My name is Yelena Makhnin and I am an Executive Director of Brighton Beach BID in Brooklyn.

Our BID is one of the oldest in NYC and we are a small BID. We have supplementary sanitation service provided 7 days a week, 5 hours a day. We consider ourselves to be a great city partner helping keep our streets clean.

Instead of working with us and listening to us, DSNY is now moving ahead with the unfunded mandate being considered at this hearing, which assumes that BIDs can somehow either haul away or containerize the bags,

rather than staging them at corners until DSNY picks them and, if BIDs fail to do so, they will be

fined for providing these services. While we completely understand the desire to “get bags off

the street” this is a huge operational and financial burden for BIDs.
Currently we pay 47% of our budget for Sanitation services.
And we cannot afford to pay more without jeopardizing BID financial stability. While BIDs are ready

partners in getting trash off the streets, these changes to our operations would be financially

impossible for many BIDs. There’s also the complexity of sitting containers with DOT and local

stakeholders. We are deeply concerned that August 1st implementation is still too soon

for many BIDs to implement those changes. It is well-known fact that the larger BIDs that have voluntarily moved towards containerization have needed years to do so.

As for the proposed rule itself, it gives no guidance on what types of containers will be

allowable, aside from 55-gallon bins which would be wholly inadequate. BIDs are unclear about

why there is a mention of a 55-gallon container at all. The proposed rule also does not provide

for any flexibility whatsoever. If the ultimate goal here is to reduce rats – a goal which we share

– why not limit the times and hours that bags can be left out for pick up in close coordination

with DSNY? Wouldn’t this achieve the goal without the draconian rule being considered today?

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Also why not really enforce the law first getting rid of illegal dumping and improper disposal before putting additional burden on great city partners.

We ask DSNY to consider adding more flexibility to this rule so that more BIDs can realistically

comply.

Without additional flexibility and financial support, there is a real possibility that many BIDs –

especially medium and smaller BIDs – will have no choice but to cease supplemental sanitation

services altogether. In that case, the city may not have nicely-tied up bags on the street – it

would have overflowing trash cans along key corridors across the city. This is not what BIDs

want, and we suspect it is not what DSNY or the Mayor wants. We remain committed to

partnership with DSNY and the City of New York, but have found DSNY to have a lack of

understanding when it comes to how quickly and easily, we can operationalize their goals. This

rule is particularly insulting to partners that have worked to keep the city clean, a job that DSNY

cannot do alone. If the City wants to get bags off the street, they need to support organizations

financially and operationally that do this work and not introduce punitive measures which will not only affect BIDs financially but put our great relationship in jeopardy.