

In Re Initial Zone Rule for Commercial Waste Zones Public Hearing
NYC - Department of Sanitation
March 25, 2024

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PUBLIC HEARING
NYC Department of Sanitation
Initial Zone Rule for Commercial Waste Zones

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March 25, 2024
10:04 a.m.

PUBLIC HEARING
Held Virtually via Microsoft Teams

Recorded by:
Stephanie O'Keefe, Court Reporter

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MS. LIGUORI: Good morning and welcome. My name is Madelynn Liguori. I am Senior Counsel in the Bureau of Legal Affairs for the Department of Sanitation. Thank you for attending this public hearing this morning.

DSNY is conducting this remote hearing in accordance with the requirements of the City Administrative Procedure Act. The purpose of this hearing is to receive comments from the public on DSNY's proposed rule relating to DSNY's initial zone rule for commercial waste zones.

This rule was initially published by DSNY in the City Record on January 30, 2024, with a scheduled hearing date of March 7, 2024. Since the initial publication, DSNY received a request to switch the virtual platform for the hearing from WebEx to Teams for accessibility reasons. As a result, DSNY re-published the rule in the City Record on February 22, 2024, with a scheduled hearing date of today. Additionally, DSNY emailed copies of this rule to all New York City local elected officials, the City's fifty-nine community boards, media

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and interested parties, and published the proposed rule on its website.

In 2019, New York City enacted Local Law 199, requiring the establishment of a new program for the collection of commercial waste. The program, known as the Commercial Waste Zones Program, is a safe, efficient, and competitive collection system designed to provide high-quality service to New York City businesses while advancing the City's waste diversion and sustainability goals. Pursuant to Local Law 199, codified in Title 16-B of the New York City Administrative Code, the geographic area of New York City has been divided into 20 commercial waste zones.

Pursuant to a request for proposals process, three private carters were selected by the Department to serve businesses within each commercial waste zone, for a total of 18 carters selected for 20 zones. Additionally, five carters were selected to provide containerized commercial waste collection services from dumpsters and compactors citywide. The selected carters are referred to

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as "awardees." The resulting contracts with the awardees include standards for pricing, customer service, safety, environmental health, and requirements to promote the City's commitment to recycling and sustainability.

Local Law 199 requires the Department to promulgate rules setting forth an implementation start date and a final implementation start date for each commercial waste zone established pursuant to section 16-1001. Different implementation start dates and implementation end dates may be established for different commercial waste zones. See administrative Code 16-1002(e)(3). This rule sets the implementation start date and final implementation date only for the first commercial waste zone to be implemented - Queens Central. Subsequent rules will set the implementation dates for the zones being implemented later.

DSNY's authority for these rules is found in Section 753 and Section 1043(g) of the New York City Charter and Title 16-B of the New York City Administrative Code.

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Please note that this hearing only relates to the proposed rule that designates the first commercial waste zone to be implemented as Queens Central. It does not address any other topic with respect to commercial waste zones. We ask that oral statements and written comments be directed to the limited subject matter of the proposed rule.

A court reporter is present today and will record the hearing. You may present an oral statement or submit written comments concerning the proposed rule. We have been accepting written comments on the proposed rule since it was published. Today is the deadline for submission of written comments. Such comments may be emailed directly to nycrules@dsny.nyc.gov by 5:00 p.m. today.

DSNY will make available a copy of all written comments received through today, together with the hearing transcript, for viewing on its website within the next two weeks.

DSNY will carefully consider all the comments it receives today at the hearing and

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all written comments it receives.

I will begin calling those of you who wish to speak this morning in the order in which you have signed up to testify. While the notice requested that persons wishing to testify sign up in advance of this hearing, anyone wishing to testify at this time may do so by indicating in the chat area that you wish to testify by indicating your name and affiliation, if any. When you speak, please state your name and affiliation, and speak slowly and clearly so that the court reporter can understand and accurately record your statement. We also ask that you limit your statement to five minutes.

I would first like to call Alex Veman to testify.

MR. VEMAN: Yes, hello. Thank you and good morning.

I have already met some people from the BIC team who have come to my place of work and we have discussed technology, improvements; however, from DSNY, I have not had any meetings, so I'm not sure who everyone is with DSNY.

