

APPENDIX A

**Table 1
Existing Laws and Regulations**

Source of Law	Effective Date	Summary
Local Law 42 of 1996	Effective 6/03/1996	The City Council passed Local Law 42 of 1996, creating the Trade Waste Commission (TWC) to oversee and regulate the commercial waste industry. In 2001, via charter revision, the TWC was combined with the Markets Division at Small Business Service and the Gambling Commission and renamed Business Integrity Commission (BIC).
New York City Administrative Code: Title 16A: Commercial Waste Removal		
Chapter 1: Trade Waste Removal 16-501 through 16-526	In Effect	These laws define BIC’s responsibilities such as licensing, registration and regulation of businesses that remove, collect or dispose of trade waste and trade waste brokers. BIC’s responsibilities include: a) Issuing and establishing standards for the issuance, suspension and revocation of licenses and registrations that authorize the operation of businesses engaged in the collection, removal or disposal of waste within the city and trade waste broker businesses; b) Establishing maximum and minimum rates for the collection, removal, or disposal of such waste; c) Investigating carters should it be warranted; d) Establishing standards for service and for the regulation and conduct of businesses , including but not limited to requirements governing the level of service to be provided, contracts for trade waste removal, billing form and procedures, the maintenance and inspection of records, the maintenance of appropriate insurance, and compliance with safety and health measures; e) Appointing employees to staff; f) Providing education programs to educate customers on waste classification and rights in contractual agreements; and g) Establishing fees for executing provisions.
The New York City Administrative Code: Title 16: Sanitation		
Chapter 1: Department of Sanitation and Chapter 3: Solid Waste Recycling	In Effect	This law requires commercial establishments to provide for the removal of waste by a business licensed by BIC or allows them to obtain permission to remove their own waste. This regulation also: • Requires signage indicating the carter that services the business and the time their waste gets picked up. • Prevents the discard of commercial refuse or liquid waste in public litter baskets. • Allows the Commissioner of DSNY to adopt and implement rules related to recycling requirements. • Describes carter responsibilities under recycling rules. • Requires businesses to source-separate their waste to minimize contamination of designated recyclables and maximize marketability.

Table 1
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Source of Law	Effective Date	Summary
		<ul style="list-style-type: none"> • Allows BIC to adopt and implement rules requiring carters to properly collect and recycle source-separated materials. • Required DSNY to undertake the New York City Commercial Solid Waste Study and Analysis of commercial recycling in the city no later than January 1, 2012. This commercial recycling study focused on the putrescible portion of the commercial waste stream.
<p style="text-align: center;">Citywide Recycling Program, § 16-306.1 Organic Waste, as amended</p>	<p style="text-align: center;">Effective 7/01/2015, last amended 3/27/2018</p>	<p>Under Local Law 146 of 2013, this law requires certain New York City businesses to separate their organic waste. The current list of covered establishments, last amended March 2018, includes the following:</p> <ol style="list-style-type: none"> 1) Food manufacturers with a floor area of at least 25,000 square feet; 2) Food wholesalers with a floor area of at least 20,000 square feet; 3) Retail food stores with a floor area of at least 25,000 square feet, or any retail food store that is part of a chain of three or more retail food stores that have a combined floor area space of at least 10,000 square feet and that operate under common ownership or control and receive waste collection from the same private carter; 4) Arenas or stadiums with a seating capacity of at least 15,000 people; 5) Food service establishments that are part of a chain of two or more food service establishments that have a combined floor area of at least 8,000 square feet and under same ownership/control; are individual outlets of a parent business, and do business under the same corporate name; 6) Food service establishments with a floor area of at least 7,000 square feet, provided that the requirements of subparagraph (i) of paragraph 1 of subdivision c of this section shall not apply to any such location when the building or premises containing such location is in compliance with such requirement pursuant to paragraph seven of this definition; 7) Food service establishments with a total combined floor area of at least 8,000 square feet and where the owner of the building or premises, or its agent, arranges or contracts with a private carter for the removal of waste from food service establishments having no less than eight thousand square feet of such building or premises, provided that any such food service establishments shall comply with the requirements of subparagraphs (ii), (iii) and (iv) of paragraph 1 of subdivision c of this section, but such requirements shall not apply to the owner or agent of any such building or premises; 8) Food preparation establishments with a floor area of at least 6,000 square feet; 9) Catering establishments at events with the anticipated attendance is greater than 100 people; 10) Food service establishments located within and providing food to one or more hotels totaling at least 100 sleeping rooms; and 11) Sponsors of a temporary public event. <p>In addition, the regulation requires the Commissioner of DSNY to annually evaluate the regional capacity and cost to process organics. Any transfer station that receives source separated organic waste pursuant to this section shall deliver or have delivered such organic waste directly to a facility that accepts organic waste for purposes of composting, aerobic or anaerobic digestion, or any other method of processing organic waste that the department approves by rule. This does not apply to waste that cannot be processed at an organic waste processing facility. Lastly, this regulation allows DSNY, BIC, the Department of Health and Mental Hygiene, and the Department of Consumer affairs to promulgate any rules necessary to implement the separation requirements.</p>

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Source of Law	Effective Date	Summary
Recycling of Private Carter, Collected Waste	Effective 3/01/2018	This regulation defines designated recyclable materials for commercial waste, provides source separation, set-out, and collection requirements, and allows the Commissioner of DSNY to conduct inspections to ensure compliance. Recyclable materials are required to be placed in transparent bags and or labelled bins, certain designated paper must be tied and bundled securely, and waste streams cannot be commingled. In addition, this regulation sets out requirements for businesses who choose to transport their own designated recyclable materials to a central holding location.
Specifications for Trucks and Vehicles Conveying Rubbish through the Streets	In Effect	This regulation provides specifications for waste collection vehicles. (Do you need citations throughout?)
Title 17: Business Integrity Commission: Chapter 1: Trade Waste		
This title of regulations provides definitions for BIC. Defines rate caps for waste collection. Describes licensing requirements for carters and brokers. Lists license application requirements. Provides terms for license application rejection. Details investigation, license revocation or suspension, penalties, liabilities, enforcement, hearing procedures, and other processes related to incidences of improper carter and broker conduct.		
Compliance with Applicable Local Law and Regulation	In Effect	This regulation requires that carters comply with all the laws, rules, and regulations of federal, state and local governmental authorities having jurisdiction over any of their activities, including, but not limited to, rules and regulations of the Department of Environmental Protection, the Department of Health, DSNY and the Department of Transportation concerning the vehicle specifications, sanitary requirements, handling, transport, receipt, transfer or disposal of trade waste, regulated medical waste or waste containing asbestos or other hazardous, toxic or dangerous material.
Rates	Modification Effective 8/09/2018	This regulation provides rules in connection with carter billing, including: <ul style="list-style-type: none"> • Carters cannot demand, charge, exact, or accept rates for the collection, removal, disposal, or recycling of trade waste greater than the following maximum rates: (1) \$20.76 per cubic yard and (2) \$13.62 per 100 pounds. • These rates do not apply to construction debris and carters can charge less than these maximum rates. • In the event that a written contract or other agreement between a carter and a customer uses a "flat" billing method, whether based on weight or on volume, a customer has the right to have this rate determined by a survey provided at no charge by the carter. • Carters who charge on the basis of the weight of a customer's waste will need to use scales that are accurate and calibrated. • Carters who use third party services to weigh a customer's waste must insure that the scales used by them are accurate and properly calibrated. • The weight of a customer's waste is be determined by subtracting the weight of the container the waste is in from the weight of the trash itself.
Operations	Effective 8/06/2016	This regulation provides requirements for carter operations, including how material should be disposed of, where material can be disposed of, and how to clean vehicle containers.

NYC Commercial Waste Zone Program

**Table 1
Existing Laws and Regulations**

Source of Law	Effective Date	Summary
Labeling of Containers	Effective 8/06/2016	This regulation provides requirements for container labeling, labeling volume capacity of each container, container owner name, and whether organics are being disposed within a specific container.
Recycling Requirements for Licensees	Effective 8/06/2016	This regulation provides recycling requirements for carters, including requirements that source-separated materials cannot be commingled and rules for handling organic material.
Record Keeping	Effective 4/5/2018	This regulation outlines carter requirements for record keeping. Carters are required to maintain records concerning their business which include bills and purchase invoices, deposit slips, copies of checks received from payers, bank statements, cancelled checks, tax returns (copies of Federal, State, and local returns with all supporting schedules), waste surveys, rate schedules, documents concerning mergers, acquisitions, subcontracts and asset sales, lists of collection routes and schedules, and submissions to and notices from the Commission. This regulation also states that carters need to maintain records of cash payments and prohibits carters from making checks payable to cash. In addition, a carter must maintain a complete and accurate set of books of account reflecting the operation of its business.
Agreements and Contracts with Customers, Service to Customers	Effective 4/5/2018	This regulation allows for agreements between a carter and its customer to be made in oral form. In addition, this regulation states that carters can discontinue service to any customer, or raise the rates charged to a customer, after having provided at least 14 days written notice.
Other Regulations		
Local Law 152 of 2018, also called the Waste Equity Law	Effective 8/16/2018	Local Law 152 of 2018 amends the administrative code of the City of New York to reduce the permitted capacity at putrescible and non-putrescible solid waste transfer stations in certain overburdened community districts in New York City.
New York City Minimum Wage	In Effect until 12/30/2018	The New York State minimum wage increased on December 31, 2017. In New York City, is the minimum wage is \$12.00 per hour for businesses with 10 or fewer employees, and \$13.00 per hour for businesses with 11 or more employees. There are different hourly rates for workers in the fast food industry and those who receive tips. These rates remain in effect until December 30, 2018.
Local Law 145 of 2013	Effective 1/01/2020	This law requires that beginning January 1, 2020, any heavy duty trade waste hauling vehicle must utilize best available retrofit technology or be equipped with an engine certified to the applicable 2007 EPA standards for particulate matter. A Heavy duty trade waste hauling vehicle" means any diesel-fuel powered vehicle with a gross weight of over sixteen thousand pounds that is owned or operated by an entity that requires a BIC license and that is operated in New York city for collection and/or removal of trade waste.
Local Law 56 of 2017	Effective 1/01/2024	This law requires that all trade waste hauling vehicle be equipped with side guards by January 1, 2024.
Solid Waste Management Plan (SWMP)	Approved 10/27/2006	The City is required to adopt a SWMP for at least a 10-year period under New York State Environmental Conservation Law. The current plan is in effect through 2025, at which point a new plan will be evaluated and developed. The SWMP seeks to improve environmental and public health effects of waste collection through the reduction in truck transport. To reach this goal, the SWMP provides for the shift from a long-haul trucking-

