

**DSNY Rules Hearing Testimony  
Relating to Entities Engaging in Cleaning Services  
February 10, 2025**

The Soho Broadway Initiative is the business improvement district that provides supplemental sanitation in the area bounded by Houston, Canal, Crosby, and Mercer. Our dedicated clean team manages an average of 150 bags per day, providing service daily in the area recently lauded as the most active retail district in North America. Our daily task of keeping the streets clean is both cumbersome and critical.

In order to keep trash bags off of the two busiest corners in our district, we installed a prototype trash container in 2023. This container had an initial cost of \$30,000 and requires ongoing maintenance. It also holds less than 10% of our average daily bags managed. If we were to purchase additional units of the same type to containerize all of the trash we manage daily, we would need 14 additional containers, which would cost \$420,000. This fee is more than our annual sanitation budget (roughly \$358,000) and nearly half of our assessment for this fiscal year (\$900,000). This is certainly not feasible. It is also inappropriate for a city agency to force a partner organization to spend private dollars to meet its unfunded mandates.

Even if we were to identify an affordable container set, I have deep concerns about making this investment. Curb space is limited in our bustling district and competition for the curb continues to increase. As we move toward the rollout of commercial waste zones and containerization for large residential buildings, one can assume additional containers will be needed at the curb lane. A more coordinated approach should be considered. It is also difficult for BIDs to identify feasible locations for containers as the onus is on the BID to notify impacted properties. These properties and businesses are our stakeholders and most of them would not be in favor of placing a large container in front of their building. This is guaranteed to create conflicts between the BIDs and the neighbors we serve.

I am also concerned by the temporary nature of the language used in the agreements to place containers. A two-year agreement with a one-year extension is not appropriate given the financial investment we would need to make. If the city is not considering this to be a long-term solution, they should work with us to create short-, mid- and long-term solutions. We have presented ourselves as willing partners with a shared goal of keeping the city's streets clean. Unfortunately, the agency has failed to take our concerns and expertise into account. Finally, I fear that other city agencies that would be impacted by the siting of new containers have not been properly consulted. This directly intersects with the work of the Department of Transportation, Landmarks Preservation Commission, and the Public Design Commission. Without their consultation at this phase of the process, our BID could purchase and install containers that do not meet the requirements of these agencies.

This proposal to fine partner organizations for carrying out work that would otherwise be the responsibility of DSNY is absurd. Furthermore, this punitive enforcement regime will negatively impact the members of our clean team. Many of the employees that keep our streets clean are from vulnerable populations and have in the past experienced addiction, homelessness, or incarceration. Forcing interactions between these hard-working individuals while on the job and law enforcement is cruel.

This rule will not create a pathway to its stated goals. BIDs are dedicated partners to the city, creative problem solvers, and extremely nimble. It is my hope that this rule-making process is halted, and the agency and BIDs can work together in earnest to meet shared goals.