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But I have been asked to share my testimony. I don't know who your customers are, who resides within your area of service. I do, however, know what is available publicly.

One thing that bothers me is that I'm not sure of the --

THE INTERPRETER: I'm sorry, for the interpreter, the tech has frozen a little bit.

MR. VEMAN: There are violations.

THE INTERPRETER: I'm sorry, this is the interpreter, I'm having quality issues, can we switch to the other interpreter in case their internet is more clear.

Thank you. I'm going to restart and join again. Thank you.

MR. VEMAN: It's okay.

I don't know about the company specifically, but many of the violations, my company has not had; others, I'm unsure about. We keep everything clean, again, zero violations. However, there are other vendors that do have violations, but going against our specific company is wrong because due to the acquisition and the eminency, I would like it

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to stay small and keep no issues on our streets, and opening it up would cause a lot of issues. Smaller or medium-sized companies is how it should be kept, in order for quality control purposes.

If we have companies that have over a thousand people, that is going to affect the quality over time for sure.

Thank you. Thank you for your time.

MS. LIGUORI: Thank you so much, Mr. Veman, for your testimony.

I would now like to call Eric Goldstein, Senior Attorney and NYC Environment Director for the National (sic) Resources Defense Council. Eric.

MR. GOLDSTEIN: Good morning, everyone. My name is Eric Goldstein, New York City Environment Director at the Natural Resources Defense Council.

NRDC has been active for decades on New York solid waste issues. Our longterm goal has been to advocate for the transformation of New York's waste policy from primary reliance on landfilling and incineration, to making waste

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prevention, composting, recycling, and equity the cornerstones of city solid waste policy in the 21st Century.

The City Council's passage of Local Law 199 of 2019 was a historic step forward. It was designed to bring about widespread improvements in the irrational, pollution-generating, worker-mistreating, safety-minimizing system of commercial waste handling that has defied solution for decades. And if successfully implemented, this new waste zone system will usher in a new era of public safety, worker fairness, and sustainable waste disposal in the nation's largest city.

NRDC supports the proposed rule that the Department of Sanitation is advancing today, which establishes a start date of 9/3/24 and a final implementation date of two 2/20/2025 (sic) for the first waste zone in Queens Central Zone.

Of course, successful implementation of the Local Law 199 mandate in all 20 zones will be key to achieving the full and lasting benefits envisioned by the City Council. We

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have three recommendations for the Department as it continues to move forward with its waste zone implementation.

First, we urge the Department to make public its criteria for assessing the effectiveness of the implementation of the first waste zone and to provide New Yorkers with updates on startup successes and challenges and how they are being addressed in the phase-in period.

Second, we hope the Department will propose in the near future another rule setting forth the implementation schedule for the remaining 19 zones, one that provides for the start up all 20 zones, no later than December 2025. We would also welcome a report by the Department, explaining the basis for the selection of the contractors for 20 zones, and how that conforms with Local Law 199.

Finally, we urge the Department to analyze how it can use the rebuilt marine transfer stations to accommodate commercial waste, as was originally envisioned in the 2006 Solid Waste Management Plan.

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2 Thank you for your attention and for
3 advancing this proposed rule today.

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MS. LIGUORI: Thank you very much for your
5 testimony. I would now like to call Alia
6 Soomro from the New York League of Conservation
7 Voters.

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MS. SOMRO: Hi, good morning. My name is
9 Alia Soomro, and I'm the deputy director for
10 New York City policy at the New York League of
11 Conservation Voters. Thank you for the
12 opportunity to testify.

13

NYLCV strongly supported the passage of
14 Local Law 199 of 2019, establishing the City's
15 first commercial waste zones program.
16 Championed by a wide group of stakeholders, if
17 implemented effectively, this law will overhaul
18 the City's antiquated and inefficient
19 commercial waste management system by dividing
20 the City into 20 zones, limiting each zone to a
21 maximum of three private sanitation companies,
22 selected through a competitive bid process and
23 holding companies to a higher standard.