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		<p>oriented system for DSNY-managed waste, by which such waste is transported to landfills and waste-to-energy plants outside the City by trucks, to a system of transporting such waste from marine and rail transfer stations located throughout the five boroughs. Full implementation of the SWMP is anticipated to reduce the City's annual GHG emissions by 34,000 tons and annual local and long-haul waste truck travel by 60 million miles.</p> <p>Overall, the SWMP has two major goals:</p> <ol style="list-style-type: none"> 1) the gradual elimination of long-haul truck transport of DSNY-managed municipal solid waste, and 2) the improvement of neighborhood equity with respect to waste management by reducing the intensity of waste transfer activity in certain affected neighborhoods and reducing related truck traffic.
BIC Rulemaking New Section 1-12	Adopted 10/9/2018	<p>These rule amendments are designed to improve the safety of the general public:</p> <ul style="list-style-type: none"> • Requiring licensees to increase the limits on commercial general liability, business automobile liability and employers' liability insurance, as well as require registrants to increase the limit on business automobile liability insurance. • Requiring licensees and registrants to notify BIC of their drivers' Vehicle and Traffic Law violations and drivers' license suspensions and revocations, crashes that involve a vehicle used in the licensee's or registrant's business, and to notify BIC of certain adverse actions by government authorities. • Requiring licensees and registrants to maintain written policies and procedures regarding compliance with federal, state and local laws, rules and regulations. • Requiring licensees and registrants to maintain Report of Motor Vehicle Accident (MV-104) forms and other forms related to crashes and adverse determinations by government authorities.

**Table 2
Existing Guidance Documents**

Guidance	Effective Date	Summary
BIC Safety Manual	Issued 2/01/2018	<p>The BIC Safety manual is a guidance document for use by private carters to craft their health and safety programs. The BIC Safety Manual contains guidelines addressing areas of worker readiness, hazards in the workplace, pre-trip planning and inspection, review of traffic laws, driving hazards, driving tips to avoid collisions, tips on safe stops and proper lifting, what to do in an emergency, and how to keep workers and carters accountable to guidelines that they choose to adopt.</p>

APPENDIX B

NEW YORK CITY WATERFRONT REVITALIZATION PROGRAM Consistency Assessment Form

Proposed actions that are subject to CEQR, ULURP or other local, state or federal discretionary review procedures, and that are within New York City's Coastal Zone, must be reviewed and assessed for their consistency with the [New York City Waterfront Revitalization Program](#) (WRP) which has been approved as part of the State's Coastal Management Program.

This form is intended to assist an applicant in certifying that the proposed activity is consistent with the WRP. It should be completed when the local, state, or federal application is prepared. The completed form and accompanying information will be used by the New York State Department of State, the New York City Department of City Planning, or other city or state agencies in their review of the applicant's certification of consistency.

A. APPLICANT INFORMATION

Name of Applicant: New York City Department of Sanitation

Name of Applicant Representative: Steven N. Brautigam, Assistant Commissioner, Legal Affairs

Address: 125 Worth Street, Room 706, New York, NY 10013

Telephone: 646-885-4685 Email: sbrautig@dsgny.nyc.gov

Project site owner (if different than above): Not Applicable

B. PROPOSED ACTIVITY

If more space is needed, include as an attachment.

I. Brief description of activity

The City of New York is proposing to establish and implement a commercial waste zone (CWZ) program across the five boroughs of New York City (the Proposed Action). The CWZ program will convert the current open market to a zoned system for commercial waste collection.

2. Purpose of activity

The CWZ program is intended to reduce the existing overlap of commercial carting routes and enhance efficiency, worker and pedestrian safety, transparency in contracting, and customer service. It will also further the City's recycling and sustainability goals and reduce truck traffic and associated air, noise and greenhouse gas emissions

C. PROJECT LOCATION

Borough: Citywide Tax Block/Lot(s): Not Applicable

Street Address: Not Applicable

Name of water body (if located on the waterfront): _____

D. REQUIRED ACTIONS OR APPROVALS

Check all that apply.

City Actions/Approvals/Funding

City Planning Commission Yes No

<input type="checkbox"/> City Map Amendment	<input type="checkbox"/> Zoning Certification	<input type="checkbox"/> Concession
<input type="checkbox"/> Zoning Map Amendment	<input type="checkbox"/> Zoning Authorizations	<input type="checkbox"/> UDAAP
<input type="checkbox"/> Zoning Text Amendment	<input type="checkbox"/> Acquisition – Real Property	<input type="checkbox"/> Revocable Consent
<input type="checkbox"/> Site Selection – Public Facility	<input type="checkbox"/> Disposition – Real Property	<input type="checkbox"/> Franchise
<input type="checkbox"/> Housing Plan & Project	<input type="checkbox"/> Other, explain: _____	
<input type="checkbox"/> Special Permit		

(if appropriate, specify type: Modification Renewal other) Expiration Date: _____

Board of Standards and Appeals Yes No

<input type="checkbox"/> Variance (use)	
<input type="checkbox"/> Variance (bulk)	
<input type="checkbox"/> Special Permit	

(if appropriate, specify type: Modification Renewal other) Expiration Date: _____

Other City Approvals

<input checked="" type="checkbox"/> Legislation	<input type="checkbox"/> Funding for Construction, specify: _____
<input checked="" type="checkbox"/> Rulemaking	<input type="checkbox"/> Policy or Plan, specify: _____
<input type="checkbox"/> Construction of Public Facilities	<input type="checkbox"/> Funding of Program, specify: _____
<input type="checkbox"/> 384 (b) (4) Approval	<input type="checkbox"/> Permits, specify: _____
<input checked="" type="checkbox"/> Other, explain: <u>DSNY Approval of Commercial Waste Zone Master Contracts</u>	

State Actions/Approvals/Funding

<input type="checkbox"/> State permit or license, specify Agency: _____	Permit type and number: _____
<input type="checkbox"/> Funding for Construction, specify: _____	
<input type="checkbox"/> Funding of a Program, specify: _____	
<input type="checkbox"/> Other, explain: _____	

Federal Actions/Approvals/Funding

<input type="checkbox"/> Federal permit or license, specify Agency: _____	Permit type and number: _____
<input type="checkbox"/> Funding for Construction, specify: _____	
<input type="checkbox"/> Funding of a Program, specify: _____	
<input type="checkbox"/> Other, explain: _____	

Is this being reviewed in conjunction with a [Joint Application for Permits?](#) Yes No

E. LOCATION QUESTIONS

1. Does the project require a waterfront site? Yes No
2. Would the action result in a physical alteration to a waterfront site, including land along the shoreline, land under water or coastal waters? Yes No
3. Is the project located on publicly owned land or receiving public assistance? Yes No
4. Is the project located within a FEMA 1% annual chance floodplain? (6.2) Yes No
5. Is the project located within a FEMA 0.2% annual chance floodplain? (6.2) Yes No
6. Is the project located adjacent to or within a special area designation? See [Maps – Part III](#) of the NYC WRP. If so, check appropriate boxes below and evaluate policies noted in parentheses as part of WRP Policy Assessment (Section F).
 - Significant Maritime and Industrial Area (SMIA) (2.1)
 - Special Natural Waterfront Area (SNWA) (4.1)
 - Priority Maritime Activity Zone (PMAZ) (3.5)
 - Recognized Ecological Complex (REC) (4.4)
 - West Shore Ecologically Sensitive Maritime and Industrial Area (ESMIA) (2.2, 4.2)

F. WRP POLICY ASSESSMENT

Review the project or action for consistency with the WRP policies. For each policy, check Promote, Hinder or Not Applicable (N/A). For more information about consistency review process and determination, see **Part I** of the [NYC Waterfront Revitalization Program](#). When assessing each policy, review the full policy language, including all sub-policies, contained within **Part II** of the WRP. The relevance of each applicable policy may vary depending upon the project type and where it is located (i.e. if it is located within one of the special area designations).

