposed Program within each CD would be calculated based on information from current DSNY operations and projected future operations for the Build Year and compared with the *CEQR Technical Manual* traffic screening threshold of 50 peak hour vehicle trips (Level 1 screening assessment) to determine whether additional screening and/or detailed analyses would be warranted. The screening assessment would be performed to determine, on a per CD basis: (1) if the use of new ASL collection vehicles to collect waste from the stationary on-street containers and the use of standard rear-loader collection vehicles to collect waste from individual bins would result in an incremental change in truck trips and; (2) if transporting waste from each CD and DSNY garage location to the in-City transfer stations (DSNY and private facilities under contract with DSNY) would result in an incremental change in truck trips. In addition, the vehicle trips associated with the additional employee vehicles traveling to/from the DSNY garages due to the Proposed Program will be included in the screening assessment. If the Proposed Program would result in an increase of 50 or more peak hour vehicle trips within a CD, near a DSNY garage, and/or transfer station, a Level 2 screening assessment would be completed, where project-generated trips are assigned to specific intersections and compared with the *CEQR Technical Manual* traffic screening threshold of 50 vehicle trips. If the Proposed Program would exceed the traffic screening threshold of 50 vehicle trips, a detailed traffic analysis would be warranted.

If a detailed traffic analysis is warranted, the traffic analysis results for the future without the Proposed Program and future with the Proposed Program would be compared to the traffic impact criteria outlined in the *CEQR Technical Manual*, in order to determine the potential for significant adverse traffic impacts. If any significant adverse impacts are predicted, mitigation measures will be identified.

3.6.2 Transit, Ferry, and Pedestrians

The stationary on-street containers would be placed in the parking lane in front of or near their respective properties thereby potentially occupying parking spaces available to the general public. The loss of parking spaces has the potential to result in some people choosing to use other modes of transportation including subway/rail, bus or ferries, where available.

3.6.2.1 Transit and Ferry

Based on the potential loss of parking spaces determined by the parking analysis described in **Section 3.6.4**, the potential use of other modes of transportation will be estimated and compared to the CEQR screening thresholds of 200 or more peak hour subway/rail per station or bus transit riders and 50 peak hour Citywide Ferry Service (CWFS) ferry trips, respectively. ~~This screening assessment will be performed within the prototypical areas described for the parking analysis noted in Section 3.6.4.1.~~ If these CEQR screening thresholds are exceeded, a Level 2 project-generated trip assignment screening assessment would be prepared to determine whether a detailed analysis is warranted. If warranted, a detailed transit and/or ferry analysis would be conducted consistent with the *CEQR Technical Manual*.

3.6.2.2 Pedestrians

Based on the potential loss of parking spaces determined by the parking analysis described in **Section 3.6.4**, any associated potential additional pedestrian trips to and from the transit and ferry stops and/or their trip destination would be estimated and compared to the CEQR screening threshold of 200 or more incremental pedestrian trips in a peak hour on a pedestrian element (i.e., sidewalk, crosswalk, or corner). ~~This screening assessment would be performed within the prototypical areas described for the parking analysis noted in Section 3.6.4.1.~~ If the CEQR screening threshold is exceeded, a Level 2 project-generated trip assignment screening assessment would be prepared to determine whether a detailed analysis is warranted. If warranted, a detailed pedestrian analysis would be conducted consistent with the *CEQR Technical Manual*.

3.6.3 Vehicular and Pedestrian Safety

If a detailed traffic and/or pedestrian analysis is required, crash data for the representative intersections warranting analysis for the most recent three-year period would be obtained from NYCDOT or other acceptable sources. This data would be analyzed to determine if any of the study area locations may be classified per the *CEQR Technical Manual* as high crash locations. If any high crash locations are identified, feasible improvement measures would be identified to address potential safety issues.

3.6.4 Parking

The parking analysis will assess the potential effects of the Proposed Program on curbside on-street parking currently available to the general public due to the placement of stationary on-street containers in the parking lane. The parking analysis will identify the extent that on-street parking is available and utilized under existing and future conditions. The parking analysis will include a review of on-street and off-street (garage/parking lot) parking throughout the City on a per CD basis to determine what effect the Proposed Program may have on parking resources in the City.

This analysis would consist of estimating the length of curbside available to the general public for on-street parking under existing conditions and calculating the estimated total length of curbside required for the proposed stationary on-street containers on a per CD basis. The length of curbside publicly-available citywide for on-street parking under existing conditions would be estimated using a combination of publicly-available City data obtained from Geographic Information Systems (GIS) datasets, desktop surveys using Google maps street view, and field surveys in prototypical and select areas in the City to determine existing parking restrictions. Existing parking restrictions, such as fire hydrants, bus stops and bus lanes, curb cuts, bike share stations, hotel loading zones, taxi stands, and no parking/standing signs, etc., will not be included in the curbside length available for parking by the general public. This analysis will determine the length of curbside that would remain available for on-street parking under the future with the Proposed Program.

3.6.4.1 Parking Utilization Analysis

In addition to an analysis of the potential reduction in citywide on-street parking, a parking utilization analysis in the prototypical areas will be performed. As set forth in the *CEQR Technical Manual*, the parking analysis will consider whether the Proposed Program would support future parking demand. This would entail an hourly parking utilization analysis, consisting of four (4) two (2) hour periods throughout the day (7 AM to 9 AM, 12 PM to 2 PM, 5 PM to 7 PM, and 10 PM to 12 AM).⁹ This analysis would identify the future on- and off-street parking conditions without and with a proposed action.

A detailed citywide parking analysis is not feasible due to the City's large geographical area. Therefore, in order to complete a reasonable analysis of potential effects of the Proposed Program, representative prototypical areas were selected in coordination with the NYCDOT for the purpose of performing a parking utilization analysis in each area consistent with the *CEQR Technical Manual*. The parking utilization analysis in these prototypical areas will be used as the basis for further understanding the potential effects of the Proposed Program on the City parking supply.

3.6.4.1.1 Prototypical Areas

The process to identify prototypical areas consisted of reviewing the information in publicly-available GIS datasets to identify 0.25-mile radius areas that:

- Are considered representative of the typical existing conditions throughout the City; and
- Contain a distribution throughout the 0.25-mile radius of buildings with residential units ~~and schools~~ that would potentially be affected by the Proposed Program.

The *CEQR Technical Manual* identifies certain neighborhoods of the City as "Parking Zones 1 and 2" due to the "magnitude" of other alternative modes of transportation available (i.e., where there are subway stations or bus stops within a convenient walking distance [0.25 mile]). These neighborhoods are shown on **Figure 3-1**.

⁹ A parking utilization analysis includes an inventory of all public parking lots and garages within a parking study area and tabulation of the existing number and occupancy of legally regulated on-street parking spaces within the parking study area at certain times of the day.

An evaluation of existing and proposed conditions was completed to select one prototypical area for each of the five boroughs. In addition, a prototypical area representing each of the following three categories was selected:

- CDs fully located in a CEQR Parking Zone;
- CDs partially located in a CEQR Parking Zone; and
- CDs not located in a CEQR Parking Zone.

To determine the prototypical areas, the following elements were considered as primary factors to be included within a 0.25-mile radius prototypical area:

- Areas with a combination of buildings with 10 to 30 residential units and buildings with 31 or more residential units; and
- Areas with mixed-use residential buildings with ground floor commercial uses; ~~and~~
- ~~Areas with schools.~~

Five (5) prototypical areas were selected for analysis to assess the potential effects of the Proposed Program on parking in each of the five boroughs. These prototypical areas are considered representative of the typical existing conditions throughout the City in areas with buildings that would be affected by the Proposed Program and include:

- Prototypical #1 (**Figure 3-2**): Manhattan CD 08
 - Center of 0.25-mile radius: East 76th Street between 2nd and 3rd Avenues.
- Prototypical #2 (**Figure 3-3**): Bronx CD 02
 - Center of 0.25-mile radius: Tiffany Street and Westchester Avenue.
- Prototypical #3 (**Figure 3-4**): Brooklyn CD 09
 - Center of 0.25-mile radius: Montgomery Street between Albany and Troy Avenues.
- Prototypical #4 (**Figure 3-5**): Queens CD 06
 - Center of 0.25-mile radius: 65th Road between 99th and 102nd Streets.
- Prototypical #5 (**Figure 3-6**): Staten Island CD 01
 - Center of 0.25-mile radius: Belmont Place and Daniel Low Terrace.