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NYLCV welcomed DSNY's announcement in
25 January of the Queens Central Commercial Waste

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Zone, the City's first zone to be implemented as part of this law. While it has taken the City far too long to get to this point for such a commonsense policy, the CWZ law will bring the City closer to its zero waste goals and improve the safety of workers, pedestrians, and cyclists. It will also cut down on traffic congestion, improve air quality, and curb the City's tailpipe pollution and carbon emissions, which is especially important to low income and communities of color throughout the City.

Although the first zone is slated to roll out in September of this year, with the final implementation date for this zone in January 2025, we're still waiting for the law's full implementation, that's 19 other zones. While we understand the importance of starting off on the right foot and learning from other cities attempts at overhauling its waste system, it is imperative that the City carries out this law in a timely and transparent manner.

We urge the City to dedicate the requisite amount of resources and funding for staffing,

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education, and outreach to fully implement the CWZ law.

We also urge the DSNY to continue working towards transitioning to zero emission vehicles for DSNY and commercial sanitation trucks.

Additionally, the City must continue working with Dcast, utility companies, and industry professionals to ensure adequate charging infrastructure is installed and available for sanitation trucks throughout the City. Requiring cleaner fleets as part of the City's move to CWZs is also the best way to bring measurable air quality improvements to neighborhoods that house a disproportionately higher number of haulers and waste processing facilities.

NYLCV looks forward to seeing the timely implementation of this law so that all New Yorkers have the chance to breathe a little easier.

Thank you for the opportunity to testify.

MS. LIGUORI: Thank you very much for your testimony.

I would like to now call Lacy Tauber, the

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legislative director for the Brooklyn Borough
President's office. Lacy.

MS. TAUBER: Hi, thank you so much. So
I'm providing testimony today, as you
mentioned, on behalf of Brooklyn Borough
President Antonio Reynoso, who I'm sure, as you
know, was champion of Local Law 199, among many
of the applicants who are present today.

Thank you for holding this hearing today,
after many years of delays, the borough
president is heartened to see implementation of
CWZ finally moving forward. When the Council
passed this bill in 2019, we could not have
guessed that it would be 2025 by the time the
first zone was finalized.

Due to the delay in timeline and the
ongoing controversy surrounding RFP process and
resulting awards, it is even more important
that we get this done right.

This means providing transparency and
accountability at every step of DSNY's
implementation of this transformative program.
This rule-making process is, therefore, a
missed opportunity to codify such measures;

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there are three that I want to go over quickly.

One is outreach and education. Preparing businesses to participate with clear and accessible information is critical for the program's success. In fact, the law requires the commissioners of -- commissioner of sanitation and the chair of BIC to create an outreach and education program aimed at businesses, including information about how to work with the chosen carters, as well as the program's health and safety benefits. According to law, this program should include, but not be limited to, seminars, webs, conferences, and a multilingual education program. Yet, we have seen none of this, despite the very long runway between passage of the bill and implementation, which we're worried can leave business owners confused. At the Sanitation budget hearing on March 14th, Commissioner Tisch testified that the Department has \$3.2 million budgeted specifically for CWZ outreach and education, despite budget cuts. However, there is no indication of how Sanitation plans to spend

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this money in advance of September to prepare business in the language-diverse communities of Queens Central, including Corona, Jackson Heights, and East Elmhurst, not what happens when the spending dries up. A robust, culturally-sensitive and language-accessible outreach is critical for businesses to participate in the program successfully.

The BP will fight alongside the City Council for restoration of this outreach and education funding, but at the same time, Sanitation must make specific plans for this effort, in the pilot district, public and start their outreach efforts now.

The second thing is Matrix, which Eric already mentioned. Given that this is a pilot, how will the Department measure success? Sanitation said on the record in the past that they believed the way that we designed this program, it was on a path to failure; the borough president and his former colleagues obviously disagreed. They did not envision a pilot district in the legislation, and so set no metrics to evaluate the program's impact,

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based on implementation in only one district, so it's critical that Sanitation share its goals and evaluation criteria so that DSNY, the industry, the businesses, and the public can all fairly evaluate how the program is working and what needs to change, if anything, before a full program rollout.