For those policies checked Promote or Hinder, provide a written statement on a separate page that assesses the effects of the proposed activity on the relevant policies or standards. If the project or action promotes a policy, explain how the action would be consistent with the goals of the policy. If it hinders a policy, consideration should be given toward any practical means of altering or modifying the project to eliminate the hindrance. Policies that would be advanced by the project should be balanced against those that would be hindered by the project. If reasonable modifications to eliminate the hindrance are not possible, consideration should be given as to whether the hindrance is of such a degree as to be substantial, and if so, those adverse effects should be mitigated to the extent practicable.

		Promote	Hinder	N/A
I	Support and facilitate commercial and residential redevelopment in areas well-suited to such development.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
I.1	Encourage commercial and residential redevelopment in appropriate Coastal Zone areas.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
I.2	Encourage non-industrial development with uses and design features that enliven the waterfront and attract the public.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
I.3	Encourage redevelopment in the Coastal Zone where public facilities and infrastructure are adequate or will be developed.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
I.4	In areas adjacent to SMIA's, ensure new residential development maximizes compatibility with existing adjacent maritime and industrial uses.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
I.5	Integrate consideration of climate change and sea level rise into the planning and design of waterfront residential and commercial development, pursuant to WRP Policy 6.2.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

		Promote	Hinder	N/A
2	Support water-dependent and industrial uses in New York City coastal areas that are well-suited to their continued operation.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2.1	Promote water-dependent and industrial uses in Significant Maritime and Industrial Areas.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2.2	Encourage a compatible relationship between working waterfront uses, upland development and natural resources within the Ecologically Sensitive Maritime and Industrial Area.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2.3	Encourage working waterfront uses at appropriate sites outside the Significant Maritime and Industrial Areas or Ecologically Sensitive Maritime Industrial Area.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2.4	Provide infrastructure improvements necessary to support working waterfront uses.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2.5	Incorporate consideration of climate change and sea level rise into the planning and design of waterfront industrial development and infrastructure, pursuant to WRP Policy 6.2.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3	Promote use of New York City's waterways for commercial and recreational boating and water-dependent transportation.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3.1.	Support and encourage in-water recreational activities in suitable locations.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3.2	Support and encourage recreational, educational and commercial boating in New York City's maritime centers.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3.3	Minimize conflicts between recreational boating and commercial ship operations.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3.4	Minimize impact of commercial and recreational boating activities on the aquatic environment and surrounding land and water uses.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3.5	In Priority Marine Activity Zones, support the ongoing maintenance of maritime infrastructure for water-dependent uses.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4	Protect and restore the quality and function of ecological systems within the New York City coastal area.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.1	Protect and restore the ecological quality and component habitats and resources within the Special Natural Waterfront Areas.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.2	Protect and restore the ecological quality and component habitats and resources within the Ecologically Sensitive Maritime and Industrial Area.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.3	Protect designated Significant Coastal Fish and Wildlife Habitats.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.4	Identify, remediate and restore ecological functions within Recognized Ecological Complexes.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.5	Protect and restore tidal and freshwater wetlands.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.6	In addition to wetlands, seek opportunities to create a mosaic of habitats with high ecological value and function that provide environmental and societal benefits. Restoration should strive to incorporate multiple habitat characteristics to achieve the greatest ecological benefit at a single location.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.7	Protect vulnerable plant, fish and wildlife species, and rare ecological communities. Design and develop land and water uses to maximize their integration or compatibility with the identified ecological community.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.8	Maintain and protect living aquatic resources.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

		Promote	Hinder	N/A
5	Protect and improve water quality in the New York City coastal area.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5.1	Manage direct or indirect discharges to waterbodies.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5.2	Protect the quality of New York City's waters by managing activities that generate nonpoint source pollution.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5.3	Protect water quality when excavating or placing fill in navigable waters and in or near marshes, estuaries, tidal marshes, and wetlands.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5.4	Protect the quality and quantity of groundwater, streams, and the sources of water for wetlands.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5.5	Protect and improve water quality through cost-effective grey-infrastructure and in-water ecological strategies.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6	Minimize loss of life, structures, infrastructure, and natural resources caused by flooding and erosion, and increase resilience to future conditions created by climate change.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6.1	Minimize losses from flooding and erosion by employing non-structural and structural management measures appropriate to the site, the use of the property to be protected, and the surrounding area.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6.2	Integrate consideration of the latest New York City projections of climate change and sea level rise (as published in <i>New York City Panel on Climate Change 2015 Report, Chapter 2: Sea Level Rise and Coastal Storms</i>) into the planning and design of projects in the city's Coastal Zone.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6.3	Direct public funding for flood prevention or erosion control measures to those locations where the investment will yield significant public benefit.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6.4	Protect and preserve non-renewable sources of sand for beach nourishment.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7	Minimize environmental degradation and negative impacts on public health from solid waste, toxic pollutants, hazardous materials, and industrial materials that may pose risks to the environment and public health and safety.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.1	Manage solid waste material, hazardous wastes, toxic pollutants, substances hazardous to the environment, and the unenclosed storage of industrial materials to protect public health, control pollution and prevent degradation of coastal ecosystems.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7.2	Prevent and remediate discharge of petroleum products.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7.3	Transport solid waste and hazardous materials and site solid and hazardous waste facilities in a manner that minimizes potential degradation of coastal resources.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8	Provide public access to, from, and along New York City's coastal waters.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8.1	Preserve, protect, maintain, and enhance physical, visual and recreational access to the waterfront.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8.2	Incorporate public access into new public and private development where compatible with proposed land use and coastal location.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8.3	Provide visual access to the waterfront where physically practical.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8.4	Preserve and develop waterfront open space and recreation on publicly owned land at suitable locations.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

		Promote	Hinder	N/A
8.5	Preserve the public interest in and use of lands and waters held in public trust by the State and City.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8.6	Design waterfront public spaces to encourage the waterfront's identity and encourage stewardship.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9	Protect scenic resources that contribute to the visual quality of the New York City coastal area.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9.1	Protect and improve visual quality associated with New York City's urban context and the historic and working waterfront.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9.2	Protect and enhance scenic values associated with natural resources.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10	Protect, preserve, and enhance resources significant to the historical, archaeological, architectural, and cultural legacy of the New York City coastal area.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10.1	Retain and preserve historic resources, and enhance resources significant to the coastal culture of New York City.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10.2	Protect and preserve archaeological resources and artifacts.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

G. CERTIFICATION

The applicant or agent must certify that the proposed activity is consistent with New York City's approved Local Waterfront Revitalization Program, pursuant to New York State's Coastal Management Program. If this certification cannot be made, the proposed activity shall not be undertaken. If this certification can be made, complete this Section.

"The proposed activity complies with New York State's approved Coastal Management Program as expressed in New York City's approved Local Waterfront Revitalization Program, pursuant to New York State's Coastal Management Program, and will be conducted in a manner consistent with such program."

Applicant/Agent's Name: Department of Sanitation, Steven N. Brautigam

Address: 125 Worth Street, Room 706, New York, NY 10013

Telephone: 646-885-4685 Email: sbrautig@dsmnyc.gov

Applicant/Agent's Signature: Steven Brautigam

Date: 11/5/2018

Submission Requirements

For all actions requiring City Planning Commission approval, materials should be submitted to the Department of City Planning.

For local actions not requiring City Planning Commission review, the applicant or agent shall submit materials to the Lead Agency responsible for environmental review. A copy should also be sent to the Department of City Planning.

For State actions or funding, the Lead Agency responsible for environmental review should transmit its WRP consistency assessment to the Department of City Planning.

For Federal direct actions, funding, or permits applications, including Joint Applicants for Permits, the applicant or agent shall also submit a copy of this completed form along with his/her application to the [NYS Department of State Office of Planning and Development](#) and other relevant state and federal agencies. A copy of the application should be provided to the NYC Department of City Planning.

The Department of City Planning is also available for consultation and advisement regarding WRP consistency procedural matters.

New York City Department of City Planning

Waterfront and Open Space Division
120 Broadway, 31st Floor
New York, New York 10271
212-720-3696
wrp@planning.nyc.gov
www.nyc.gov/wrp

New York State Department of State

Office of Planning and Development
Suite 1010
One Commerce Place, 99 Washington Avenue
Albany, New York 12231-0001
518-474-6000
www.dos.ny.gov/opd/programs/consistency

Applicant Checklist

- Copy of original signed NYC Consistency Assessment Form
- Attachment with consistency assessment statements for all relevant policies
- For Joint Applications for Permits, one (1) copy of the complete application package
- Environmental Review documents
- Drawings (plans, sections, elevations), surveys, photographs, maps, or other information or materials which would support the certification of consistency and are not included in other documents submitted. All drawings should be clearly labeled and at a scale that is legible.
- Policy 6.2 Flood Elevation worksheet, if applicable. For guidance on applicability, refer to the WRP Policy 6.2 Guidance document available at www.nyc.gov/wrp

A. INTRODUCTION

The City of New York is proposing to establish and implement a commercial waste zone (CWZ) Program across the five boroughs of the City consisting of 20 zones with 3 to 5 private carters operating per zone (the “Proposed Action”).

The Proposed Action would be implemented throughout the City, including in areas within the City’s Coastal Zone Boundary and, therefore, the Proposed Action is subject to review for consistency with the policies of the Waterfront Revitalization Program (WRP). The WRP includes policies designed to maximize the benefits derived from economic development, environmental preservation, and public use of the waterfront, while minimizing the conflicts among those objectives. The WRP Consistency Assessment Form lists the WRP policies and indicates whether the Proposed Action would promote or hinder a particular policy, or if that policy would not be applicable. This section provides additional information for the policies that have been checked “promote” or “hinder” in the WRP Consistency Assessment Form.

