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**Testimony of the Grand Central Partnership, Inc. on the Proposed Rule Relating to  
Entities Engaging in Cleaning Services**

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The Grand Central Partnership (GCP) would like to thank the New York City Department of Sanitation (DSNY) for this opportunity to present testimony in connection with the agency's proposed rule relating to Entities Engaging in Cleaning Services.

At the outset, we would like to recognize the tremendous work that DSNY – from the uniformed workers to agency leadership – does to keep our city clean. We also greatly value the agency's close, longtime partnership with Business Improvement Districts (BIDs) like ours.

GCP is one of the largest BIDs in New York City, serving a 70-square-block area of Midtown East around Grand Central Terminal. We take tremendous pride in providing a wide array of supplemental municipal services to the community we serve including delivering supplemental sanitation services 365 days a year. The sanitation services provided by our team of more than 50 full-time unionized sanitation sweepers include sweeping streets, curb lines, and sidewalks, emptying trash receptacles, and preparing bags of trash for pickup. The municipal waste we manage is generated not by the BID, not by the commercial or residential buildings, and not by the retail businesses within our boundaries, but by the general public.

GCP strongly supports the goals of containerization. In fact, we worked years ago with stakeholders to develop a similar plan, albeit unsuccessful, to remove public trash bags from the sidewalks and store them in centralized containers on private property. As an organization that dedicates over 80,000 staff hours annually to sanitation and collects and prepares almost 200,000 bags of municipal waste generated by the public, GCP clearly understands the impact that garbage disposal has on quality of life in our communities. As a consequence, GCP has also made significant investments in operations and technology to reduce the time trash bags remain on the curb.

However, the proposed rule is highly problematic and, frankly, insulting for several reasons.

First, to reiterate, this is not our private waste; it is the municipal waste generated by the public. GCP simply sweeps it, bags it, and prepares it for eventual pickup by DSNY, or by a private

carter we privately fund to support New York's Strongest, preventing overflowing garbage receptacles and dirty streets. Treating entities like GCP as "illegal dumpers" is a slap in the face to all BIDs and the longstanding partnership we have had with the City in supplementing core services that it cannot fully provide itself. Since the 1980s, BIDs have partnered with the City to fill critical gaps in city services and bring sanitation standards to an acceptable level. To impose financial penalties on BIDs for simply providing services that DSNY is ultimately responsible for is outrageous.

Another critical issue is the one-size-fits-all approach the rule proposes. Each BID has its own unique character, with different types of building density, foot traffic, and waste generation. A rigid rule that does not account for these differences is likely to be difficult to implement and could have unintended consequences. For example, GCP and other BIDs have been working with DSNY on specific types of large containers, which may be ideal for some BIDs but not all. The proposed rule does not adequately account for those ongoing discussions.

Finally, the most complicated hurdle that GCP and other BIDs must overcome involves the actually siting of these containers. Our desire to comply with detailed regulations issued by two city agencies governing the size and materials of containers and the permissible locations such containers can be installed have not aligned with our ability to find suitable locations that do not obstruct and block commercial and retail businesses in our community. And even if GCP and other BIDS located private, but readily accessible, locations for our containers, it is unclear whether DSNY would service them. Organizations like GCP fear that we would be replacing the unsightly eyesore of trash bags temporarily waiting for pickup with the more permanent one of large container units dotting our neighborhoods.

Enforcement of the recently launched business containerization program has been inconsistent. More time and resources should be dedicated to fully implementing and evaluating these initiatives. Instead of penalizing BIDs for stepping in to provide crucial sanitation services, we urge DSNY to focus on refining existing containerization programs, learning from those experiences, and continuing to collaborate with BIDs to achieve our shared goals.

In conclusion, while containerization has merit, the way this policy has been rolled out has been horrendous. Any rule penalizing BIDs for doing this work should be stopped. We implore DSNY to reconsider its approach and work with us to find solutions that balance the needs of our neighborhoods with the City's goals, without penalizing us, their partners.