**Testimonial Letter to the New York City Department of Sanitation (DSNY) on Proposed Rule Relating to Entities Engaging in Cleaning Services**

Thank you for this opportunity to provide testimony on the proposed rule relating to entities engaging in cleaning services. We are writing to ask you to withdraw the proposed rule, delay its implementation, and work with community organizations to reach a mutually beneficial solution such as a carve-out for community groups.

We represent the Clean Bushwick Initiative (CBI). CBI is a community organization based in Bushwick, Brooklyn, that works to improve the cleanliness and sustainability of our neighborhood. In 2024, we hosted 15 cleanups throughout Bushwick, engaging over 250 volunteers and taking over 3,600 lbs of trash off the street. Cleanups involve keeping our streets and green spaces free of debris. We also educate volunteers about sustainability issues.

We are concerned that the proposed rule amending Section 16-120(e)(2) would negatively impact organizations like ours. The rule prohibits placing refuse near public litter baskets and in other public locations but provides no practical alternatives for disposing of trash collected during community cleanups. This proposed rule does nothing to reduce street litter—it just outlaws cleaning it up.

**The Proposed Rule Does Not Prevent Litter, it Outlaws Cleanups**

Currently, Section 16-120(e) of the New York City Administrative Code prohibits the placement of household or commercial refuse in or around a public litter basket or in the streets or other public places. In effect, it is a rule against littering. Ostensibly, the proposed change seeks to clarify that community cleanup organizations, such as CBI, also may not place refuse within the vicinity of any public litter basket, or in the streets and other public locations. The actual effect of the proposed rule would be to make it illegal for community organizations to perform cleanups and remove trash from the streets and other green infrastructure, like rain gardens, because we would have nowhere to dispose of the trash we collect.

The notion that Section 16-120(e) needs *clarity* is misguided and appears to rely on a fundamental misunderstanding of what cleanup organizations like CBI do: they do not *create* trash, they *remove* it. The current rule does not contain a hidden exception allowing community cleanup organizations to litter or dispose of household and commercial refuse in public litter baskets. It would already be in violation of the current rule for an organization to bring personal or commercial refuse to public receptacles or into the public streets, but this is not what community cleanup organizations do. Community cleanups, like those organized by CBI, collect litter already in the streets, often caused by illegal dumping. By placing this waste near public receptacles, cleanup groups make it easier for DSNY to collect and dispose of it. Without the efforts of thousands of volunteers with multiple cleanup organizations across the city, the litter already in the streets would remain there, contributing to health and pest problems, blocking drains, clogging rain gardens, and potentially ending up in our waterways.

If the goal of Section 16-120 is to prevent litter and reduce trash in the streets, this proposed rule must be rejected. Cleanups work to clear streets of trash, not to leave more behind. This rule would discourage these efforts, leaving more litter on the streets and making it harder for volunteers to keep our neighborhoods clean.

**Broader Impact and Equity Issues**

Bushwick has been designated a disadvantaged community by the New York State Climate Justice Working Group and large parts of the neighborhood are included in a rat mitigation zone. The neighborhood already lacks adequate trash bins, enforcement, and resources for waste management. This rule would hurt underserved communities like ours the most, where residents rely on local efforts to keep streets clean. DSNY cannot manage all the waste on its own, so community groups fill an important gap. If groups like ours can’t operate, trash will pile up, and street cleanliness will decline. Beyond CBI, this rule will make it harder for schools, scout troops, park stewards, business improvement districts, and other groups to clean their neighborhoods.

The impact would go beyond just street cleanliness and beautification. CBI maintains a number of rain gardens in Bushwick in partnership with the NYC Department of Environmental Protection that are necessary to absorb stormwater, reduce flooding, and filter pollutants. Our cleanups regularly focus on clearing trash and debris from the rain gardens and surrounding streets to ensure that the gardens are able to function properly. Without a way to dispose of this waste, maintaining rain gardens becomes much harder, which could lead to more flooding and pollution.

**Recommendations and Conclusion**

Rather than outlawing community cleanup efforts, we would urge the DSNY to 1) provide practical disposal options for community cleanups, like designated drop-off points; 2) install more trash bins in neighborhoods like Bushwick, especially larger, more secure bins; 3) provide more education and resources to local businesses and property owners to ensure they are aware of their obligation to keep the sidewalks in front of their property clean, as well as 18 inches into the street; and 4) create a carve out in the proposed rule for non-profit community organizations.

Clean Bushwick Initiative is committed to improving our neighborhood and supporting DSNY’s mission to maintain cleaner streets. However, this proposed rule would make it harder for us and others to continue this vital work. Rejecting this rule and supporting community-led cleanups is essential to keeping New York City clean, safe, and healthy.

Sincerely,

Clean Bushwick Initiative