B. CONSISTENCY OF THE PROPOSED ACTION WITH WATERFRONT REVITALIZATION PROGRAM POLICIES

Policy 7: Minimize environmental degradation and negative impacts on public health from solid waste, toxic pollutants, hazardous materials, and industrial materials that may pose risks to the environment and public health and safety.

Policy 7.3: Transport solid waste and hazardous materials and site solid and hazardous waste facilities in a manner that minimizes potential degradation of coastal resources.

DSNY is proposing to enact a CWZ Program to convert the current open market to a zoned system for commercial waste collection. The CWZ Program is intended to reduce the existing overlap of commercial carting routes and enhance efficiency, worker and pedestrian safety, transparency in contracting, and customer service. It will also further the City’s recycling and sustainability goals and reduce truck traffic and associated air, noise and greenhouse gas emissions. Currently, New York City’s commercial waste system is an open market, regulatory-based system in which private service providers, licensed and overseen by the Business Integrity Commission (BIC), collect waste and recyclables from commercial businesses and compete for contracts with each business. The Proposed Action would establish a CWZ Program that would create geographic zones with a limited number of service providers licensed to operate within each zone. Environmental impacts from commercial waste carting will be reduced. Therefore, the Proposed Action would promote Policy 7.3. *

APPENDIX C

A. VEHICLE MILES TRAVELED BASELINE METHODOLOGY

Vehicle Miles Traveled (VMT) denotes the number of miles that all carting trucks drive to collect and unload waste each day. A single route begins at the garage or truck yard, continues to each customer for waste collection, then to the transfer station or disposal facility for waste disposal/removal, and ends back at the garage. All route distances for the carting trucks are summed to calculate VMT. VMT is used as a key indicator in assessing the environmental burdens, including with regard to traffic, air quality, noise, and greenhouse gas emissions, of the current system. As such, changes to carting truck VMT can be estimated to understand the environmental benefits of creating a zoned system. A zoned system will reduce VMT, and thus, reduce truck traffic, reduce vehicle exhaust, reduce greenhouse gas emissions, reduce noise, and improve safety.

A baseline analysis was performed to estimate the current VMT for 72 carters that service NYC and reported information to the New York City Business Integrity Commission (BIC) through a Commissioner Directive on February 22, 2018 and March 7, 2018. The BIC directive collected routing data (2018 Private Carter Routing Data) that covers two separate weeks of service in early and mid-March 2018 where each carter was obligated to report only one full week of service in either period.

The raw 2018 Routing Data was cleaned to collect relevant information including dates, routes, carter names, carter BIC ID numbers, customer names, customer addresses, types of waste collected, garage locations, transfer station or disposal facility locations, and sequences for collection. Customer addresses were geocoded using either HERE Maps Geocoding API or Google Maps Geocoding API. Routes were sequenced from the garage to first customer, customer to customer, last customer to transfer station or disposal facility, and transfer station or disposal facility back to garage. Roll-on, roll-off containers were included in the routing data and are counted as their own route.

VEHICLE MILES TRAVELED CALCULATION METHODOLOGY

Once the sequence orders for each route were determined, the VMT for the baseline scenario was calculated using HERE Maps Geocoding API. This tool was utilized because it is a commercial leader in serving the freight and transportation logistics market, generates routes that avoid roads prohibiting trucks, and prioritizes fastest route time over distance. If a carter submitted GPS data in addition to a list of businesses in a route, the GPS data was used instead of the calculated route. There were approximately 34.5 percent routes for which VMT was calculated directly through GPS data.

VEHICLE MILES TRAVELED BASELINE RESULTS

For each carter, the full week of routing data in either early March or mid-March 2018 was used to determine the baseline. Since there was a snowstorm in early March that curtailed waste collection operations, carters reported the days within the range of March 4 and March 10 and

NYC Commercial Waste Zone Program

supplemental days between March 11 and March 17, 2018 that they were fully operational, reporting data for one full-week service report. The total VMT across the carter-reported days of these weeks was summed to determine the total VMT of a specific day. Weekend data was not always properly documented by carters, so the weekday VMTs only were averaged to get the daily VMT. Weekdays cover the majority of routes operated by carters. The analysis resulted in an average of approximately 66,000 miles driven per day by the 72 carters.

**Table 1
Illustration of Carter's Routing Data Reported Days**

Carter	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
1	1st week	1st week	2nd week	1st week	1st week	1st week	1st week
2	2nd week	2nd week	2nd week	1st week	1st week	No report	No report
Sum	A	B	C	D	E	F	G
Note: Daily VMT = (A+B+C+D+E)/5							

**Table 2
Weekly and Daily Average Vehicle Miles Traveled (2018 Routing Data)**

Day	Total Vehicle Miles Traveled	Total Routes
Monday	66,600	550
Tuesday	65,400	490
Wednesday	64,200	500
Thursday	73,300	480
Friday	60,300	480
Overall Daily Average	66,000	500

The data shows a significant overlap of collection routes in New York City, with some city blocks having as many as 400 garbage trucks pass by in one day. The overlap in routes was initially identified in the City’s 2016 Private Carting Study and has been reaffirmed through the current VMT baseline analysis.

PICKUP PATTERNS

Customers indicated that they value carters that can provide service at a precise time specified by the customer. The 2018 Routing Data was analyzed to determine the current pickup patterns in the City. Most waste pickups, 77.1 percent, occur overnight between 8:00 PM and 6:00 AM. Daytime pickups are between 6:00 AM and 8:00 PM and are 22.9 percent of all pickups. However, this pattern varies by borough. In Staten Island, for example, only 1 percent of pickups occur during the day. Nighttime pickups are further divided into three timeframe segments, early night (8:00 PM–10:00 PM), containing 15.3 percent of pickups; midnight (10:00 PM–2:00 AM), containing 35.1 percent of pickups; and early morning (2:00 AM–6:00 AM), containing 26.7 percent of pickups.

**Table 3
Overall Pickup Timeframe Distribution**

Pickup Timeframe	Timeframe Distribution	Percentage of Pickups
Daytime	6:00 AM–8:00 PM	22.9
Nighttime	8:00 PM–6:00 AM	77.1
Early Night	8:00 PM–10:00 PM	15.3
Midnight	10:00 PM–2:00 AM	35.1
Early Morning	2:00 AM–6:00 AM	26.7

B. VEHICLE MILES TRAVELED SIMULATION METHODOLOGY

One of the main goals of the CWZ Program is to reduce commercial carter truck VMT. The objective of the VMT simulation was to calculate the impact of potential zone designs on VMT reduction. Additional variables were included in the simulation to reflect inefficiencies unique to commercial collection, as well as collection within a zoned system with a limited number of carters. These variables were pickup patterns and the number of carters operating in a zone, which results in routing inefficiency due to competition for customers.

The same cleaned version of the 2018 Routing Data used in the baseline case was used for the customers in the VMT simulated case. In order to determine the new routes for the various zone design scenarios, several steps had to be taken to create the routes before calculating their associated VMT. These steps were as follows:

1. Customers were divided into daytime and nighttime pickups based on their pickup time identified in the baseline case (e.g., a customer that gets their waste picked up around 11 PM in the baseline case is considered a nighttime pickup in the simulated case). Daytime and nighttime customers were treated as independent of one another.
2. Customers were then grouped into customer clusters based on customer location. This was done separately for daytime and nighttime customers. The clustering process includes random assignment of customers within a cluster to a hypothetical carter to simulate the impact of competition for customers.
 - a. For exclusive zones (one carter per zone), customers were grouped into clusters of approximately 123 customers per cluster. This number was chosen because the median number of customers per route in the 2018 Routing Data baseline case was 123 customers. All clusters in the zone are assigned to a single carter.
 - b. For nonexclusive zones with N number of carters (where N is greater than 1), customers were grouped into clusters with approximately $123 * N$ customers per cluster (e.g., if 2 carters operated in a zone, then each cluster would include approximately 246 customers.) Within each customer cluster, customers were randomly assigned to one of the zone's hypothetical carters. It was assumed that carters within a hypothetical nonexclusive zone have equal market share.
3. Each carter's individual clusters were sequenced into routes. Daytime clusters were directly converted into sequenced routes. To further incorporate the impact of requested pickup times by customers, nighttime customers across a cluster were randomly divided in early night, midnight, and early morning service timeframes. In the sequencing simulation, customers within the early night segment are serviced, then the customers within the midnight segment, and then customers within the early morning segment. This sequencing simulates the behavior of carters going back and forth between areas within the course of a night to service customers with different pickup time needs.
4. Garages and transfer stations or disposal facilities were randomly assigned to each route for multiple iterations. An average distance of all the iterations was used for the journey from garage to first customer, last customer to transfer station or disposal facility, and transfer station or disposal facility to garage.
 - a. The garage was assigned at random from the nearest ten garages of all carters to the centroid of the zone.

NYC Commercial Waste Zone Program

- b. The transfer station was assigned at random proportional to transfer station or disposal facility usage rates seen in the baseline case.

Once the routes were defined, the route connections and VMT for each route were calculated using the same methodology used in the baseline case and described under Vehicle Miles Traveled Calculation Methodology. This simulation was done six times to account for slight variations between model runs. The final VMT results is the average number of the six simulations.

