February 10, 2025

**TESTIMONY TO NEW YORK CITY COUNCIL REGARDING DSNY PROPOSED RULES REGARDING SUPPLEMENTAL CLEANING SERVICES**

I am Mark Caserta, Vice President of Small Business Support at the Brooklyn Chamber of Commerce. I am providing comments on the Department of Sanitation’s proposed containerization rules for organizations that provide supplemental cleaning services.

The Brooklyn Chamber of Commerce supports the Department of Sanitation’s goal of eliminating garbage bags on street corners and, as a result, reducing the number of rats on our city streets. However, we agree with the New York City BID Association’s comments on the proposed rules, especially:

Lack of funding: Small and medium business improvement districts (the vast majority of Brooklyn’s BIDs) were created through a city process through which a special assessment is collected by the City of New York and provided to the BIDs for services such as supplemental cleaning. In order to provide the best services possible at the lowest costs to landlords and merchants, BID budgets are tightly constructed and managed, without much wiggle room for additional expenses. The extra cost of installing secure, closed bins on public street corners on behalf of the City of New York or carting waste to Sanitation facilities without providing additional public funds is nothing more than an unfunded mandate. While BIDs do have the ability to raise assessments in order to account for additional costs, this process can be long and arduous and is not guaranteed. It requires sign-off from the City Council and the Mayor and could take more than a year, if successful.

Timing: Even if the proposed rules pass, as is, most small to medium BIDs would be unable to come up with the funds to comply with the rules by the deadline of August 1st. As noted, an assessment increase can take one year or more and is a legal process that is mandated by the City of New York. The only choice that our Brooklyn BIDs would have is to reduce or eliminate their services, which is not something that the City of New York should have as its ultimate goal. Again, BIDs were created through a City process and are encouraged. Why is another City agency creating a policy that could damage them? This make no sense.

We respectfully urge the Department of Sanitation to work with our BIDs to find funding and to be flexible in timing in order to preserve critical BID services and keep our streets safe and clean

Thank you.