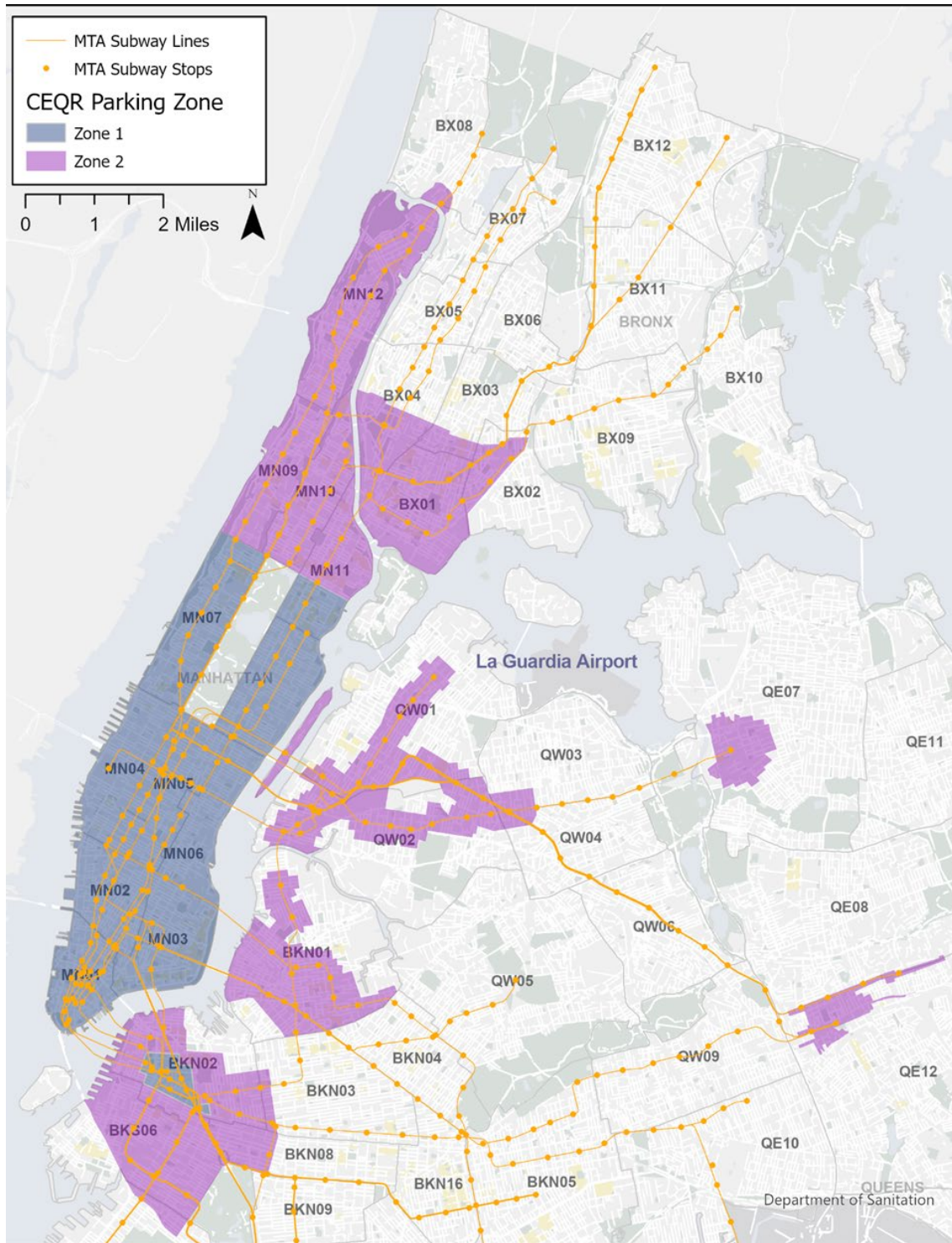
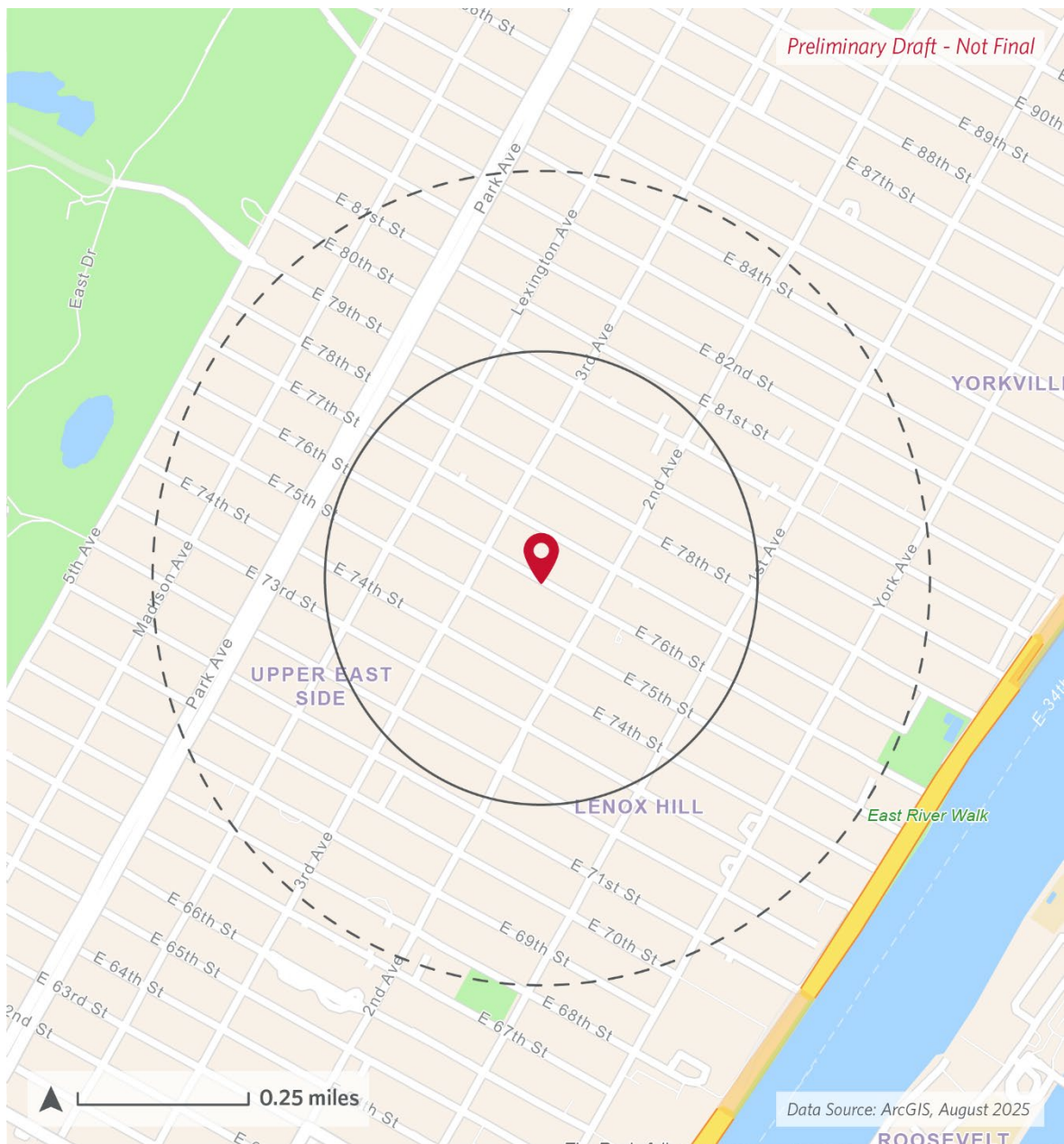


Figure 3-1. CEQR Parking Zones



Prototypical: MN08

-  Prototypical Area Center: E 76th St between 2nd Ave & 3rd Ave
-  0.25 mi radius
-  0.50 mi radius

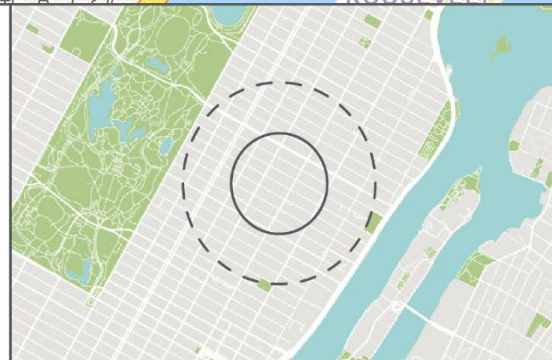
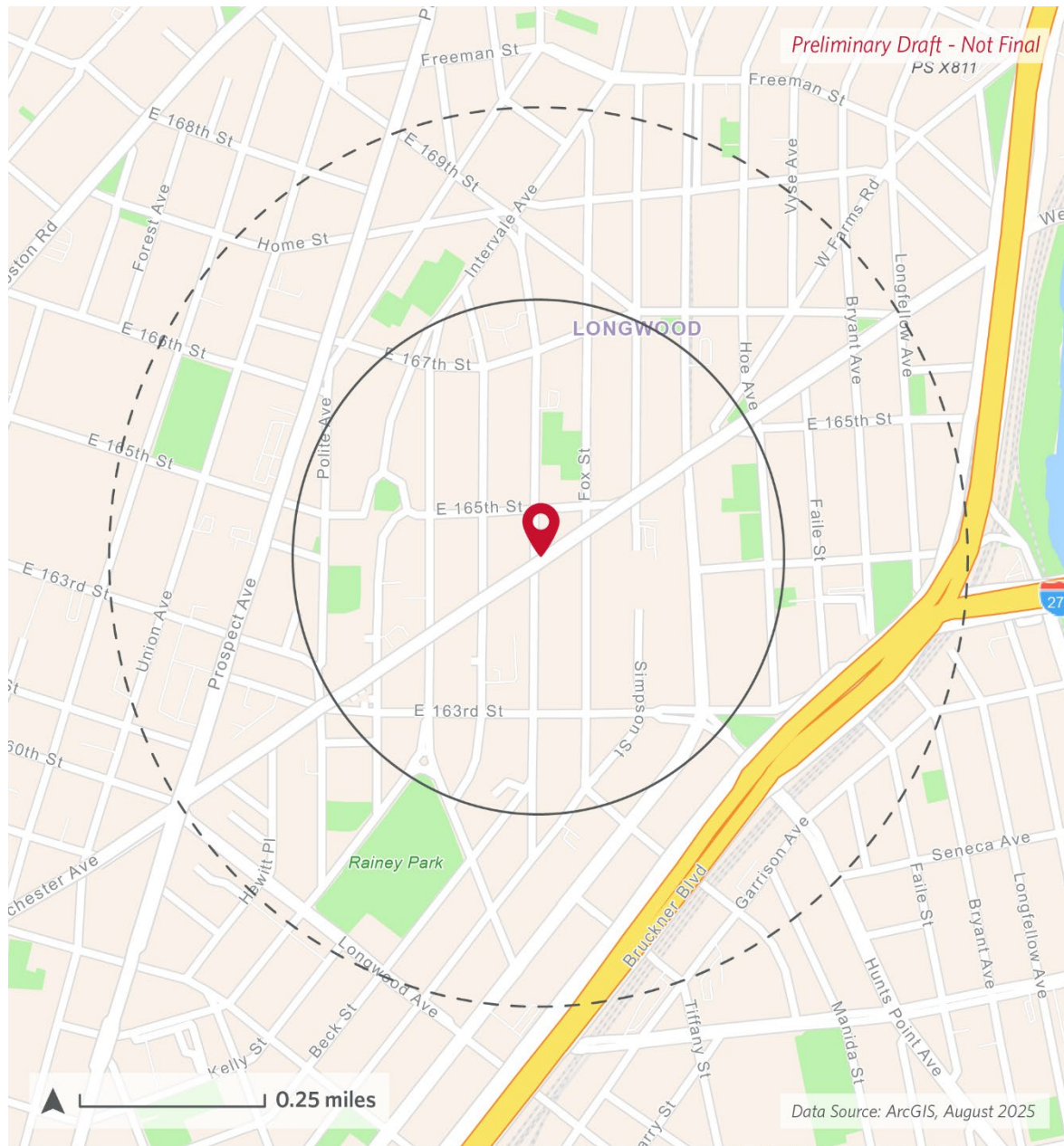


Figure 3-2. Prototypical #1 - Manhattan CD 08



Prototypical: BX02

-  Prototypical Area Center:
Tiffany St & Westchester Ave
-  0.25 mi radius
-  0.50 mi radius