For the City's CWZ Program—a non-exclusive system of 20 geographic zones permitting at least 3 but no more than 5 carters operating within each zone—the simulated VMT analysis results in approximately 31,000 miles driven per day. This is a 53 percent reduction over the current condition in the City. *

APPENDIX D

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Permits, Region 2
47-40 21st Street, Long Island City, NY 11101
P: (718) 482-4997 | F: (718) 482-4975
www.dec.ny.gov

April 8, 2019

Abas Braimah
NYC Department of Sanitation
125 Worth Street, Room 708
New York, NY 10013
cwzcomments@dsny.ny

Re: Commercial Waste Zone Program DGEIS

Dear Mr. Braimah,

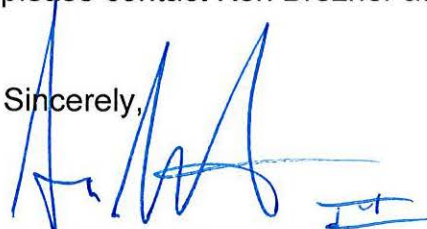
As an interested party, the New York State Department of Environmental Conservation (NYSDEC) offers the following comments on the Draft Scope of Work for the Commercial Waste Zone (CWZ) Program DGEIS.

1. In light of DSNY and BIC having no additional power/authority, what will be the realistic checks and balances to ensure there will be no fraud or impropriety within these limited competition zones?
2. The DGEIS should address how the collection of recyclables/organic waste is handled by this system.
3. The DGEIS should detail the specific methodology for the issuance of the contracts in the limited competition zones.

Regarding #1, while we understand there are proposals for possible future legislation, this should be discussed in the DGEIS. While we understand the answers to #2 and #3 will be discussed in future RFPs, the DGEIS should discuss performance standards that NYC is looking for.

If you have any questions on these comments, please contact Ken Brezner at (718) 482-4896.

Sincerely,



Stephen A. Watts III
Regional Permit Administrator

EC:
Ken Brezner, DMM
Joseph O'Connell, DMM
Denise Grattan, DEP



Department of
Environmental
Conservation

Manhattan Community Board Five

Vikki Barbero, Chair

450 Seventh Avenue, Suite 2109
New York, NY 10123-2199
212.465.0907 f-212.465.1628

Wally Rubin, District Manager

March 13, 2019

Via Email: cwzcomments@dsny.nyc.gov

Abas Braimah
New York City Department of Sanitation
Bureau of Legal Affairs
125 Worth Street, Room 708
New York, New York 10013

Re: Draft Generic Environmental Impact Statement (“DGEIS”) for the Proposed New York City Commercial Waste Zone Program

Dear Mr. Braimah:

We write on behalf of the Budget, Education and City Services Committee of Manhattan Community Board Five (cb5). As you know, our Board – like our counterpart community boards across the City - is charged with an important advisory role in shaping the character of our district and working with elected officials and government agencies to ensure that city services run smoothly.

In furtherance of the Board’s responsibility the Committee is reviewing the proposed New York City Commercial Waste Zone Program. We were pleased to hear a presentation from Justin Bland, the Department’s Director of Commercial Waste Zoning, at a Committee meeting. Several stakeholders attended the meeting and expressed their views to the committee members and other stakeholders. As far as we know, CB5 is the only community board to take up a review of the proposed program.

We appreciate the Department’s commitment to community outreach and engagement and acknowledge the extensive hours already logged, specifically by Mr. Bland, to review the proposal with all stakeholders. Our committee members also endorse the goals underlying the proposal, which are:

- **Zero Waste:** Reduce commercial waste disposal and incentivize recycling.
- **Environmental Health:** Reduce truck traffic throughout the city to reduce air pollution and improve quality of life.
- **Pricing:** Provide fair, transparent pricing with low prices for businesses.
- **Customer Service:** Strengthen customer service standards and establish accountability.

- **Health and Safety:** Improve training and safety standards to make the industry safer for workers and the public.
- **Labor and Worker Rights:** Improve industry labor standards and uphold worker rights.
- **Infrastructure and Waste Management:** Prioritize investments in clean, modern fleets and facilities that make up a reliable, resilient, and sustainable waste management system.
- **Robust, Competitive Industry:** Create a system that works for carters of all sizes and prevents overreliance on any single company.

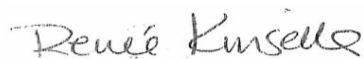
At our public meeting and through additional outreach with affected stakeholder groups and representatives we've found general agreement with these goals but a clear lack of agreement whether the City's plan will contribute significantly to their achievement. In fact, at this point in our investigation, other than Mr. Bland's statement of support for the plan, not one stakeholder or stakeholder representative has endorsed it to us.

We understand several stakeholder representatives have suggested the Department extend the review and hearing process on the DGEIS. While we appreciate the need to keep the process on track, given the massive impact this program will have on the businesses, customers and environment in CB 5 and elsewhere, we see value in additional Department outreach and stakeholder engagement.

The Department will need support from all these stakeholder groups to implement any program successfully and every stakeholder wants whatever next steps the City takes to have the best possible opportunity to succeed. **For this reason, we respectfully urge the Department to approve requests to extend the review and hearing process on the DGEIS.**

Thank you for your consideration.

Very truly yours,



Renee Kinsella
Chair, Budget, Education and City Services

MANHATTAN COMMUNITY BOARD FIVE

Vikki Barbero, Chair

450 Seventh Avenue, Suite 2109
New York, NY 10123-2199
212.465.0907 f-212.465.1628

Wally Rubin, District Manager

April 5, 2019

Via Email: cwzcomments@dsny.nyc.gov

Abas Braimah
New York City Department of Sanitation
Bureau of Legal Affairs
125 Worth Street, Room 708
New York, New York 10013

Re: Draft Generic Environmental Impact Statement ("DGEIS") for the Proposed New York City Commercial Waste Zone Program

Dear Mr. Braimah:

On behalf of the Budget, Education and City Services Committee of Manhattan Community Board Five (CB5), I am pleased to submit these comments on the DGEIS for the proposed New York City Commercial Waste Zone. As you know, our Board – like our counterpart community boards across the City - is charged with an important advisory role in shaping the character of our district and working with elected officials and government agencies to ensure that city services run smoothly.

We appreciate the Department's commitment to community outreach and engagement and acknowledge the extensive hours already logged to review the proposal with all stakeholders and thank the Department for extending the DGEIS comment period.

Our committee members also endorse the goals underlying the proposal, which are:

Zero Waste: Reduce commercial waste disposal and incentivize recycling.

Environmental Health: Reduce truck traffic throughout the city to reduce air pollution and improve quality of life.

Pricing: Provide fair, transparent pricing with low prices for businesses.

Customer Service: Strengthen customer service standards and establish accountability.

Health and Safety: Improve training and safety standards to make the industry safer for workers and the public.

Labor and Worker Rights: Improve industry labor standards and uphold worker rights.

Infrastructure and Waste Management: Prioritize investments in clean, modern fleets and facilities that make up a reliable, resilient, and sustainable waste management system.

Robust, Competitive Industry: Create a system that works for carters of all sizes and prevents overreliance on any single company.

Manhattan Community District 5 is the core of the Central Business District of Manhattan and has an ever-transforming collection of large and small commercial, light-manufacturing and entertainment/cultural businesses, as well as residential neighborhoods. This proposal will have massive impacts on the businesses, customers and environment of CB5, as the Department acknowledged in the DGEIS. At our public meeting and through additional outreach with affected stakeholder groups and representatives we have found general agreement with these goals but a clear lack of agreement whether the City's plan will contribute significantly to their achievement, and many questions about operational and transition issues.

We appreciate that the Department expects to address many of these operational and transition questions during the RFP process, and to the extent our comments below cannot be addressed in the DGEIS we suggest the Department consider additional stakeholder engagement as it prepares for the City Council legislative process to authorize the CWS program.

Routing Data. In January we asked the Department to address several questions about the data, including the vehicle miles traveled analysis. We pointed out, and have been advised by other stakeholders, that the routing data may not provide a sufficient basis on which to base this major change in public policy. The DGEIS does not address this point directly, but instead simply states that the routing data was collected between March 4, 2018 and March 17, 2018. The Department's Response to the Comments on the DSOW provides further insight that the Department's proposal is based on collection routes and schedules requested from carriers for the period of March 4-11, 2018, but that, due to a snowstorm impacting collection activities from March 6-March 8, 2018 carters were also directed to provide information for the dates of March 13-March 15, 2018.

We recommend the Department confirm with the Business Integrity Commission (BIC) that it exercised its authority to audit the drivers' route trips and that, in the opinion of the BIC, the routing data is a fair and accurate representation of the current routes. We recommend the Department then confirm the results of the BIC audit with the carters, or devise another method to solicit and report accurate data. The entire exercise proposed in the CWZ is premised on this data and it warrants further attention.

No Action and Proposed Action VMT. We recommend the DGEIS contain a more thorough analysis of exactly how the increased efficiencies from the CWZ were calculated. While we understand the logic that limiting route lengths will reduce VMTs, the DGEIS does not set out the calculation, instead simply concluding, “. . . the increased efficiency coupled with the increased diversion to recycling and organics would result in an overall decrease of overlapping trucks along road segments which would result in decreased VMT within New York City and region-wide for travel to transfer stations and garages. . .” DGEIS, page 5-3. As the entire exercise proposed in the CWZ is premised on this calculation it warrants further elucidation.

