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

To Whom It May Concern,

I am a planning member of the Clean Bushwick Initiative, a community group that organizes regular street cleanups, a Super Steward with NYC Parks, and a Rain Garden steward with the NYC Department of Environmental Protection, though opinions here are my own. In my volunteer capacity in all these roles, I have filled the gap for the DSNY by removing litter and illegally dumped debris off the streets. I strongly oppose the proposed rule change outlined in Section 16-120(e)(2). I, along with numerous other volunteers, work tirelessly to keep our NYC neighborhoods clean by collecting litter and placing it in bags near public trash bins for pickup. This proposed rule creates unnecessary obstacles that will make it significantly more difficult for us to continue our efforts.

First and foremost, requiring individual volunteers and community groups to use rigid receptacles with tight-fitting lids presents a logistical challenge. Unlike businesses or residents who have designated trash collection systems, individual volunteers and community cleanup groups operate on a volunteer basis, often working on an ad-hoc schedule. Carrying large, rigid containers to various cleanup sites is impractical, especially for volunteers who clean in areas far from their homes and rely on public transportation. Trash bags have been the most efficient way to collect and dispose of litter without burdening volunteers with cumbersome equipment.

Additionally, prohibiting the placement of bagged litter near public trash bins forces the clean-up community to choose between discontinuing clean-ups or risking fines. Public trash bins are natural collection points that ensure litter is properly disposed of instead of being left scattered on sidewalks or streets. If our volunteers are not allowed to leave collected litter in a reasonable location for city pickup, the only option will be to transport it ourselves—a task that is simply not feasible given our limited resources. Without a viable alternative, this rule risks discouraging volunteer cleanups altogether, leading to dirtier streets, more rats, and other environmental hazards.

Furthermore, imposing penalties on community groups for simply trying to help maintain public spaces punishes volunteers for helping our communities. Volunteer-driven initiatives should be encouraged, not penalized, especially at a time when sanitation services are already strained. Rather than enforcing rigid and impractical disposal requirements, the Department of Sanitation should work collaboratively with community organizations to find solutions that support, rather than hinder, grassroots cleanup efforts.

I urge the Department to delay issuing new rules on this issue for at least a year to allow time to develop policies that facilitate community engagement in keeping our neighborhoods clean. Possible alternatives include designated drop-off points for community cleanup efforts or allowing exceptions for DSNY issued bags to be used for voluntary litter collection.

Volunteers give their time and effort freely to improve the city. Do not make it harder for us to do so.

Sincerely,

Ulrike Nischan