



**DSNY rules hearing  
4.13.21**

Good Morning. Thank you for the opportunity to testify. My name is Phoebe Flaherty, I'm an Organizer at ALIGN: The Alliance for a Greater New York. ALIGN is a community-labor coalition dedicated to creating good jobs, vibrant communities, and an accountable democracy for all New Yorkers.

We coordinate the Transform Dont Trash coalition, a coalition of environmental justice groups, labor, climate and street safety organizations working towards reforming the way commercial waste is collected in New York City. We worked with the City Council to pass Commercial Waste Zones, Local Law 199.

The implementation of Commercial Waste Zones is essential to reducing New York's GHG emissions through reducing truck miles and increasing recycling and organics collection, to creating good green jobs, and to making our streets safer and cleaner. We are very pleased to see the process moving forward and the second round of rules being established with public input.

We know that, though truck miles have decreased, this year has still been the deadliest for waste collection collisions. We need safer vehicles and more training for workers. For the most part, we are happy to see these changes reflected in the safety rules.

There are some instances where more training should be required, however. In addition to the annual training required for workers, there should be a pre-training program for drivers before they start work on trucks, and a significant training program for helpers.

We'd like to address a few other specific areas within the Commercial Waste Zone rules as well:

- Regarding section 20-51 b.6: In addition to this rule prohibiting workers from riding on the back of the truck, there should be an additional rule to remove the rear step from the back of the truck to physically prevent people from riding there, such as what has occurred with DSNY trucks.
- Regarding section 20-52 4.b: In addition to this requirement, if someone is forced to operate an unsafe truck there must be a way to report it to the city and immediate action should be taken by the city.
- Regarding section 20-57 requiring a cab-over truck design: This rule should be reconsidered as it offers less protection between drivers and the road and can be more risky for drivers during an accident.

Overall we are please with the second round of rules but ask that you incorporate the above feedback which we believe will lead to greater safety for workers and pedestrians and cyclists in New York City.

Thank you for your time and dedication to this process.

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