

Ethan Krantz

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DATE: November 3, 2022

FROM: Ethan Krantz

TO: DSNY, nycrules@dsnyc.nyc.gov 125 Worth Street, Room 710 New York, New York 10013

RE: Time for Placing Solid Waste and Recyclable Materials Out at the Curb for Collection

To whom it may concern,

The Department of Sanitation and Mayor Adams worked together to propose a change to the pickup procedures on New York City Streets.¹ This comment supports the goal but not the method. I live in Manhattan and see garbage on the streets and sidewalk every day. DSNY is not to blame. The sanitation department has the hardest workers in the city picking up garbage at all hours but there is a ton of garbage. The proposed rule creates complicated timeline changes restricting placement during the timeframe of after 6:00 until midnight before the scheduled pickup.²

Point 1-Cost to Businesses

The proposed rule will increase costs to businesses. By delineating between secure and bulk bags, small businesses will have to spend thousands of dollars on different strategies for placing out garbage in “secure containers” or pay custodial staff to be on site for extended hours. Currently, businesses put out bags as they close up but will only be able to do that if they do so in a secure container. IF not, bags will have to be out after 8:00.

¹ Mayor Adams, Sanitation Commissioner Tisch Announce Drastically Reduced Hours Trash Will sit on NYC Streets (October 17, 2022) [<https://perma.cc/JVQ5-8WCC>].

² New York City Department of Sanitation Notice of Public Hearing and Opportunity to Comment on Proposed Rules [<https://perma.cc/NY8F-U3MW>].

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Point 2 Secure Container Ambiguity

The proposed rule does not give any guidance as to what a secure container or lid is. Will citations be issued to businesses who do not have the lid on the container? I walk down the street and see people opening up people's trash to look for recyclable products or things of value. I have no issue with that but people should not be fined if someone else removes a lid. This is very difficult to implement.

Alternate Idea

The City could investigate if certain areas of the city are more at risk for garbage on the street and sidewalk. The city can put out a list of approved secure lids.

Please feel free to contact if you have questions
about this comment,

Respectfully submitted,

Ethan