Governance and Administration. The proposal calls for the creation of a Department of Sanitation Division of Commercial Waste to administer the program, along with the BIC. We recommend that the authorizing legislation set out a clear organizational structure and delineation of responsibilities to promote communication among city agencies (e.g., 311 operators can effectively route and log complaints of missed pickups or usurping of duties), as well as communications between DSNY & BIC and private carters, businesses, residents, and community groups. DSNY should also consider creating Community Advisory Boards for the program based on borough or zone. This will further ensure accountability, transparency, and protect all those involved in the program from price manipulation or the malfeasance of one bad actor.

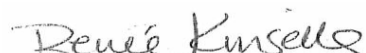
Operational Issues during and after the Transition. Our community district contains perhaps the highest density of commercial and office spaces in the city. Unlike a residential generator, these commercial generators depend on strict adherence to the pick-up times and frequency they have negotiated so they can meet other commercial and regulatory requirements. The DGEIS states that current pick-up times and frequency of pick-ups “would be expected to remain the same as under the No Action condition” but this does not provide sufficient assurance to these businesses. We recommend that the authorizing legislation require the Department to provide not less than the same level of service to each current user. In addition, we recommend the Department encourage CWZ zone winning bidders to subcontract with micro-carters and others to provide specialized services. We commend the Department for recognizing the potential value of these micro-carters and we encourage the Department to include in the authorizing legislation a requirement that the DSNY will provide bidding assistance to carters of all sizes prior to the release of the CWZ Program RFP and during the contemplated negotiation with the winning Zone bidders.

Possible Phase-In Period. We recommend the Department consider a system to phase in a limited number of zones in each borough at the outset of the program. The results from these limited programs could be compared to pre-established benchmarks, including the VMT reductions contemplated in the DGEIS. When achieved, these results could trigger the authorization of additional zones. If not achieved, these results could be used to drive necessary changes so the program will deliver as promised. The city’s Business Improvement Districts could also act as partners in this program, and their boundaries should be considered for piloting zoned commercial waste.

Air Pollution. Manhattan Community District 5 has the highest Fine Particulate Matter (PM2.5) air pollution of any community district in the city. The proposal has our community district (CD 105) with two commercial carting zones (zones MN-03 and MN-04) within it. The proposal allows five commercial carters to operate in both of MN-03 and MN-04. Under the proposal, no other zones have as large a number of carters and no other district has two zones or 10 carters. We ask DSNY to include in the RFP for these zones a requirement of an all-electric fleet for commercial carters and their subcontractors.

Thank you for your consideration.

Very truly yours,



Renee Kinsella
Chair, Budget, Education and City Services Committee
Community Board Five



Community Board Ten

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Chair
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District Manager

April 5, 2019

Abas Braimah
NYC Dept. of Sanitation
Bureau of Legal Affairs
125 Worth Street
New York, NY 10013

Re: DGEIS NYC Commercial Waste Zone
Program (CWZ)

Dear Abas Braimah:

At a duly publicized meeting of Community Board 10, Brooklyn, held on March 18, 2019, Members voted overwhelmingly to request more information regarding the proposed CWZ program. Board Members have questions regarding the program, which I have outlined below.

1. REDUCTION TO CHOICE OF 3 CARTING COMPANIES

- a. What if establishment is dissatisfied with all 3?
- b. How will DSNY or BIC prevent 3 firms from uniting to control price?
- c. Who will regulate sub-contractors?

2. COST

- a. How much information was collected on cost reduction?
- b. Do you have data on average price point of carting costs in CD10?
- c. Was data collected on current cost by Community District or Borough?
- d. Will all zones have similar pricing structures?
- e. Fear if only "good companies" can service it will control price.

3. CONTRACTS

- a. What if business is dissatisfied with contract before one year is up?
- b. What if business fails before contract is up?
- c. What if carting company fails before contract is up?

4. RFP process

- a. Have you vetted current companies?

ERIC L. ADAMS, BOROUGH PRESIDENT

Community Board Ten

Page - 2 -

- b. Will companies in good standing have a leg up in RFP Process?
- c. Conversely, will those with a bad track record have a leg down?

5. OUTREACH

- a. What is plan for outreach?
- b. Have you met with current carting companies? Did they provide input?
- c. Can you provide information about business outreach?
- d. Will information regarding changes to carting policy be available in multiple languages?

6. BID Concerns

- a. BIDs currently grapple with improper use of corner baskets with commercial refuse dumping.
- b. Will there be a liaison to help businesses such as a Help Desk where merchants can direct questions or provide anonymous feedback?

7. ENFORCEMENT

- a. Will DSNY or BIC be in charge of enforcement?
- b. Can you describe compliance enforcement to both carting firm and merchants?

8. LOCAL LAW

Local law is referenced throughout presentation.. can you provide us the local law referred to in your presentation.

Additionally, Board Members have expressed concern about the possible impact to the cleanliness of our commercial corridors, the cost to small businesses and financial hardship on smaller successful carting companies who may not be able to survive if these changes are implemented.

Thank you for the opportunity to submit comments on the DGEIS NYC Commercial Waste Zone Program. I hope that the concerns Community Board 10 Members have raised will be considered, and we look forward to receiving a response to the questions outlined above.

Sincerely,



Josephine Beckmann
District Manager

JB:dg

cc: Hon. Justin Brannan
A. Zenteno – Bay Ridge 5th Avenue BID
B. Howe – Merchants of Third Avenue

NYC Commercial Waste Zone Program DGEIS – Written Response Comment

Introduction

The City's Draft Generic Environmental Impact Assessment (DGEIS) evaluates the potential impacts of the proposed Commercial Waste Zones program. The DGEIS analyzes a scenario in which the program divides the city into 20 waste collection zones. Each of these zones could then be awarded to three to five private carters, consortiums, and/or business brokers, each with the ability to sub-contract some of the awarded services.

The DGEIS favors Multi-Provider zones. While the DGEIS also assesses a Single-Provider zone system, it fails to provide adequate comparison between all scenarios – it does not provide enough supporting evidence and relies on inconsistent and qualitative assumptions for its conclusions.

Nonetheless, the technical analysis provided by the DGEIS persuasively demonstrates that for all quantitative measures the Single-Provider alternative better achieves the City's goals set forth in the Commercial Waste Zone plan by a wide margin. See table 3 at end of these comments.

The DGEIS incorrectly favors the Multi-Provider zone system based on flawed quantitative analyses; unsubstantiated assumptions that lead to incorrect qualitative analysis results; and overlooked the fact that Single-Provider zones would create the necessary policy and operational framework to achieve the City's goals. Said differently, the DGEIS appears to overstate the benefits of a Multi-Provider zone system and understates the critical benefits of a Single-Provider zones.

The DGEIS also underestimates the No-Action alternative. If more time were permitted to respond to the DGEIS, a more thorough analysis could have been completed by Action Carting. Without more time to respond, Action Carting's experts speculate that with increased/adequate enforcement and implementation on existing policies and natural market consolidation the No-Action alternative would come close to equaling the positive impacts of a Multi-Player zone system.

The quantitative analyses throughout the DGEIS are flawed and incorrect.

The DGEIS is flawed in that it overstates the vehicle-miles travelled (VMT) benefits of the Multi-Provider system over the alternatives. The quantitative analyses the DGEIS relies on are flawed and limited in scope. Since the potential positive impacts of the Single-Provider system were not analyzed to the same extent as the Multi-Provider scenario, the DGEIS simply does not present a fair comparison between the two options.



Analysis conclusions were, for the most part, based on subjective assessments that lack quantifiable metrics. Of the quantifiable metrics that were disclosed, it is clear the Single-Provider alternative would far better achieve the City's environmental, public health, and safety goals. These metrics include VMT, number of waste collection trucks, recycling diversion rates, costs, and greenhouse gas emissions.

Not surprisingly, a multiparty system does not exist elsewhere given its limitations and dilution to the single player model which governments have used to attract qualified bidders thereby providing benefits as discussed here and best pricing.

Vehicle-Miles Travelled

The transportation analysis chapter, a critical component of the assessment, is a primary example where the DGEIS did not properly explain methodologies nor fully identified the advantages of the Single-Provider alternative. Potential reductions in VMT and waste collection truck volumes were estimated using simulated routing models from Maps Truck API. However, the assumptions used in the model and the methodology were not revealed in the analysis. Similarly, the rationale for determining daily truck traffic remains unknown as it was similarly not disclosed.

The public is therefore unable to independently review and assess these assumptions, methodologies, and data sources. Moreover, subsequent impact category analyses, including air quality, noise, and greenhouse gas (GHG) emissions, rely heavily on the results disclosed in the transportation chapter analysis and therefore inherit several fundamental flaws.

The analysis assesses the potential reduction in VMT under the Multi-Provider scenario using the assumption that routes would be created based on customer locations. However, the clustering methodology was not disclosed. If the DGEIS calculations used the same methodologies as the Commercial Waste Zones plan, each route within a waste collection zone would serve a discrete geographic sub-area of clustered customers.

Under this narrow assumption, projected VMT reductions are exaggerated. In reality, the proposed program has no mechanism in place to prevent routes from serving dispersed customer within a zone. The DGEIS does not account for the likelihood that each of the awarded private carters will have routes that span an entire zone while servicing minimal number of customers – greatly increasing VMT and reducing efficiency.

As a result, the DGEIS overstates the VMT benefits under the Multi-Player option and dilutes the greater potential reductions of VMT under the Single-Player alternative. Under the Single-Player scenario, private carters will have the optimal highest density collection routes, creating a more efficient waste removal system overall.