The third thing is oversight. DSNY is currently out of compliance with the law because they have not convened with the commercial waste and safety task force since March of 2022, I believe, based on the notes that are on the website. The law tasked DSNY with forming and convening this committee quarterly through 2021, and annually through 2024.

Additionally, Council Member Sandy Nurse has proposed intro 352, which would create a commercial waste zones working group to advise on other elements of the program, outside of just safety, and the borough president encourages the Department to convene the safety task force in advance of implementing the pilot district, to advise on the metrics mentioned

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above and to support passage of intro 352
and/or create the working group on its own.

Finally, I want to underscore how
important it is we get this now. Since the
Department chose to announce all the carters
that were selected at once, we're already
seeing consolidation within the industry,
creating a potentially chaotic situation where
carters that were not selected may go out of
business before selected carters can
technically begin their work in the district,
potentially leaving businesses without
services, so it's critical that we move to full
implementation quickly and efficiently with
sufficient transparency and accountability to
build trust with the industry, local
businesses, and the public.

Thank you.

MS. LIGUORI: Thank you very much, Lacy.

Next to testify is Justin Wood from the
New York Lawyers for the Public Interest.

MR. WOOD: Good morning. Can everyone
hear me okay? Great, thank you.

Good afternoon, my name is Justin Wood,

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and I'm the director of policy at New York Lawyers for the Public Interest, NYLPI. We're a founding member of the Transform Don't Trash NYC Coalition, which for more than a decade has advocated for fundamental reform of the City's sprawling commercial waste system.

We are strongly supportive of the goals of Local Law 199, the law mandating a citywide transition to a zone commercial waste system passed over four years ago in 2019.

The clear intent of this law is to simultaneously make the current inefficient, dangerous and polluting commercial waste system far more transparent, accountable, efficient, and safe, while giving the City the tools it needs to sharply incentivize reductions in the vast amounts of commercial waste currently disposed in landfills and incinerators.

After years of delay in implementation, we are excited to see DSNY introduce this rule, beginning to set a timeline for transition to a new system in which designated private sanitation companies will finally be accountable to contractual standards negotiated

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with the City.

However, we are concerned by the extremely limited scope of the proposed rule, which sets a transition timeline for only one of 20 zones, a tiny slice of the overall system, and by the extremely limited amount of information the Department has released about plans to achieve waste reduction, reduce vehicle miles traveled, increase worker and public safety, and reduce pollution and traffic burdens on environmental justice communities located within and near the initial Central Queens zone.

Thus far, the public has not been able to view details of the plans submitted by each designated hauler in the first zone, including waste diversion plans, customer education plans, VMT reduction plans, prices, and the names and qualifications of all subcontractors, transfer stations, recycling facilities, and micro-haulers that the designated haulers intend to utilize to service the zone.

We remain concerned that some designated haulers, currently acting as brokers, may utilize subcontractors that could undermine the

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high environmental and labor standards envisioned in Local Law 199.

We, therefore, hope that transparent, full disclosure of contract details and a scaled-up commercial enforcement and customer education program are forthcoming.

Finally, I want to stress that the CWC system cannot achieve the transformational change and infrastructure investments necessary to achieve New York City and state's urgent environmental and safety mandates if it is treated as a limited pilot program, rather than a citywide transition to a new, high-performing waste system. For example, waste diversion will require citywide coordinated customer and employee education and training to successfully integrate organics recycling, donation of food and useful products and major reductions in disposable plastics into hundreds of thousands of business' daily operation citywide. This can and must be synchronized with DSNY's plan to, for example, expand residential curbside organics recycling service citywide over the next year, so that New Yorkers finally learn

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one set of simple and accessible rules and behaviors, regardless of whether they are recycling at home, at work, or in a public building or space.

Moreover, we need the waste industry to be able to make the major investments needed in organics recycling facilities, zero emission trucks, customer service infrastructure and community-level services, such as micro-haulers and waste auditors, to achieve the goals of Local Law 199, Plan NYC, and the New York State Climate Leadership and Community Protection, the CLCPA. This will be difficult or impossible for the industry if DSNY does not provide an on scale and capital financing that can only be achieved by rolling out a firm timeline for a citywide transition to the new CWZ system.