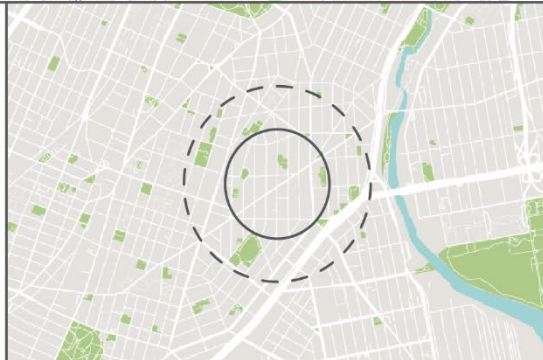
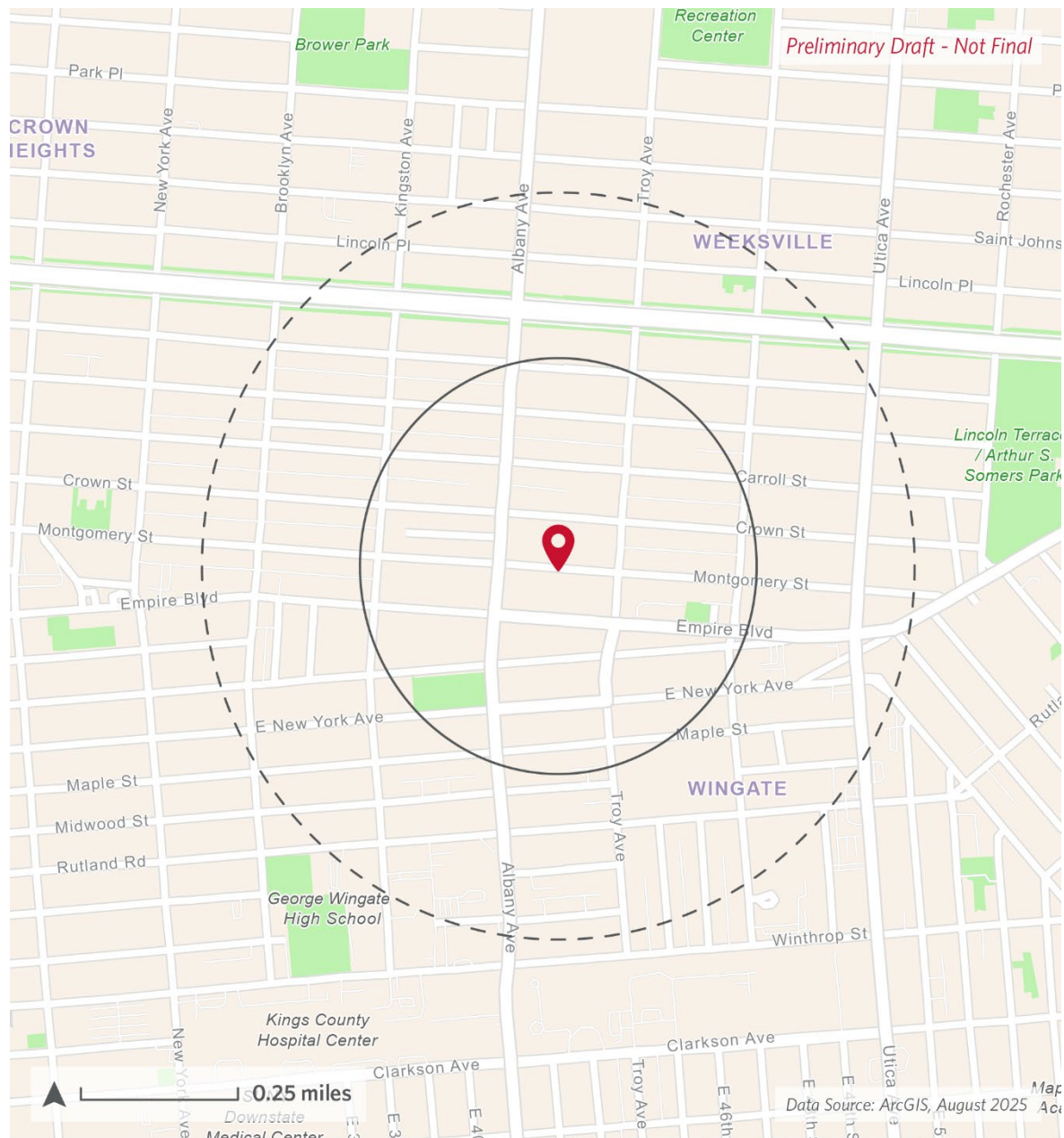


Figure 3-3. Prototypical #2 - Bronx CD 02



Prototypical: BK09

-  Prototypical Area Center: Montgomery St between Albany & Troy Aves
-  0.25 mi radius
-  0.50 mi radius

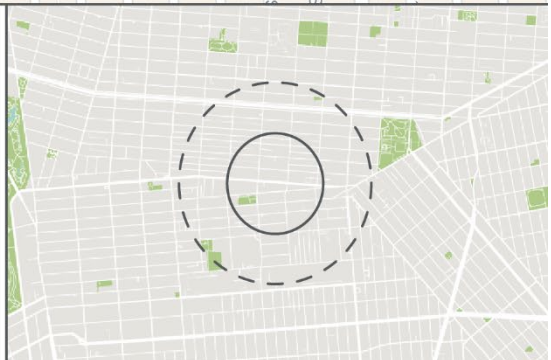
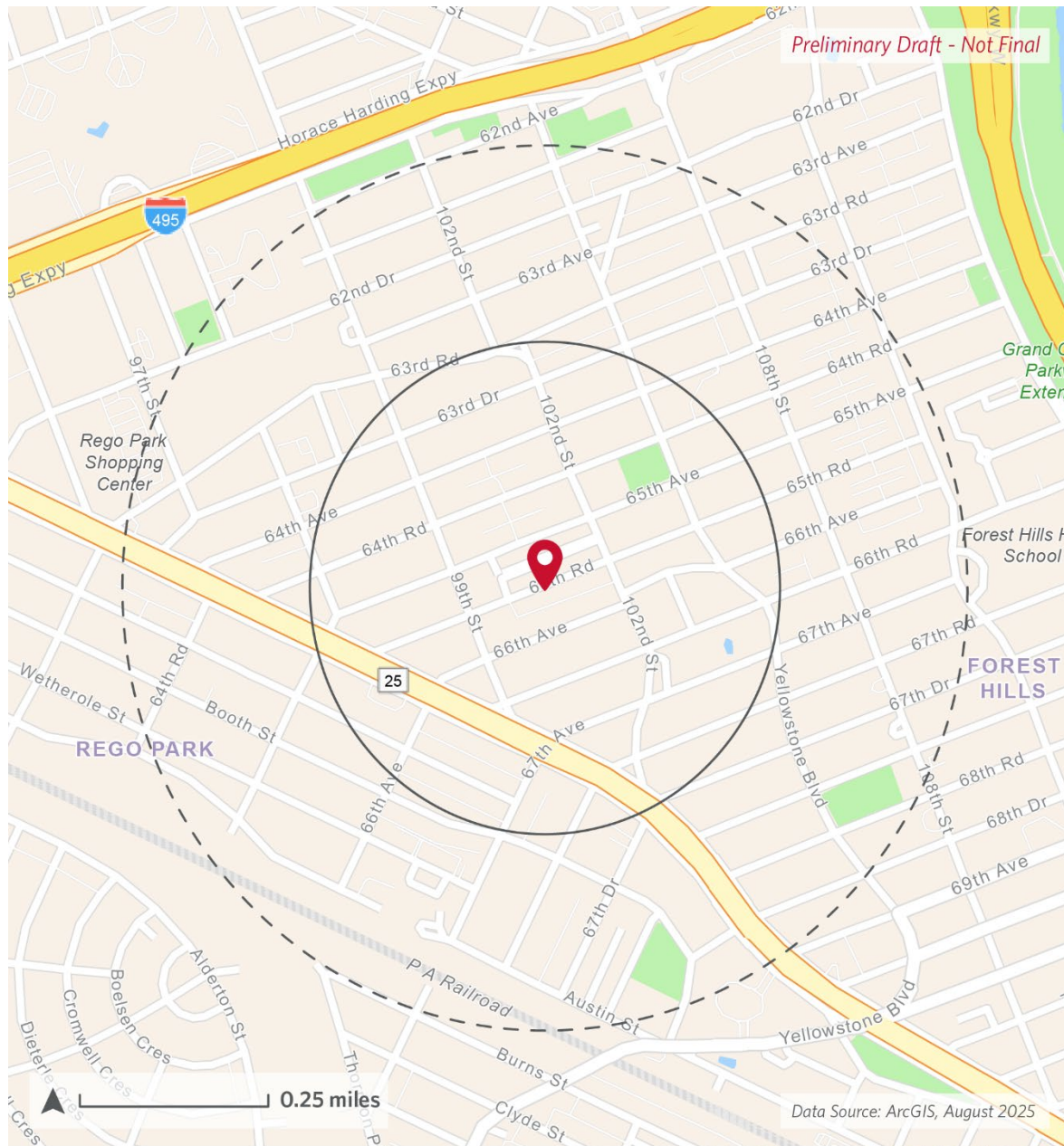


Figure 3-4. Prototypical #3 - Brooklyn CD 09



Prototypical: QW06

-  Prototypical Area Center: 65th Rd between 99th St & 102nd St
-  0.25 mi radius
-  0.50 mi radius