The assumption that private carters in a Multi-Provider zone would all have equal market share likely results in an analysis that overstates VMT benefits under the Multi-Provider scenario. Awarded private carters under that scenario would have the same competitive dynamic as the No Action option, which is

to gain as many customers as possible thereby creating the same inefficiencies as today, e.g., excessive trucks or vehicle miles, service challenges due to customer churn, reduced fleet investment.

The comparison between the Multi-Provider option and the No-Action option is also flawed in that the DGEIS assumes that under No Action there will be no upgrades in standards and service other than those already announced. This is a specious assumption that Action rejects given the dynamism and change occurring in the industry.

Under the Single-Provider scenario, the awarded private carter would have clarity in their market share, and could divert resources to further increase collection efficiency, fleet quality, customer service and innovation, while improving productivity. This clarity would greatly improve cost and availability to capital.

The DGEIS assumes the diversion rates for recyclables and organics would increase at the same rate under the Single-Provider and Multi-Provider alternatives. However, the DGEIS does not account for the same potential increase in VMT as a result of the assumed increased diversion rate. Again, a flawed assumption.

Under the Multi-Provider scenario, redundant collection schedules and routing are likely. This is due to the fact each of the awarded carters in a given collection zone may have their own separate division or subcontracting services for recyclables and organic waste. Greater redundancy in collection time and routing would directly impact city-wide VMT since more collection trucks would cover the same customers on the same routes. The Single-Provider alternative, on the other hand, would have one carter per zone and would retain the option to subcontract out recyclable and organics collection services. The efficiency gain in collection schedule and routing would further reduce overall VMT.

Action Carting performed an analysis of VMT generation using the RouteSmart extension on ESRI's ArcGIS platform. The study analyzed the proposed MN-4 waste collection zone, which includes approximately 80 percent of the same Midtown Manhattan CBD case study area analyzed in the DGEIS. The results of the analysis showed that in the MN-4 waste collection zone, the Single-Provider scenario could have the potential to further reduce VMT by 45 percent when compared to the Multi-Provider scenario.¹ The number of private carting trucks required to service the same waste collection zone is also expected to be further reduced under the Single-Provider scenario since the awarded carter can better achieve economy of scale and maximize route efficiency. The significant potential in VMT reduction as shown in the analysis illustrate the need for further disclosure and transparency of the routing and calculation methodologies used in the DGEIS impact analyses. Table 1: VMT Comparison between Multi-Provider and Single-Provider Scenarios in MN-4 Waste Collection Zone

¹ The Action Carting analysis created a randomized distribution of pick-up locations within the MN-4 waste collection zone, based on the assumption that each block face has at least one pick-up location. Where blocks were identified to be entirely residential or has no commercial/office use, the pick-up location was eliminated from the collection route. Under the Multi-Provider scenario, pick-up locations were randomly assigned to 5 different carters with overlapping routes to simulate the expected implementation outcome. This independent analysis did not account for distances travelled outside of the waste collection zone and focused only on the private carting operations within the MN-4 waste collection zone.

	Multi-Provider		Single-Provider	% Difference between Multi-Provider and Single-Provider
VMT/day	183		101	45%
Source: Action Carting				

Air Quality and Noise

The DGEIS discussed potential air quality emissions and noise pollution impacts in qualitative terms and relied entirely on the results and assumptions from the transportation analysis chapter. Based on overall improvements in efficiency, reductions in VMT and fleet size, the Single-Provider option is expected to further reduce harmful air quality emissions and noise pollution impacts compared to the Multi-Provider scenario.

In addition, the DGEIS did not assess potential impacts related specifically to the private carting industry, including air quality and noise impacts within the vicinity of recycling and organic waste transfer stations. These are expected to rise as a result of the anticipated increase in diversion rates.

Greenhouse Gas Emissions

The assessment of greenhouse gas emissions impacts provided a percentage range of potential reductions with no supporting calculations or methodologies. As with air quality and noise, that assessment was based entirely on the results and assumptions from the transportation analysis chapter.

An analysis of greenhouse gas impacts, based on the DGEIS results, addresses that data gap. The results show that the Single-Provider alternative has the potential to further reduce average emissions by 15 percentage points when compared to the Multi-Provider option (see Table 2). Despite the significant gain in greenhouse gas emission reductions, the DGEIS did not even provide the full analysis methodology and results for both the Single-Provider and Multi-Provider options.

Table 2: Greenhouse Gas Emission Comparison between Multi-Provider and Single-Provider Scenarios

	Multi-Provider	Single-Provider	% Difference between Multi-Provider and Single-Provider
Greenhouse Gas Emission	Anticipated emissions decrease by 39%-66% based on VMT reduction (estimated average reduction of 54.4%)	Estimated average decrease of 69.4%	15%
Source: NYC Commercial Waste Zone Program DGEIS, CEQR No. 19DOS003Y Sam Schwartz			

Safety and Crashes

Potential impacts on traffic safety under both the Multi-Provider option and the Single-Provider alternative should be assessed and compared. According to NYPD's Motor Vehicle Collision reports, private waste collection trucks were involved in 1,543 crashes, causing 275 injuries and three fatalities in 2018. It can be safely assumed that by reducing the number of private waste collection trucks on the streets and/or their mileage, related traffic crashes would statistically decrease as well.

The Multi-Provider scenario presented in the DGEIS projects an estimated reduction of 54.3 percent in VMT and an estimated reduction of 27 percent in overall fleet size. The Single-Provider alternative would further reduce VMT generated by waste removal trucks by an additional 15 percent and would reduce overall fleet size by an additional seven percent.

The Single-Provider alternative with its greater reductions in VMT and fleet size will better achieve the City's goals to reduce private carting related traffic crashes, improve safety for all street users, and support the City's Vision Zero program.

Comparing the Quantitative Results between Multi-Provider and Single-Provider Options

As a whole, the DGEIS understates the benefits of the Single-Provider alternative. However, the quantitative analysis results still show that the Single-Provider alternative is better in that it addresses most of the goals set forth in the Commercial Waste Zones plan. As seen in Table 3, VMT, total truck volumes, and air quality impacts are only some of the categories under which the Single-Provider alternative outperforms the Multi-Provider option.

The qualitative analyses throughout the DGEIS are based on unproved assumptions and are flawed, incorrect, and counter-intuitive

The DGEIS relies on qualitative assumptions that are subjective and not supported by evidence. For example, the DGEIS assumes that a lack of competition under the Single-Provider alternative would have the potential to increase costs and lead to worse customer service. However, regulated government pricing and service standards are common among utility providers. Moreover, a variation of that regulation already exists under the current commercial waste collection system through a rate cap² set by BIC. This qualitative assumption also completely ignores the benefit competitive bidding structure for waste collection zones, where the provider costs would account for 40 percent of the proposal scoring. Under the Multi-Provider alternative, there is little incentive for the carters to bid aggressively low because there is no clear route design or number of customers, thereby creating no clear winner and increased risk. This increased risks which is inherent in the Multi-Provider alternative affects the provider's costs and could impair access to capital. When costs increase, prices are driven higher.

² In any scenario, the rate cap must be eliminated. Its functions is to arbitrarily constrain pricing and thus revenue while simultaneously requiring investment with respect to safety, emissions and equipment. This is simply not sustainable. Small wonder that some companies struggle to meet even the minimum standards.

Similarly, the assumption that the collection rate of recyclables and organics would be the same under both the Multi-Provider option and Single-Provider alternative does not account for the potential of improved public communication, streamlined collection schedules, and shared collection containers. These improvements could further increase overall diversion rates, with potential impacts on truck volume and VMT.

The argument that the transitional implementation process would be logistically more challenging under the Single-Provider alternative also relies on qualitative assumptions. Contrary to the assumptions laid out in the DGEIS, the Single-Provider option could provide clarity and minimize confusion among customers during the transition period. In contrast, having multiple carters per collection zone will create unnecessary complexity and hardship for the customers.

The reliance on flawed and inconsistent qualitative assumptions throughout the DGEIS puts into question the overall analysis framework and approach to the study. Without providing supporting evidence, it is not possible to fairly compare all alternatives.

In addition, the DGEIS used flawed assumptions to evaluate a scenario where the Commercial Waste Zone program is not implemented. The DGEIS failed to consider the continuing trends of mergers and acquisitions of smaller private carting companies. Ironically, the uncertainty of zoning dried up M & A activity in New York City.

The growing complexity of this industry, along with national trends, show that small private carting operators are in decline. The introduction of new local laws further puts pressure on smaller private carting companies to upgrade equipment and comply with safety standards. Some initiatives that Action Carting alone has undertaken over the past five years include the following:

- Emission reductions with improved and cleaner engines
- Installation of side guards, safety cameras, on-board computer systems, and radios (prohibiting cell-phone usage)
- Expansion of the Second Chance Program
- Opening of a recycling facility with optical sorters
- Opening of a Safety University
- Starting a mechanics apprenticeship program
- In-classroom employee trainings
- Providing personal protection equipment

Some of these initiatives are similarly undertaken by other private carting companies, which further meets the broader city goals.

Single-Player zones better achieve public policy goals

Initiatives and programs that would further support the goals set forth in the Commercial Waste Zone plan are not recognized and considered in the DGEIS. Compared to the Multi-Provider option, the Single-Provider alternative would allow better coordinated group collection schedules and controlled pick-up

times within the collection zone. Improved collection coordination can potentially facilitate carting-free days for special events or special districts, further reducing the total VMT.