We therefore hope that DSNY will soon propose rules setting firm timelines for transition to the full CWZ system for the remaining 19 zones.

Thank you for the opportunity to testify today. We hope to work in partnership with the

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Department, City Council, borough presidents, and all the stakeholders of this exciting new system, to ensure that it reaches its envisioned transformational potential. Thank you.

MS. LIGUORI: Thank you very much.

Right now, no one else has signed up to testify. If you wish to testify at this time, you can please indicate so in the chat.

(No response.)

I believe you can use the raise hand function in Teams as well, so you can use that as well.

MS. LIGUORI: Last call. If you would like to testify, you may use the raise hand function or indicate so in the chat.

(No response.)

I'm going to repeat that, since someone just joined. This is the last call to testify, if you would like to testify, you may use the raise hand function or you may indicate so in the chat.

(No response.)

Comments may continue to be submitted to

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the Department until the close of business today. They may be submitted on the NYC Rules website or they can be e-mailed to Sanitation at nycrules@dshy.nyc.gov.

I am actually going to officially call this hearing to a close.

Thank you to everyone that came out to testify, and thank you very much and have a good day.

(Time Noted: 10:30 a.m.)

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<p>\$32 15:22</p> <p>1043g 4:23</p> <p>14th 15:20</p> <p>161002e3 4:15</p> <p>16b 3:13 4:24</p> <p>21st 9:4</p> <p>25th 25:16</p> <p>able 20:14 22:7</p> <p>about 7:18,20 9:7 15:10 20:8 (5)</p> <p>above 18:2</p> <p>accepting 5:13</p> <p>accessibility 2:19</p> <p>accessible 15:5 22:2</p> <p>accommodate 10:23</p> <p>accordance 2:8</p> <p>according 15:13</p> <p>accountability 14:22 18:16</p> <p>accountable 19:15,25</p> <p>accurate 25:9</p> <p>accurately 6:14</p> <p>achieve 20:8 21:9,11 22:11 (4)</p> <p>achieved 22:17</p> <p>achieving 9:24</p> <p>acquisition 7:25</p> <p>act 2:9</p> <p>acting 20:24</p>	<p>action 25:12</p> <p>active 8:21</p> <p>actually 24:6</p> <p>additionally 2:23 3:21 13:7 17:18 (4)</p> <p>address 5:5</p> <p>addressed 10:10</p> <p>adequate 13:9</p> <p>administrative 2:9 3:14 4:15,25 (4)</p> <p>advance 6:7 16:2 17:24</p> <p>advancing 3:11 9:17 11:3</p> <p>advise 17:20,25</p> <p>advocate 8:23</p> <p>advocated 19:6</p> <p>affairs 2:4</p> <p>affect 8:8</p> <p>affiliation 6:10,12</p> <p>after 14:11 19:20</p> <p>afternoon 18:25</p> <p>again 7:16,21</p> <p>against 7:23</p> <p>ago 19:11</p> <p>aimed 15:9</p> <p>air 12:9 13:14</p> <p>alex 6:16</p> <p>alia 11:5,9</p> <p>alongside 16:10</p>	<p>already 6:20 16:17 18:7</p> <p>also 6:14 10:17 12:8 13:4,13 (5)</p> <p>although 12:13</p> <p>am 10 2:3 24:6,11 25:11,13 (6)</p> <p>among 14:8</p> <p>amount 12:25 20:7</p> <p>amounts 19:18</p> <p>analyze 10:21</p> <p>andor 18:3</p> <p>announce 18:6</p> <p>announcement 11:24</p> <p>annually 17:16</p> <p>another 10:13</p> <p>antiquated 11:18</p> <p>antonio 14:7</p> <p>anyone 6:7</p> <p>anything 17:7</p> <p>applicants 14:9</p> <p>are 3:25 7:4,10,22 10:10 14:9 15:2 17:14 19:8,21 20:3 21:7 22:3 (13)</p> <p>area 3:15 6:9 7:4</p> <p>ask 5:7 6:14</p> <p>asked 7:2</p> <p>assessing 10:6</p> <p>attempts 12:20</p> <p>attending 2:6</p>
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