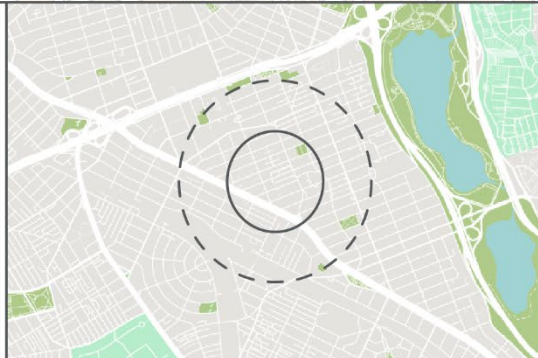
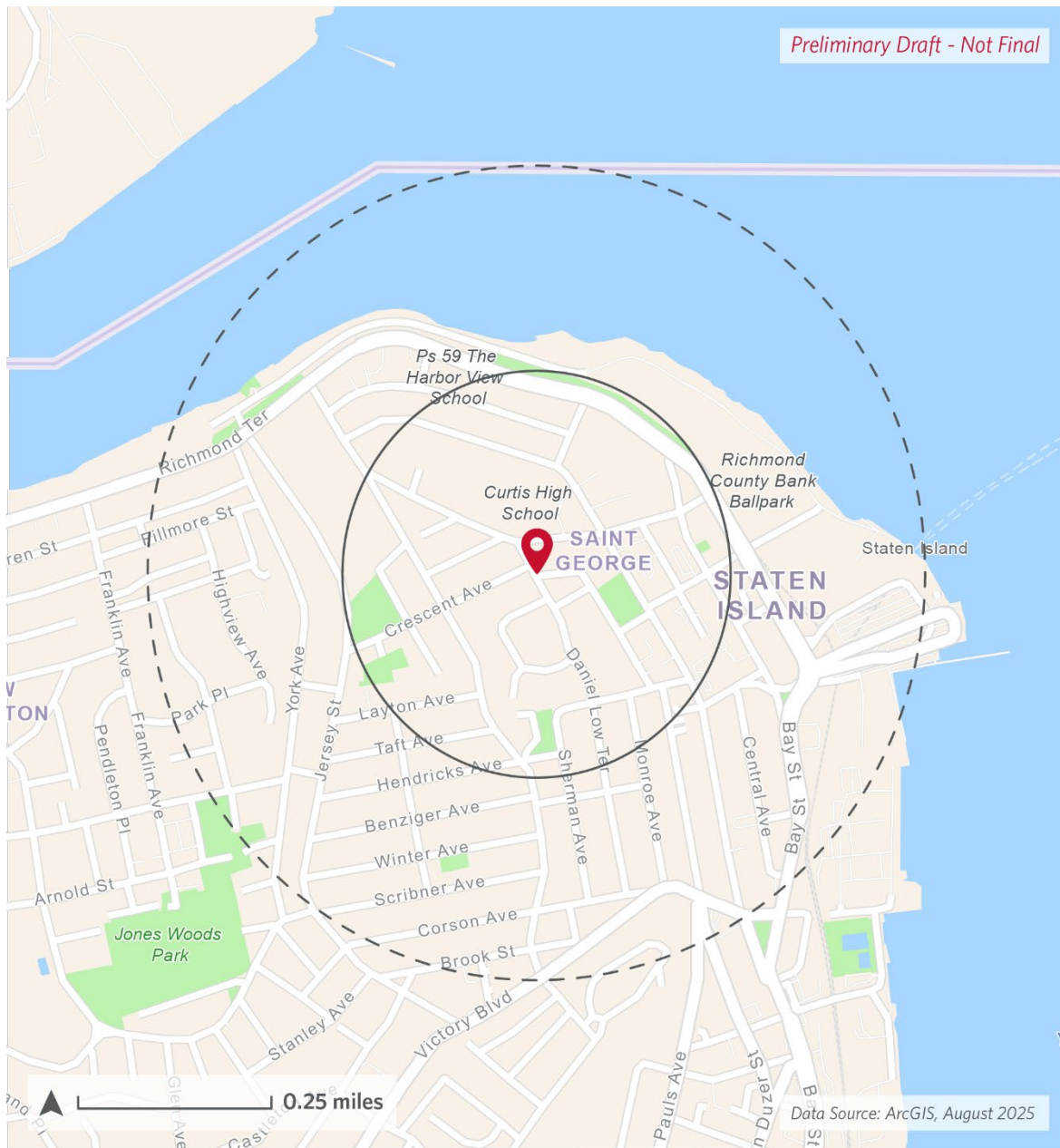


Figure 3-5. Prototypical #4 - Queens CD 06



Prototypical: SI01

-  Prototypical Area Center:
Belmont Place & Daniel Low Terrace
-  0.25 mi radius
-  0.50 mi radius

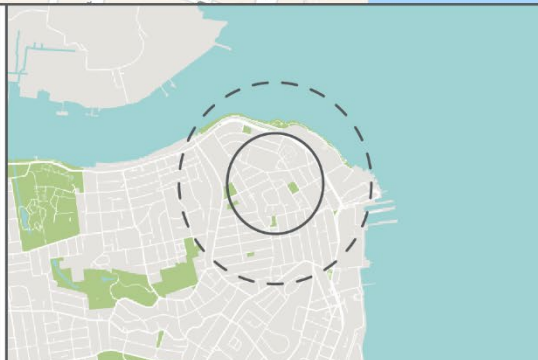


Figure 3-6. Prototypical #5 – Staten Island CD 01

3.6.4.1.2 Prototypical Parking Utilization Analysis

The parking utilization analysis for the Proposed Program will be performed in accordance with the *CEQR Technical Manual* for each of the five prototypical areas.

3.6.4.1.2.a Determination of Potential Parking Shortfalls

As per the *CEQR Technical Manual*, if a proposed project generates the need for more parking than it provides and/or is available, it is considered a shortfall of parking spaces.

- For proposed projects located in CEQR Parking Zones 1 and/or 2:
 - A parking shortfall is generally not considered significant due to the magnitude of available alternative modes of transportation.
- For proposed projects in areas not designated as CEQR Parking Zones 1 and/or 2:
 - A project's parking shortfall may be considered significant.

The *CEQR Technical Manual* states that if a proposed project generates the need for more parking than it provides or is available, this shortfall of spaces may be considered significant; however, a significant shortfall would not be considered an impact.

3.6.4.1.2.b Existing Parking Conditions

An analysis of existing parking conditions will be performed in each of the prototypical areas to determine if there is existing parking capacity (on-street and off-street parking). The analysis will consist of an inventory of on- and off-street parking.

The existing utilization percentage within each prototypical area will be calculated based on the number of on-street parking spaces and their occupancy (i.e., how many of those spaces are occupied and how many are vacant) during four (4) two (2) hour periods throughout the day (7 AM to 9 AM, 12 PM to 2 PM, 5 PM to 7 PM, and 10 PM to 12 AM). The number of available parking spaces for each block within each prototypical area will be determined by calculating the existing length of public curbside space available for use and assuming a parking space is 20 linear feet per the *CEQR Technical Manual*. The occupancy of each parking space will be based on observations in each of the prototypical areas made during data collection.

For off-street parking facilities, the analysis will be completed by compiling the name and location of each publicly-available facility; its posted capacity and, if available, the number of parking spaces utilized; and the percentage of utilization for the representative hours identified.

If it is determined that all of the on-street and off-street parking spaces within a 0.25-mile radius of the prototypical area are utilized during the peak periods analyzed under existing conditions, then there would be no excess parking capacity within the 0.25-mile radius prototypical area. If parking within a 0.25-mile radius of the prototypical area is found to be insufficient, the available parking within a 0.5-mile radius area would be disclosed, consistent with the *CEQR Technical Manual*.

3.6.4.1.2.c Future without and with the Proposed Program

In accordance with the *CEQR Technical Manual*, the DEIS will describe the future without the Proposed Program and future with the Proposed Program in order to determine the potential for a

parking shortfall in CEQR Parking Zones 1 or 2 or if there would be a parking shortfall or significant parking shortfall in areas outside CEQR Parking Zones 1 or 2.

3.7 Air Quality

Under the *CEQR Technical Manual*, an air quality analysis is performed to determine whether a proposed action may result in stationary or mobile sources of pollutant emissions that could have a significant adverse impact on regional or local ambient air quality. Since the Proposed Program would not result in the development of new transfer facilities or expansions of existing facilities, the air quality analysis would only focus on emissions from mobile sources.

If a proposed project may result in significant mobile source air quality impacts, then the *CEQR Technical Manual* recommends a two-step approach to mobile-source evaluation: an air quality mobile-source screening assessment followed by a detailed air quality mobile-source dispersion analysis, if necessary. The Proposed Program would result in an increase in the number of employee vehicles and collection truck trips to collect waste in certain CDs. Therefore, the additional peak day truck trips associated with the Proposed Program will be evaluated through a mobile-source screening assessment, as per the *CEQR Technical Manual*, to determine if a detailed air quality mobile-source dispersion analysis would be warranted.

The *CEQR Technical Manual* provides screening thresholds for carbon monoxide (CO) and fine particles of a diameter of 2.5 microns or smaller (PM_{2.5}).

3.7.1 Carbon Monoxide

The following CO screening thresholds are based on the incremental peak hour auto traffic that a proposed action would generate:

- 160 or more auto trips in downtown Brooklyn or Long Island City, Queens;
- 140 or more auto trips in Manhattan between 30th and 61st Streets; or
- 170 or more auto trips in the rest of the City.

Additional peak day truck trips associated with DSNY waste collection within each CD would be estimated and compared to the CEQR screening threshold for CO to determine if a detailed CO analysis would be warranted for the Proposed Program. Similarly, the additional peak day truck trips associated with transporting waste from each CD and DSNY garage location to the in-City transfer stations (DSNY and private facilities under contract with DSNY) would be estimated and compared to the CEQR screening threshold for CO to determine if a detailed CO analysis would be warranted for the Proposed Program. The additional vehicle trips associated with the incremental employees traveling to/from the DSNY garages due to the Proposed Program will be included in the screening assessment.

3.7.2 Particulate Matter

The *CEQR Technical Manual* provides screening thresholds for PM_{2.5} based on the incremental peak hour vehicle traffic that a proposed action would generate. Typically, if a PM_{2.5} analysis is not required based on the screening assessment, an analysis for fine particles of a diameter of 10 microns or smaller (PM₁₀) is also not required. The *CEQR Technical Manual* screening

thresholds for PM_{2.5} are based on equivalent Heavy-Duty Diesel Vehicle (HDDV) emissions varying per roadway types, as listed in **Table 3-1**.

Table 3-1. CEQR Technical Manual PM_{2.5} Screening Threshold for Heavy-Duty Trucks

Road Classification	PM _{2.5} Screening Threshold
Local	12
Collector	19
Principal and Minor Arterial	23
Expressways & Limited Access Roads	23

Additional peak day truck trips associated with DSNY waste collection within each CD would be analyzed and compared to the CEQR screening threshold for PM_{2.5} to determine if a detailed PM_{2.5} and PM₁₀ analysis would be warranted for the Proposed Program. Similarly, the additional peak day truck trips associated with transporting waste from each CD and DSNY garage location to the in-City transfer stations would be analyzed and compared to the CEQR screening threshold for PM_{2.5} to determine if a detailed PM_{2.5} and PM₁₀ analysis would be warranted for the Proposed Program. The additional vehicle trips associated with the incremental employees traveling to/from the DSNY garages due to the Proposed Program will be included in the screening assessment.

