



**Morris Park Business Improvement District
966 Morris Park Avenue
Bronx, NY 10462**

Testimony for the February 10, 2025 NYC Department of Sanitation Public Hearing and Opportunity to Comment on Proposed Rules

**by Dr. Camelia Tepelus
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My name is Camelia Tepelus, I am the Executive Director of the Morris Park BID in the Bronx, a BID with a \$390,000 in assessment revenue, 1 full time staff member, paying 2 full time supplementary sanitation staff from our vendor Streetplus \$153,000/year, to clean up sidewalks along 21 blocks of commercial corridor on Morris Park Ave in the Bronx.

We cleaned Morris Park Avenue for the past 6 years, 7 hrs/day, 7 days/week, 365 days/year. The proposed rule simply states that what we can **NOT** do, which is place neatly collected bags of public “within the vicinity of any public litter basket”, but does not tell us what to do instead, other than requiring that “such materials be placed out for collection by the Department in rigid receptacles with tight-fitting lids.”

The rule does not indicate HOW to comply with it. It does not tell us WHERE would it be acceptable to DSNY for us place the excess PUBLIC trash we sweep. Former Commissioner Tish seemed to think that small BIDs with budgets of under \$.5 Mill mostly in outer boroughs can do the exact same thing that large BIDs do with \$25 Mill budgets, which is transport their own trash. Newsflash, being poor is not the same as being wealthy. And it is us, smaller BIDs that are a majority of all BIDs serving commercial corridors. And no, we can not afford to hire trucks to transport the additional trash to DSNY’s garages – which is the DSNY’s taxpayer-funded mandate to do.

This rule – in its current formulation – asks us to either stop cleaning sidewalks of our commercial corridors, or dispose of excessive trash, somehow by magic.

Nothing happens by magic. Cleaning the City takes careful planning, coordination, analysis, and finally execution that costs money. It is critical to remember that even though we/BIDs are privately funded by commercial property owners, at the end of the day, and just like DSNY we provide a public service: a service ensuring that commercial corridors create a positive pedestrian shopping experience, and bring taxpayers money to the budget. We are now paralyzed knowing that we will not afford to transport the trash ourselves – which is 1) the mandate of DSNY; and 2) would be both unaffordable and causing us to cut other critical programs – beautification, community events, holiday lights, etc.

At the moment we are basically stuffing our existing DSNY cans as much as possible, and hope this will be sufficient due to the low foot traffic associated to the cold weather. But come summer, we will need a procedure and a process of disposing of excess trash agreed with both DSNY and DOT.

Instead of this over-simplifying, trash-disappearance-by-magic rule, there are smarter and more collaborative ways for DSNY and BIDs to address this issue, including actual data collection and the ability to customize

implementation – **either through increased frequency of trash cans emptying, or through new mechanisms such as the “Empire Bin”, which, if installed on sidewalks, would need DOT approval for the site placement (see photos).**

We – BIDs servicing long commercial corridor are somehow expected by the former Commissioner Tish to do the same as individual businesses. But we collect much more public trash. If anything, we should be compared with larger apartment buildings, or schools, for which DSNY is already exploring better mechanisms to collect the garbage – such as the Empire Bins or the large containers that can be lifted by the sanitation trucks with side-forks.

Finally, there was a poor, non-collaborative process leading up to this regulation, which shows a significant and troublesome discrepancy between the DSNY executives and policy makers that were testifying in front of you at the November, and the DSNY operational staff on the ground that is in contact with us, such as Chief Frank Lettera, or in our case Bronx East 11 District Superintendent Vincent Allard, clearly much better informed, practical and conscious of the realities on the ground. We appreciate them and we thank them.

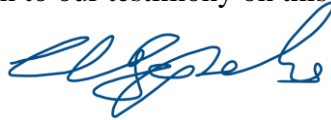
We are here to support cleanliness in the City, and to work alongside DSNY in smart, data-driven ways to make this a reality in NYC’s commercial corridors. We are optimistic that together we devise a strategy that is optimally applicable to each commercial corridor’s needs.

We are here to work together and to partner with DSNY in keeping our city clean in creating a thriving environment for small businesses and neighborhoods.

Please allow at least 1 more year until August 2026, to improve this rule and to give us sufficient time to articulate along with DSNY mechanisms for implementation to its desired aim – clean commercial corridors in NYC.

Thank you for your consideration to our testimony on this matter.

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Appendix:

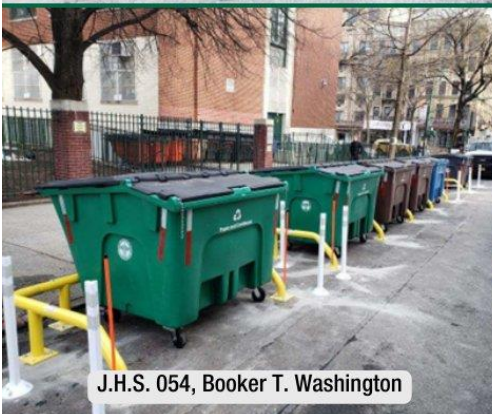
Bulk collection bins that could be offered by DSNY to BIDs in commercial corridors for collection of excessive trash, in order to accommodate the excess capacity needed



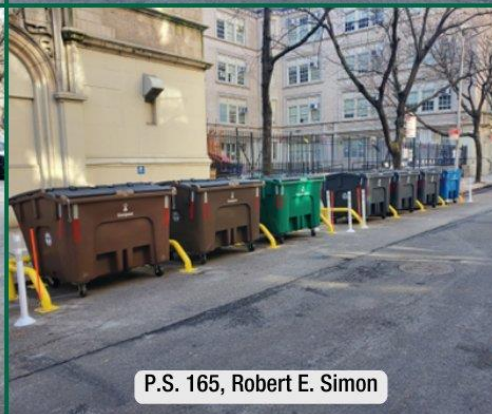
Edward R. Reynolds/Young Women's Leadership



P.S. 145, The Bloomingdale School



J.H.S. 054, Booker T. Washington



P.S. 165, Robert E. Simon