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To,  
Department of Sanitation,  
New York, NY 10013.

Subject: Source separation of yard waste and the allowance for the commingling of organic waste with source-separated yard waste.

I am writing to express my support for your proposal to amend the rules regarding residential collection of designated recyclable materials. Specifically, I support the requirement for source separation of yard waste and the allowance for the commingling of organic waste with source-separated yard waste. As a graduate student pursuing M.Sc. in Sustainable Environmental Systems (at Pratt Institute, Brooklyn, New York) and a concerned resident, I believe that it is important for us to take proactive measures to reduce our environmental impact and address climate change. The proposed rule changes are an important step in this direction, as they will help to reduce the amount of organic waste that ends up in landfills and promote the use of composting and other sustainable waste management practices.

In 2018 alone, over 292 million tons of municipal solid waste was generated in the United States, which is equivalent to 4.9 pounds per person per day<sup>1</sup>. This staggering amount of waste has serious environmental consequences, including greenhouse gas emissions and the depletion of natural resources. Yard waste is a significant source of organic material that can be composted and used to enrich soil and promote plant growth. By requiring source separation of yard waste, we can ensure that this valuable resource is not wasted and is instead put to good use. Yard trimmings constituted 12.1% of the total MSW generated and had the highest composting rate of all product categories at 63%<sup>1</sup>. Additionally, separating yard waste from other types of waste will make it easier for DSNY to process and manage this material in a sustainable and efficient way.

<sup>1</sup> *Advancing sustainable materials management: 2018 fact sheet assessing trends in materials generation and management in the United States.* (2020). Epa.gov.  
[https://www.epa.gov/sites/default/files/2021-01/documents/2018\\_ff\\_fact\\_sheet\\_dec\\_2020\\_fnl\\_508.pdf](https://www.epa.gov/sites/default/files/2021-01/documents/2018_ff_fact_sheet_dec_2020_fnl_508.pdf)

Commingling organic waste with yard waste will increase the amount of organic material available for composting, which will help to reduce the amount of organic waste that ends up in landfills. Organic waste that ends up in landfills produces methane, a potent greenhouse gas that contributes to climate change. MSW landfills are the third-largest source of methane emissions in the United States accounting for approximately 14.3% of these emissions in 2021<sup>2</sup>. By composting organic waste instead of sending it to landfills, we can reduce our carbon footprint and promote more sustainable waste management practices. Moreover, allowing for the commingling of organic waste with yard waste will also make it easier for residents to participate in sustainable waste management practices. Separating different types of waste can be confusing and time-consuming for many residents, and may discourage them from participating in composting and other sustainable waste management practices. By allowing for the commingling it can make it easier for residents to participate in these practices and promote more widespread adoption of sustainable waste management practices. Education and awareness sessions before the implementation will help residents to understand the rule and segregation of their waste.

In conclusion, I want to reiterate my support for your proposal to amend the rules regarding residential collection of designated recyclable materials. The requirement for source separation of yard waste and the allowance for the commingling of organic waste with source-separated yard waste are important steps in promoting more sustainable waste management practices and reducing our environmental impact. I would like you to move forward with these rule changes and to continue to explore other ways to promote sustainable waste management practices and reduce our carbon footprint.

Thank you for your attention to this matter, and for your continued efforts to promote sustainable waste management practices.

Sincerely,  
Bansri Makadiya

<sup>2</sup> *United States Environmental Protection Agency - Landfill Methane Outreach Program*  
<https://www.epa.gov/lmop/frequent-questions-about-landfill-gas>