Based on a preliminary review of the incremental truck trips that would result from the Proposed Program, a detailed analysis for CO or particulate matter (PM_{2.5} and PM₁₀) is not anticipated.

3.8 Greenhouse Gas Emissions and Climate Change

Greenhouse gas (GHG) emissions are gases that trap heat in the atmosphere and cause a general warming of the Earth's atmosphere, known as the "greenhouse effect." Water vapor, carbon dioxide (CO₂), nitrous oxide (N₂O), methane (CH₄), and ozone (O₃) are the primary GHGs in the Earth's atmosphere. GHGs are associated with global climate changes including increased intensity of storms and flooding, sea level rise, and temperature increases. New York State's Climate Leadership and Community Protection Act of 2019 (CLCPA) establishes a path to reduce GHG emissions, as well as goals to address climate change, including a goal to limit Statewide GHG emissions to 40 percent of 1990 levels by 2030 and 85 percent by 2050. In addition, PlaNYC: Getting Sustainability Done includes initiatives and goals to reduce the City's GHG emissions 30% below 2025 levels by 2030.

The *CEQR Technical Manual* recommends that a GHG consistency assessment be conducted for City capital projects that require an EIS, power generation projects, projects resulting in 350,000 square feet or more of development, and projects which fundamentally change the City's solid waste management system by changing solid waste transport mode, distances, or disposal technologies. The Proposed Program would not result in construction or new stationary sources of GHG emissions and would not increase the generation of solid waste or change disposal technology or locations.

While the Proposed Program would not fundamentally change the City's solid waste management system, it would result in an increase citywide in the number of truck trips and vehicle miles traveled (VMT) to collect waste from stationary on-street containers. In addition, the Proposed Program would result in additional employee vehicles for the collection of waste, which would result in

additional VMTs. An analysis would therefore be conducted to assess potential changes in VMT citywide and the consistency of the Proposed Program with the City's GHG emission reduction goals.

The Proposed Program would also not involve the construction or operation of any new or modified permanent structures within a coastal floodplain, therefore an assessment of potential effects of global climate change such as sea level rise and increased flood risk due to the Proposed Program is not warranted.

3.9 Noise

The *CEQR Technical Manual* requires that a noise study address the effects of increased noise due to the introduction or re-routing of transportation sources such as vehicular traffic (particularly at sensitive land uses such as residences or open space). In accordance with the *CEQR Technical Manual*, the noise assessment must study (1) a proposed project's potential effects on existing noise sensitive uses and/or locations (i.e., receptors); and (2) the effects of ambient noise levels on new receptors introduced by the proposed project. The Proposed Program would not include new stationary sources of noise or introduce new receptors. The Proposed Program would, however, result in an increase in the number of truck trips collecting waste in certain CDs. Therefore, the noise assessment would only focus on mobile sources of noise emissions from collection vehicles traveling along streets adjacent to noise-sensitive receptors.

The *CEQR Technical Manual* recommends a two-step approach: a mobile-source noise screening assessment followed by a detailed mobile noise analysis, if necessary. Pursuant to the *CEQR Technical Manual*, the mobile-source noise screening assessment would evaluate whether the incremental peak day vehicular trips by DSNY trucks serving their routes within each CD under the Proposed Program would have the potential to result in a doubling of noise PCEs, which would be sufficiently large to result in a 3 A-weighted decibels (dBA) increase in noise levels at existing roadways. Similarly, additional peak day vehicular trips by DSNY trucks transporting waste from each CD and DSNY garage location to in-City transfer stations will be estimated to assess if they would result in a doubling of noise PCEs (3 dBA increase) at existing roadways. The additional vehicle trips associated with the incremental employees traveling to/from the DSNY garages due to the Proposed Program will be included in the screening assessment. If the screening assessment identifies locations that would have the potential to experience a doubling of noise PCEs, a detailed mobile noise analysis would be performed.

Consistent with the *CEQR Technical Manual*, the following noise PCE factors would be used:

- Each Automobile or Light Truck: 1 noise PCE
- Each Medium Truck: 13 noise PCEs
- Each Bus: 18 noise PCEs
- Each Heavy Truck: 47 noise PCEs

If a detailed mobile noise analysis is warranted, the Federal Highway Administration (FHWA) Traffic Noise Model (TNM) would be used to predict noise levels at noise sensitive receptors along representative locations for the future without the Proposed Program and the future with the Proposed Program to determine if the Proposed Program would result in an exceedance of the CEQR noise impact thresholds.

3.10 Public Health

According to the *CEQR Technical Manual*, public health is the organized effort of society to protect and improve the health and well-being of the population through health promotion and prevention of disease, injury, and disability. The goal of CEQR with regard to public health is to determine if the environmental changes resulting from a proposed project would result in significant adverse public health impacts and, if so, to identify measures to mitigate such impacts. In addition to an assessment of potential impacts associated with the proposed project, positive outcomes to public health resulting from a proposed project should also be presented where applicable.

For purposes of this analysis, public health is defined as the activities that society carries out in order to create and maintain an environment in which people can be healthy. The public health analysis would consider the Proposed Program's effects on public health due to the storage and collection of waste from certain buildings using stationary on-street containers and individual bins, as compared to the placement of plastic bags along the sidewalk for collection.

~~One of DSNY's primary goals for The Proposed Program would result in~~ the containerization of waste under the Proposed Program is to and positively impact public health in the City, for both residents and visitors. Plastic refuse bags set out at the curb attract rats, vermin, and other vectors; cause odors; leak garbage fluids if torn; may affect surface waters through stormwater runoff; and may cause worker health and safety issues. Placing waste in containers reduces these impacts.

3.11 Neighborhood Character

The *CEQR Technical Manual* defines neighborhood character as a mixture of various elements that give neighborhoods their distinct "personality", including socioeconomic conditions; historic and cultural resources; urban design and visual resources; transportation; noise; and public policy. Per CEQR, to determine a project's effects on neighborhood character, the elements that contribute to a neighborhood's context are considered together. According to the guidelines of the *CEQR Technical Manual*, an assessment of neighborhood character is generally needed when a proposed project has the potential to result in significant adverse impacts in one of the technical areas presented above, or when a project may have moderate effects on several of the elements that define a neighborhood's character.

This assessment will determine the Proposed Program's potential to affect changes to neighborhood character from activities that could generate significant adverse impacts in any of the technical areas noted above that are considered when analyzing neighborhood character.

3.12 Mitigation

If any significant adverse impacts associated with the Proposed Program are identified, the DEIS would identify potential measures to mitigate those impacts. If any significant impacts are identified and cannot be mitigated, such impacts would be discussed in the DEIS.

3.13 Alternatives

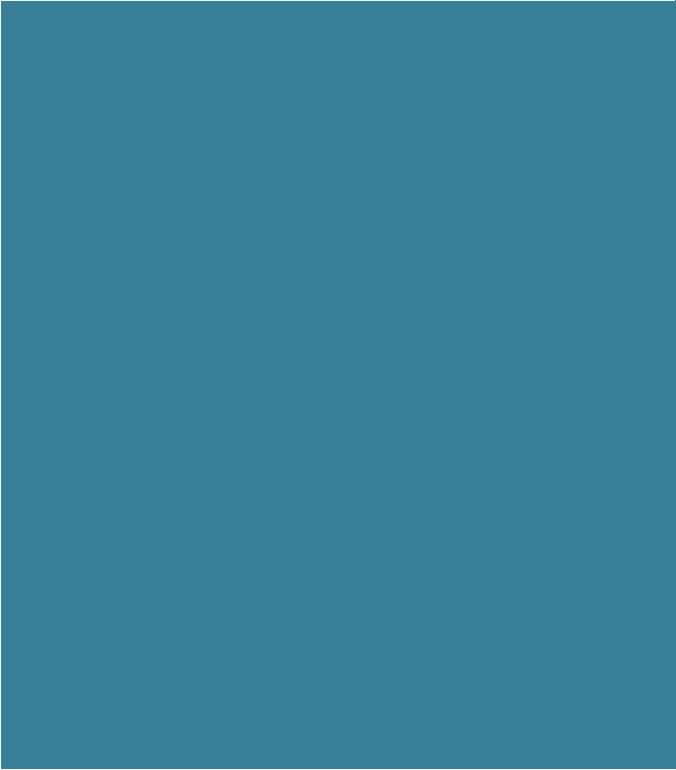
The purpose of an alternatives analysis is to examine reasonable and practicable options that avoid or reduce significant adverse impacts while still achieving the stated goals and objectives of the

proposed action. The specific alternatives to be analyzed are typically finalized as project impacts are clarified. A No Action Alternative (future without the Proposed Program) will be included in the DEIS. This analysis would be primarily qualitative, except where specific project impacts have been identified. Qualitative analysis would be of sufficient detail to allow comparisons of ~~associated environmental impacts and attainment of the City's initiatives~~ across alternatives of the short-term and long-term implementation considerations in order to meet DSNY's purpose and need for the Proposed Program.

3.14 Summary Chapters

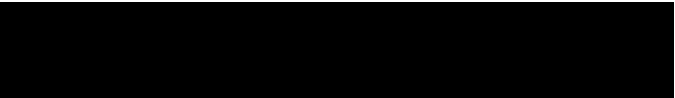
In accordance with the *CEQR Technical Manual*, the DEIS will include the following summary chapters, where appropriate, to the Proposed Program:

- **Executive Summary** – This section would describe the Proposed Program and summarize its potential for significant adverse environmental impacts, if any, and potential measures to mitigate those impacts, if required, and feasible alternatives to the Proposed Program.
- **Unavoidable Adverse Impacts** – This section would summarize unavoidable significant adverse impacts, if any, that could not be avoided or practicably mitigated resulting from the Proposed Program.
- **Growth Inducing-Aspects of the Proposed Action** – This section would focus on whether the Proposed Program would have the potential to induce new development within the City.
- **Effects on Disadvantaged CommunitiesEnvironmental Justice** – An environmental justice (EJ) analysis will be prepared to comply with New York State Environmental Conservation Law § 8-0109 and any relevant regulations or guidance in effect at the time of the DEIS preparation including disadvantaged communities (DACs). DACs are defined by the State as “communities that bear burdens of negative public health effects, environmental pollution, impacts of climate change, and possess certain socioeconomic criteria, or comprise high-concentrations of low- and moderate-income households.” In accordance with the State's guidance, this assessment will quantify GHG and co-pollutant emissions generated by the Proposed Program, to the extent possible, and provide a qualitative evaluation of whether the increase in emissions could increase existing burden on air quality and air-related health effects to a DAC. This assessment will determine the Proposed Program's potential to add a disproportionate pollution burden within an affected DAC that would be significantly greater than that same burden in comparable non-DAC, including a summary of any direct or indirect impacts on a DAC from new or modified noise sources, air pollutants, generation of odors, light pollution, radiation sources, or sources of solid waste.
- **Irreversible and Irretrievable Commitments of Resources** – This section would focus on those resources, if any, such as energy, that would be irretrievably committed should the Proposed Program be implemented.



A

Appendix A – Response to Comments



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A. Introduction

This appendix summarizes and responds to substantive comments received during the public comment period for the Draft Scope of Work (DSOW) for the Citywide Containerization Program. The DSOW was issued for public review by the New York City Department of Sanitation (DSNY) on September 17, 2025. A public meeting on the DSOW was held via Microsoft Teams on October 20, 2025 from 9 AM to 12PM and 1PM to 4 PM.

Section B lists the organizations and individuals that provided comments relevant to the DSOW. Section C contains a summary of these relevant comments and a response to each. These summaries convey the substance of the comments made but do not necessarily quote the comments verbatim. Comments are organized by subject matter and generally parallel the structure of the DSOW. Where more than one commenter expressed similar views, these comments have been grouped and addressed together.

B. List of Organizations and Individuals Who Commented on the DSOW

Elected Officials

1. Antonio Reynoso, Brooklyn Borough President, email dated October 30, 2025 (Reynoso_001)
2. Harvey Epstein, The Assembly of New York Albany Member, email dated October 30, 2025 (Epstein_002)

Organizations and Businesses

1. Claire Miflin, Executive Director, Center for Zero Waste Design, oral comment delivered October 20, 2025 and email dated October 21, 2025 (Miflin_003)
2. Stephen Smith, Executive Director, Center for Building in North America, oral comment delivered October 20, 2025 (Smith_004)

General Public

1. Jason Rabinowitz, oral comment delivered October 20, 2025 (Rabinowitz_005)
2. Randy Plemel, oral comment delivered October 20, 2025 (Plemel_006)
3. Yin Chang, oral comment delivered on October 20, 2025 (Chang_007)
4. Raphael Wakefield, oral comment delivered on October 20, 2025 (Wakefield_008)

C. Comments and Responses

PROJECT DESCRIPTION

Comment 1: DSOW Introduction: This section mentions that the Future of Trash report noted that containerization was viable in the City, without noting that the report recommended on-street containers for all waste streams, shared between buildings, and without noting that what DSNY are proposing is substantially different - trash-only containerization for individual buildings. (Miflin_003)

Response: The Future of Trash report assessed the applicability of various containerization models and the viability of containerization across the City, and concluded that containerization is viable. Through the prior small-scale assessment and lessons learned during the Manhattan CD 09 Pilot Program, DSNY developed its current implementation strategy for the Citywide Containerization Program.

Comment 2: We'd like to understand why only schools are using the recycling and composting stationary on-street containers, and not residences. I would recommend considering adding more stationary on-street containers for recycling and composting in residential areas. In addition to the numerous environmental benefits of composting, providing a space for citizens to dispose of their food scraps would reduce the amount of compost ending up in the garbage and on the street. We understand that they take up more curb space, but if collection frequency is increased, this would then be reduced. Will this be assessed? (Miflin_003)

Doing just trash only isn't the only way to get to clean streets and fewer rats, and if we do reduce diversion of the compostable waste compared to the alternatives, it will increase greenhouse gas emissions and public health effects. (Miflin_003)

Having recycling and compostable waste in larger containers rather than bags will also reduce truck standing time. (Miflin_003)

DSNY should also study an alternative that includes options for recycling and organics in shared bins, as is being proposed for schools and was outlined in the Future of Waste report. The DEIS Section 3.8 on Greenhouse Gas Emissions and Climate Change anticipates that "The Proposed Program... would not increase the generation of solid waste or change disposal technology or locations." It could, in fact, decrease the generation of solid waste by encouraging New Yorkers to separate more recycling and food waste from their trash. According to the Center for Zero Waste Design, "creating equally convenient waste drop off areas for trash, recycling, and

organic waste leads to higher diversion rates.” This could have a significant impact because food waste in landfill is the largest contributor to waste-related GHG emissions. Additionally, the program could change disposal locations by increasing diversion. When food scraps and recycling are processed locally rather than trucked to distant landfills, there is a positive impact on mobile GHG emissions that could offset some of the anticipated increase in vehicle miles traveled as a result of this program. Failing to include options for recycling and organics in shared bins is therefore counter to our codified goal of sending zero divertible waste to landfill by 2030 and DSNY should immediately reconsider its plan. (Reynoso_001)

Response:

In the evaluation of the Proposed Program, DSNY is not currently pursuing the containerization of all recyclables throughout the City to focus implementation of the containerization program and the benefits of containerizing most putrescibles, the most substantial waste stream. DSNY will evaluate potential alternatives for waste containerization, including alternative waste streams to be containerized and container sharing under the Proposed Program. However, based upon the volume of waste generated per residential unit, it would not be feasible to containerize all waste streams (refuse, organics, metal, glass, plastic, and cartons [MGPC] and paper/cardboard) throughout the City due to the significant number of incremental stationary on-street containers that would be required, which would in turn occupy a significantly higher number of parking spaces.

DSNY’s Proposed Program no longer proposes to use stationary on-street containers for all school waste. With the exception of existing or previously planned school stationary on-street containers for schools in Manhattan CD 09 and Brooklyn CD 02, schools throughout the City that receive DSNY waste collection services will continue to sort and containerize their refuse, recyclables, and organics through the use of existing waste containerization methods. This change is intended to focus the implementation of residential containerization through the use of stationary on-street containers for trash that is not already containerized.

It is noted that the Proposed Program is not anticipated to change current diversion rates. All applicable recycling and diversion laws and regulations remain in effect. Organics are already required to be containerized for collection and the City has installed 400 shared Smart Bin containers across the five boroughs where the public can dispose of their organics 24 hours a day, 7 days a week. The Citywide curbside organics program was the subject of a separate environmental review.

Comment 3: The containers should be City-owned, not associated with individual buildings. If you do it this way, you can have fewer bins and you can collect them more frequently at the same cost to DSNY. It improves sanitation by not having so much rotting trash sitting in the street. Personally, I am not supportive of on-street parking, but I know a lot of New Yorkers really like their on-street parking, and we all know it's very controversial to take away the spaces. So, if you have City-owned containers and you collect them more frequently, then you can take away fewer parking spaces. (Smith_004)

The bins probably shouldn't have to be something buildings purchase. They should be City-owned and given to buildings because some buildings are kind of strapped, either on the personnel side or just on the cash side to be able to buy the bins. (Rabinowitz_005)

I urge DSNY to model the economic impacts of these bins to assess if they should be City-owned property as a capital expenditure and not owned or cost-shifted onto owners or renters of specific individual homes. (Plemel_006)

Response: Stationary on-street containers are procured and maintained by the City. These containers are assigned to individual buildings based on the building's waste generation to ensure that each building has enough room in their bin to properly dispose of their waste. DSNY assessed the potential for shared containers in the DEIS Alternatives section, which identified significant challenges to convenience, usage, security factors, cleanliness, and maintenance costs. Separate containers also ensure proper accountability for complying with sanitation rules and diversion requirements. It is noted that Local Law 180 of 2025 authorizes DSNY to charge a fee of no more than \$55 per year to certain properties. The potential impacts of this fee, were it to be assessed, would be analyzed in a subsequent Technical Memorandum.

Comment 4: In the DSOW intro, it says the Proposed Program aligns with other City initiatives to create cleaner, more livable and more vibrant streets. How will this affect waste diversion? We believe if we create infrastructure and require containers and bins just for trash and not recycling and compostable waste, it may affect waste diversion. So, point number one is that this has to really analyze whether it affects waste diversion and also support city goals of increasing waste diversion and reducing the amount of refuse sent for disposal. (Miflin_003)

A smart containerization plan would also be tied to a save-as-you-throw model based on bin or bag size to help increase our diversion rates and meet our zero waste goals. This study presents an opportunity to explore options

for such a program, which would be in line with DSNY's goal, stated in the Draft 2026 Solid Waste Management Plan, to "study incentive-based waste management policies." (Reynoso_001)

Response: The Proposed Program is not anticipated to change current diversion rates. All buildings will still be required to follow all applicable recycling and diversion laws and regulations, including the proper separation and set out of Metal, glass, plastic and cartons (MGPC), Paper/cardboard, and Organics for weekly pickup.

Ensuring that compliance with well-established City rules regarding proper sorting for waste diversion was a major consideration of the current containerization strategy, and assigning containers to specific buildings allows the City to properly enforce the City waste diversion rules and regulations.

Comment 5: I just want to see if I can get some ideas or some information about how the city will ensure that the on-street bins will be located outside of the large apartment buildings actual street footprint and not outside of their neighboring buildings. I live next door to a 50-unit apartment building and I just want to make sure their containers don't end up outside of our building, which is not a large apartment building. (Chang_007)

Through the rollout, I recommend that the on-street containers be placed in a location that is convenient and accessible to residents. We must prioritize an easy user experience for residents utilizing these bins. (Epstein_002)

Response: The stationary on-street containers would be assigned to a building solely for the use of that building and every effort is made to place the containers in front of their respective property. Prior to the placement of the stationary on-street containers in a community district, DSNY would perform a detailed container siting evaluation for each building participating in the Proposed Program. Siting of the containers would be dependent on where the waste is typically removed from the building, existing curbside uses, container footprint, parking restrictions, as well as other factors to find the most convenient and feasible location in front of or near the participating building. Container siting would be performed in collaboration with the NYCDOT and NYCPS.

Stationary on-street containers would be locked, and access is limited to building staff and DSNY via agency-provided access cards to prevent the misuse of containers.

Comment 6: We must consider the impact of on-street containers on bike lanes, bus lanes, and open street programming. (Epstein_002)

- Response:** DSNY would work with NYCDOT on the specific placement of the stationary on-street containers, as needed. Containers would not be placed in bike lanes or bus lanes. Container placement will take into account roadway cafe locations currently permitted through the NYCDOT Outdoor Dining program. The placement of stationary containers will be discussed in the DEIS.
- Comment 7:** DSNY's 2023 Future of Trash report states that "containerization is not a one-size-fits-all solution." It recommends a block-by-block approach for determining the appropriate method of containerization, considering elements such as available curb space, anticipated waste output, and street width. Yet DSNY has instead chosen an approach based solely on building size. (Reynoso_001)
- Response:** DSNY recognizes that "containerization is not a one-size-fits-all solution." As such, an assessment was performed to determine which buildings should be containerized and the type of containers (individual bins or stationary on-street containers) that should be utilized for each building based on the volume of waste anticipated for that building. DSNY provided buildings with 10 to 30 residential units the option to choose whether stationary on-street containers or individual bins would be more appropriate for their building's needs.
- Comment 8:** Implementation of this program must be rolled out along a rapid timeline. The current proposal aims for full implementation by June 1, 2032, nearly seven years from now. It is crucial to solidify and implement containerization as soon as possible. (Epstein_002)
- Response:** Implementation of the Citywide Containerization Program would occur in phases with the next installation in Brooklyn CD 02 and full implementation is anticipated by June 2032. This timeline reflects DSNY's commitment to extensive outreach and proper siting of stationary on-street containers Citywide to ensure the long-term success of the Proposed Program.
- Comment 9:** The report notes that "Based upon the learnings and successful implementation of the Manhattan CD 09 Pilot Program and to expand upon the current residential waste containerization program described in Section 1.1.2, DSNY is proposing the Citywide Containerization Program." No learnings have been shared by DSNY, and it would be helpful for us and others to see what DSNY's findings were. Can this information be shared? (Mifflin_003)
- Response:** The learnings of the Manhattan CD 09 Pilot Program will be included in the DEIS and inform the implementation of the Proposed Program.

PUBLIC POLICY

Comment 10: DSOW Section 3.1 Public Policy: The amount of truck traffic and their emissions should also be considered as reducing them is also a public policy goal. (Miflin_003)

I would love to know the learnings from the pilot, which haven't been shared publicly. It would be good to understand what DSNY learned from the pilot as the DSOW refers to that they are building upon it. I would like to see how it affects public policy for one, and how is it going to affect those zero waste goals and the Zero Waste Act. There's public policy and there's also waste diversion goals within PlaNYC and getting sustainability done. (Miflin_003)

Response: As noted in the DSOW, the DEIS will include a discussion of the Proposed Program's compliance with waste diversion and public policy goals, as laid out in PlaNYC: Getting Sustainability Done and the City's Solid Waste Management Plan. The learnings of the Manhattan CD 09 Pilot Program will be included in the DEIS.

Comment 11: DSOW Section 3.1 Public Policy: SWMP, PlaNYC and Getting Sustainability Done all have waste diversion goals, so the plan and alternatives should be assessed to determine which helps the city divert more waste. Our expectation is that trash only infrastructure will hinder the city from diverting more waste, as it has shown to do that in the past - for example in NYCHA housing which has trash chutes in buildings and exterior recycling bins. (Miflin_003)

Response: The Proposed Program is not anticipated to change current diversion rates. All applicable recycling and diversion laws and regulations remain in effect. Ensuring that compliance with well-established City rules regarding waste diversion was a major consideration of the current containerization strategy. Assigning containers to specific buildings allows the City to properly enforce the City's waste diversion rules and regulations.

Comment 12: DSOW Section 3.1 Public Policy: The NYC Curb Management Plan looks to have efficient use of the curb, and only use the street when it is for public benefit. So the plans and alternatives should be assessed for how much curb access and street space they take up, and for how long. Our alternative 4-wheeled bin solution for large buildings uses less curb space temporarily, and should be assessed against permanent Empire Bins [stationary on-street containers] for large buildings. (Miflin_003)

Response: The length of curb that will be used by the stationary on-street containers will be discussed in the DEIS. Wheeled containers (4-wheeled bins) will be discussed in the DEIS Alternatives section.

SOCIOECONOMICS

Comment 13: DSOW Section 3.1 Public Policy: Equity is also part of public policy. DSNY's solution of stationary on-street containers and individual bins maintained by property owners should be assessed against our solution of shared stationary on-street containers maintained by DSNY, which we believe is more equitable, as it means that lower-resourced buildings and lower-resourced neighborhoods don't suffer from dirtier streets. For large buildings our 4-wheeled bin solution requires no on-street maintenance. (Miflin_003)

DSOW Section 3.2 Socioeconomics: Residential displacement comes with increased rents. Our solutions lead to lower operating costs, which we have an upcoming report showing average around \$75 / dwelling unit / month just for managing waste in the building and setting it out. Our shared stationary on-street container solution for small to medium sized buildings, which are used directly by residents, removes that cost burden from buildings and therefore reduces operating costs and allows for lower rents. Our large building solution also reduces operating costs and improves labor conditions. (Miflin_003)

Response: The costs associated with the Proposed Program will be discussed in the DEIS Socioeconomics section.

Shared containers will be discussed in the DEIS Alternatives section.

Comment 14: DSOW Section 3.2 Socioeconomics: Any change in rates of recovery of recycling and compostable materials should be assessed as this will affect the recycling and composting industry. (Miflin_003)

Response: The Proposed Program is not anticipated to change current diversion rates. Buildings will still be required to properly sort and separate waste in accordance with all applicable recycling and diversion laws and regulations.

Comment 15: Something that should be generally considered is that the cost for private owners to move their trash from the building to the curb is very substantial and likely far exceeds the cost for DSNY to actually collect the trash and take it to the dump. Operating costs are a very major issue for New York City's affordable housing stock, or New York City's entire housing stock, including affordable housing and rent stabilized buildings. The current method is extremely labor intensive. Supers need to take trash out. Then they need to come back, and with these new rules about bins and containerization, they need to come back out, move the bin inside. This ends up being about six trips to a building per week. For a very large building with onsite staff, it's not the worst in the world. But for a small building like my own seven unit condo

building, the amount of time spent just traveling to and from the building is just extraordinary. Our costs per unit per month exceed \$100 a month to take the trash out and then bringing the bins back in. So, this pilot program, I think, begins to bring down these costs by limiting the return trips. If a building chooses to take advantage, or is forced to take advantage, of the on-street containers, then they don't have to bring the bins back in, which cuts about half the trips. You're still requiring buildings to collect trash in the building and then have a super take it out. We put our trash there and then we have to pay these supers and porters to come three times a week to take the trash out and another three times a week to bring it in. (Smith_004)

Response: Property Owners are responsible for ensuring that their building's waste is separated and set out in accordance with DSNY rules for collection. The handing of waste by individual buildings, such as other bins for collection prior to deposition into stationary on-street containers, employment of porters/superintendents, inclusion of trash collection rooms, is not under the purview of this environmental review.

Additionally, properties utilizing stationary on-street containers may set out waste in the containers at any time and are not required to hold waste indoors or set waste out at any specified times.

Comment 16: These bins are very reminiscent of what you find around the Mediterranean, Europe (Spain and Italy) and a lot of other countries around the world, but the major difference is, you guys are not dis-intermediating the buildings from it. It's very expensive. Operating costs in New York for housing are far in excess of what you find in the United States and can be much, much higher, almost an order of magnitude higher in some cases than what you'd find in Europe, and one of the major reasons is that we sort of force this sort of trash concierge service. I realize this would take a lot of re-looking at housing maintenance code and other codes that force trash to be stored onsite, but it is worth doing at some point because the costs are just very high. It's becoming very expensive and very difficult to find porters and supers. As the City is getting more expensive, finding the sort of low wage work is low wage workers is getting harder and harder. I think DSNY should include having the containers be City-owned, not associated with individual buildings, and then eventually having residents take their trash out to them directly, having the buildings out of the whole process. It saves on operating costs for the buildings, and for new construction, it saves on capital costs. The cost to store trash, space in basements is incredibly expensive. The shafts are very expensive. They pose fire safety concerns. There are huge accessibility issues with the trash rooms on every floor. (Smith_004)

Response: Property Owners are held responsible for ensuring that their building's waste is separated and set out in accordance with DSNY rules for collection. The handing of waste by individual buildings, such as other bins for collection prior to deposition into stationary containers, employment of porters/superintendents, inclusion of trash collection rooms, is not under the purview of this environmental review.

Comment 17: DSOW Section 3.2 Socioeconomics: DSNY's stationary on-street container solution also leads to bins on sidewalks being used by residents, before the waste is moved into the Empire Bin [stationary on-street containers] on the street, and bins permanently in front of sidewalks. (Miflin_003)

DSOW Section 3.2 Socioeconomics: Bins permanently on sidewalks in front of storefronts affect those storefront businesses. DSNY's individual bin solution allows bins in the 3' zone in front of storefronts, but in practice many of these bins are chained up within the furnishing lane. DSNY's stationary on-street container solution also leads to bins on sidewalks being used by residents, before the waste is moved into the Empire Bin [stationary on-street containers] on the street, and bins permanently in front of sidewalks. (Miflin_003)

Response: The handing of waste by individual buildings, such as other bins for collection prior to deposition into stationary containers, is not under the purview of this environmental review. However, buildings with residential units that use individual bins are required to meet DSNY's Rules regarding "Requirements for Receptacles and Bags Containing Solid Waste and Recyclables for Collection" (Section 1-02.1 of Title 16 of the rules of the City of New York), summarized below:

- Receptacles (Individual bins) must be kept clean and in good repair; and
- If other storage areas on the premises are not available, receptacles may be stored in the area within three feet of the building line on the sidewalk, provided that such receptacles are maintained in an orderly manner and do not impede or obstruct pedestrian flow on the sidewalk.

URBAN DESIGN & VISUAL RESOURCES

Comment 18: DSOW Section 3.4 Urban Design and Visual Resources: It is clear to any New Yorker that notices and values public space that DSNY's bin mandate for 1-9 unit residential buildings citywide as well as for commercial businesses has had a major impact on sidewalk experience. Bins tied to trees, lamp posts,

DOT poles or lining the building line of the sidewalk, or scattered across the sidewalk after collection have a major negative impact on the sidewalk experience. Note that not only the bins from 1-9 unit or 10-30 unit buildings should be assessed, but also those from larger 30+ unit buildings with stationary on-street containers. In our experience viewing CD9 stationary on-street containers pilot, many buildings with stationary on-street containers also have permanent bins on sidewalks for trash, recycling and compostable waste used by residents. The porters empty and take the trash over to the stationary on-street containers which is only for use by building management. The effect on public space should be assessed in comparison to our alternatives which would not result in any permanent bins for residential trash, recycling or compostable waste stationed on sidewalks, nor have empty bins scattered across the street after emptying. All waste would be within the curb lane, either directly accessed by residents, or in 4-wheeled bins set out by building staff. (Miflin_003)

Nearly 20% of one-to-nine-unit buildings in NYC have storefronts on the ground floor, and neither the residential nor commercial tenants have anywhere to store their wheelie bins. As a result, wheelie bins have already become permanent fixtures on our sidewalks, blocking storefronts and ground floor windows while obstructing pedestrian walkways. (Reynoso_001)

Should residential buildings with 10-30 units opt to use individual bins, ensure there is enough space on the sidewalk for neighbors to walk, including those utilizing strollers and assistive mobility devices. (Epstein_002)

Response:

The handing of waste by individual buildings, such as other bins for collection prior to deposition into stationary on-street containers, is not under the purview of this environmental review. However, buildings with residential units that use individual bins are required to meet DSNY's Rules regarding "Requirements for Receptacles and Bags Containing Solid Waste and Recyclables for Collection" (Section 1-02.1 of Title 16 of the rules of the City of New York).

Comment 19:

I note that sidewalks are still going to have bins of the compostable waste and recycling bags on the sidewalk, even if all waste is in an Empire bin [stationary on-street containers]. But in many cases, residents are using bins on the sidewalk and then the trash is being moved to the Empire bin. So, I think the impact of those bins on the sidewalks needs to be thought through and that has to be thought through thoroughly in the urban design section. So, not only the bins that have been collected, but the bins that are being used by residents before the porter moves the trash to the Empire bin. (Miflin_003)

Response: The handling of waste by individual buildings before placement in a stationary on-street container or an individual bin is not under the purview of this environmental review.

SOLID WASTE

Comment 20: DSOW Section 3.5 Solid Waste: The proposal should be assessed against current practice and our alternatives to see if it will affect diversion rates as this has an impact on the Solid Waste Management Plan SWMP which has aims to increase diversion rates. Our belief, born out by historical trash-only infrastructure, is that trash-only infrastructure - bins and stationary on-street containers - will reduce rather than increase diversion rates. (Miflin_003)

Response: The Proposed Program is not anticipated to change current diversion rates. Ensuring compliance with well-established City rules regarding waste diversion was a major consideration of the current containerization strategy. Assigning containers to specific buildings allows the City to properly enforce the City's waste diversion rules and regulations. All properties must continue to follow all applicable recycling and diversion laws and regulations.

GREENHOUSE GAS EMISSIONS

Comment 21: The amount of truck traffic and their emissions should also be considered as reducing them is also a public policy goal. Our suggestion of shared on-street containers for smaller buildings is much more efficient to collect, requiring less truck standing time than the individual bins required by DSNY for 1-9 unit buildings and optional for 10-30 unit buildings. (Miflin_003)

Response: The incremental collection truck traffic due to the Proposed Program and their emissions will be assessed in the DEIS.

Comment 22: DSOW Section 3.6 Greenhouse Gas Emissions and Climate Change: The emissions from food waste in landfills is substantial, and any reduction of diversion compared with alternatives should be assessed. (Miflin_003)

Response: The Citywide curbside organics program, requiring organics to be placed out on the curb in containers, was the subject of a separate environmental review. Assigning stationary on-street containers to specific buildings allows the City to properly enforce the City's waste diversion rules and regulations.

Comment 23: DSOW Section 3.6 Greenhouse Gas Emissions and Climate Change: Vehicle Miles Traveled affects GHG emissions so alternatives should be assessed in terms of route efficiencies and truck miles. (Miflin_003)

Response: Vehicle Miles Traveled (VMTs) will be assessed in the DEIS for the Proposed Program based on current DSNY routes.

TRANSPORTATION

Comment 24: DSOW Section 3.7 Transportation: We also think that the prototypical areas do not include areas with newer high rise residential buildings, where there may be more effect on parking. We'd suggest that an area like Lafayette Street and Flatbush Ave in Downtown Brooklyn or Fulton Street and John Street in Manhattan be added. (Miflin_003)

Response: New high-rise residential buildings must comply with the NYC zoning regulations for residential parking supply. In coordination with NYCDOT, DSNY selected prototypical areas that are distributed and representative of the typical existing conditions throughout the City in areas with buildings that would be affected by the Proposed Program to assess the potential effects of the Proposed Program on parking consistent with CEQR.

PUBLIC HEALTH

Comment 25: The compostable waste that attracts the rats, not the trash. (Miflin_003)

Response: Organics are already required to be placed out at the curb in containers. While curbside composting is mandatory, it remains a relatively new program. As a result, a substantial amount of putrescible waste is still included in trash set out by larger buildings in bags for collection.

ENVIRONMENTAL JUSTICE

Comment 26: DSOW Section 3.14 Summary Chapters: An environmental justice analysis should look at the increased truck traffic from trash trucks to waste transfer stations which would be caused by a lowering of diversion rates. (Miflin_003)

Response: As stated in DSOW, an environmental justice analysis will be performed as part of the DEIS. It is noted that the Proposed Program is not anticipated to change current diversion rates.

ALTERNATIVES

Comment 27: You should just have the residents take the trash out directly. New York City has long had a tradition of buildings handling the trash. So, I would encourage you to get closer and closer to the European or global models and dis-intermediate the buildings entirely and have residents take the trash out directly. (Smith_004)

DSOW Section 3.7 Transportation: The assessment of parking analysis needs to look at solutions which are more curb efficient as we believe our solutions to be. (Miflin_003)

We fully support DSNY's goals to get rid of bags of trash piled up on sidewalks and instead move to a system where waste is collected from bins and containers by mechanized trucks. But we have concerns about the way DSNY is moving forward with waste containerization and believe it could be more strongly aligned with the City's goals of improving waste diversion, pedestrian mobility and the quality of the public realm. We recently released a report on Containerization, which outlines alternatives to DSNY's plans which would allow waste containerization to improve streetscapes and labor, at lower cost, and would help the City reach waste reduction and climate goals. We strongly recommend that our alternatives will be considered in the draft scope of work. (Miflin_003)

DSOW Section 3.13 Alternatives: Alternative solutions should include the two proposed by the Center for Zero Waste Design and supported by many public space advocates, for more details see their Containerization Report. We strongly recommend that our alternatives will be considered in the draft scope of work, such as shared on-street containers. We believe these alternatives would increase waste diversion, reduce the curb space used up, clear up sidewalks from permanently staged bins, improve labor and reduce operating costs for building owners. I would also like to point out to the Department of Sanitation could look at Hoboken, New Jersey current pilot.

- Shared on-street containers for all waste types accessed directly by residents for small-mid size buildings.
- Temporarily staged 4-wheeled containers for all waste streams for large buildings with chutes and wheeled access to the street, as currently being piloted in Hoboken, NJ. (Miflin_003)

Response: Alternatives for waste containerization will be evaluated in the DEIS based on the Future of Trash report and lessons learned through implementation of the Manhattan CD 09 Pilot Program.

Comment 28: Our suggestion of shared on-street containers for smaller buildings is much more efficient to collect, requiring less truck standing time than the individual bins required by DSNY for 1-9 unit buildings and optional for 10-30 unit buildings. (Miflin_003)

DSNY should consider an alternative that utilizes a geographic approach allowing residential buildings of all sizes to use on-street containers where appropriate (shared between buildings as needed), especially in mixed-use commercial corridors, with the option for residences and businesses in these areas to use shared bins. (Reyonso_001)

I generally support trash containerization, but it's important that these containers be shared between buildings and not necessarily every single

building. In fact, I'm not really sure how it's going to work on a practical level given how densely packed many buildings are together to each other, especially in Manhattan, but also here in Queens. It just makes much more sense to have containers for a single block and this is not hypothetical for me because I actually in Phipps Gardens Complex, where we already have, essentially, common containers and two common trash points on our whole block that our complex occupies and it works. People, including myself, carry the trash out to the deposit point. The problem is the trash is not well secured. The rats still get in it and if we just did that, but with a sealed container, that would be amazing. I think that would be a massive step forward. So, kudos to you for working on this, but we don't need so many containers. (Wakefield_008)

The report also suggests allowing buildings to share on-street containers, something that is not considered here. This is particularly important for mixed-use corridors. (Reynoso_001)

Response: Shared containers will be discussed and assessed in the DEIS Alternatives section.

STATEMENTS OF SUPPORT

Comment 29: I am very happy that the City is going forward with containerization. (Mifflin_003)

I just wanted to provide support for the proposal of the trash containerization pilot. I'm a resident of Brooklyn CB 2, and I actually happen to just wander by the installation of the Empire bins [stationary on-street containers] outside of Brooklyn Tech High School, and I can say it's already making a big improvement to the neighborhood since trash will now go in the container instead of thrown onto the sidewalk on the sidewalk in front of the biggest high school in the country, which obviously sees a ton of pedestrian movement. So, getting that trash off the sidewalk into the car lane in containerized bins, I think is a great idea. Even if we have to take a few parking spaces to do it, especially in dense neighborhoods like downtown Brooklyn or Fort Greene in CB 2 in Brooklyn, I think this is an overwhelmingly positive idea that we are decades late to doing and providing full support in this commentary. (Rabinowitz_005)

I'm testifying today in support of the containerization program to hopefully go citywide. We all know that there's limited amount of public realm and streetscape in our City, but I believe the pilot has shown that stationary on-street containerization of sanitation and waste are a better use of our streetscape to keep us clean and safe. (Plemel_006)

I support this general idea. (Chang_007)

Containerization reduces the prevalence of rodents on our streets and improves the quality of life for residents. The Manhattan CD-9 Pilot Program saw a reduction of rat sighting calls to 311 by 60%. (Epstein_002)

In general, I am very, very supportive of containerization efforts. It is overkill to do all this research about historic districts, and socioeconomic impacts, and things like this. I wish you could spend a little more time on the actual policy, rather than having to drill this box checking. (Smith_004)

Response:

DSNY has prioritized containerization as part of its approach to keeping New York City clean. The Citywide Containerization Program would allow DSNY to support the City's commitment to street cleanliness and reducing potential food sources for vectors.