The Single-Provider alternative would also facilitate greater compliance and enforcement of City laws related to environmental sustainability, labor rights, safety, and customer service. Having multiple providers serving a single collection zone would only result in unnecessary complications for enforcement.

In addition, haulers under the Single-Provider alternative would likely be able to make greater investments (with stronger support from the investment & banking communities) in cleaner vehicles, safer equipment, and workforce training programs. They would be able to achieve greater economies of scale through the award of an entire collection zone.

Communication with regulators and the assignment of responsibilities would be more transparent and easily manageable with a single waste provider or consortium led by a prime carter. Furthermore, customers under the Single-Provider alternative would benefit from a single point of contact for all waste collection related inquiries or complaints.

Insufficient information about the competitive RFP bidding process

Assumptions related to the structure and parameters of the competitive zone bidding process under both the Multi-Provider option and the Single-Provider alternative lack clarity. Neither are they sufficiently disclosed to adequately assess the trade-offs. While some goals are delineated somewhat hazily in the DGEIS, the public and stakeholders need a substantive dialog and even debate to define the city's priorities and thus those of the companies seeking awards. Will the city place greater value on service, safety, labor standards, innovation and sustainability over cost? How will the ever changing conditions in the recycling market and thus the economics of waste industry be managed and who will manage it? The past 18 months have seen profound changes to cost and in what can and cannot be recycled to scale. These are not theoretical points, but will be determine the success of the bidding process.

Another primary concern is how service providers will be able to accurately prepare a proposal bid when the size of the market is unknown when multiple providers are assigned a single zone. Providers are unable to account for economies of scale and the associated cost savings when they are uncertain of their market share. Under the Single-Provider alternative, providers would know the market parameters and be able to provide the most cost-competitive bids along with better defined strategies for service, safety, labor standards, innovation and sustainability.

Conclusion

The inconsistent and unsupported assumptions and methodologies throughout the DGEIS prevent a thorough and objective evaluation between the Multi-Provider option and the Single-Provider alternative. Implementing the Single-Provider alternative would help the City move closer towards achieving the Commercial Waste Zones plan goals listed below:

1. Environmental Quality + Public Health
Reduce truck traffic throughout the City to reduce air and noise pollution and improve quality of life for New Yorkers.
2. Zero Waste
Reduce commercial waste disposal and incentivize recycling to conserve resources and reduce greenhouse gas emissions.
3. Pricing
Provide fair, transparent pricing with competitive prices for businesses large and small.
4. Customer Service
Strengthen customer service standards and establish accountability.
5. Health and Safety
Improve training and safety standards to make the industry safer for workers and the public.
6. Labor and Worker Rights
Improve industry labor standards and uphold worker rights.
7. Infrastructure and Waste Management
Prioritize investments in clean, modern fleets that make up a reliable, resilient, and sustainable waste management system.
8. Robust, Competitive Carting Sector
Create a system that works for carters of all sizes and prevents overreliance on any single company.

Table 3: Comparison Between the Multi-Provider Option and the Single-Provider Alternative by Impact Category

	No Action Condition	Multi-Provider	% Reduction from No Action Condition	Single-Provider	% Reduction from No Action Condition	% Difference between Multi- and Single-Provider	Issue
VMT/day	Midtown: 810 Flatbush/Nostrand: 49 College Point: 499	Midtown: 355 Flatbush/Nostrand: 26 College Point: 200	Midtown: -56% Flatbush/Nostrand: -47% College Point: -60%	Midtown: 170 Flatbush/Nostrand: 18 College Point: 171	Midtown: -79% Flatbush/Nostrand: -63% College Point: -66%	Midtown: -23% Flatbush/Nostrand: -16% College Point: -6%	
Trucks/day	Midtown: 174 Flatbush/Nostrand: 46 College Point: 85	Midtown: 104 Flatbush/Nostrand: 24 College Point: 32	Midtown: -40% Flatbush/Nostrand: -48% College Point: -62%	Midtown: 87 Flatbush/Nostrand: 18 College Point: 36	Midtown: -50% Flatbush/Nostrand: -61% College Point: -58%	Midtown: -10% Flatbush/Nostrand: -13% College Point: +4%	
Overall Fleet size	1,014	739	-27%	674	-34%	-7%	
GHG Emission	Anticipated minor increase to GHG due to increased VMT associated with increased diversion rate. Increase in recycling and organics diversion is expected to partially/fully offset GHG increase	Anticipated emissions decrease by 39%-66% based on VMT reduction (estimated average reduction of 54.4%)		Estimated average decrease of 69.4%			No quantitative comparison presented. GHG emissions could be anticipated to be reduced an additional 15% on average based on the reduced VMT in exclusive zones.
Air Quality	Anticipated decrease in fleet-wide emissions with minor increase to pollutant emissions due to increased VMT associated with increased diversion rate	Anticipated emissions decrease based on VMT reduction		Anticipated emissions further reduced based on VMT reduction			No quantitative analysis presented.
Diversion (Recyclables/Organics)	30% / 4%	38% / 6%		Assumed to be same despite potential for improved consistency in communication, scheduling, and collection materials			No quantitative comparison presented
Noise	Screening Level Assessment						No quantitative analysis presented
Carter Expenses	\$661,386,787	\$561,267,260	-15%	\$552,482,462	-16%	-1%	
Industry Employees	2,600	2,631	+1%	2,592	-0.3%	-0.7%	
Cost to Customers (per 100 lbs.)	NYC BIC Rate Cap: \$15.88 NYC Median Rate: \$11.66	Minimum viable price for carting services: \$8.49*		Anticipated price increase due to lack of competition Appropriate price regulation not considered.			*Based on minimum rates needed to continue operating

Source: NYC Commercial Waste Zone Program DGEIS, CEQR No. 19DOS003Y

March 11, 2019

Acting Commissioner Steven Costas
NYC Department of Sanitation
125 Worth Street
New York, NY, 10013

Dear Acting Commissioner Costas,

As the City's leading real estate trade association, the Real Estate Board of New York (REBNY) respectfully requests that the NYC Department of Sanitation (DSNY) extend its deadline to accept written comments on the NYC Commercial Waste Zone Program - Draft Generic Environmental Impact Statement (DGEIS). The DGEIS was published on February 22, 2019 and, currently, written comments will be accepted until March 25, 2019. For the reasons discussed below, we believe additional time is necessary for REBNY, as well as other members of the public, to provide written comments.

Extending the DGEIS written comment deadline will ensure that all interested parties are able to gather complete data and provide meaningful responses to the DGEIS. DSNY's proposal intends to restructure how certain types of waste are collected from commercial buildings (including REBNY's members) in all five boroughs. Accordingly, the DGEIS is a complex document that includes highly technical analyses in support of complicated legislative and regulatory changes that will impact the entire City. Given the importance of the issues that the NYC Commercial Waste Zone Program presents for REBNY members and the City as a whole, we believe it is critical that interested parties like REBNY be given adequate time to fully review, evaluate and analyze the DGEIS and provide a thoughtful response that will help improve the DGEIS and, ultimately, the City's policymaking process. It is especially vital for REBNY to have an adequate opportunity to consult regarding the DGEIS with members who rely upon cost-effective and efficient delivery of carting services as part of their business operations.

For this reason, we respectfully ask that you provide a 60 day extension to the written comment period.

Thank you for your consideration.

Sincerely,

John Banks



cc:
Abas Braimah
Bureau of Legal Affairs

THE ACTION ENVIRONMENTAL GROUP, INC.

My name is Ron Bergamini. I am the CEO of Action Environmental Group, the parent company of Action Carting, NYC's largest hauler of solid waste & recycling materials. We will be submitting further substantive written comments on the draft environmental impact statement.

Today I would like to comment on a single topic – the choice between single hauler (“single”) and multiple hauler zones (“multiple”).

Of the two choices, Action strongly supports the single model. The single model produces the greatest reduction in VMT's, safer operations, the highest potential for recycling, clearest accountability, easiest integration with other City services, and fair pricing. The alternative, a multiple model, would compromise all of these goals. This option seems no better than today's while essentially creating 20 mini New York Cities.

Achievement of the City's environmental and safety goals is directly correlated with a reduction in VMT's. Maximum reduction in VMT's can only be achieved by the single model. As the draft EIS shows, the multiple model pays a huge price in extra VMT's, while the single is by far more efficient.

Public safety will be greater with the single model. Fewer miles driven will likely result in fewer accidents.

A single hauler will be a more efficient recycler. More efficient routes and far easier scheduling will enhance the identification, separation and collection of recyclables. For example different days could focus on different recycling streams.

The single model is most easily integrated with other City services. A single hauler allows for a one-call system that can assist the police in emergencies; manage street uses like parades, street fairs and street closings; respond to noise complaints; and adjust to traffic, construction and store deliveries. Just one potential example – we could arrange to keep garbage trucks out of the theater district on Wednesday matinees.

The single model will have the most transparent pricing, functioning in many ways like a utility. The hauler will be selected through a very competitive process with price likely being the determining factor. Meanwhile, the certainty of an entire zone provides the single hauler with economies of scale for important investments like cleaner fleets, worker safety and training programs, and better customer service.



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The single model will enable programs and policies that only work in an “all-in” scenario, particularly with emerging innovative new ways to increase recycling diversion and better manage and centralize pickup on the street. These innovations will in turn improve neighborhood quality-of-life as well as the environment.

Action, for example, along with the leaders in the industry, has begun to use advanced systems to plan and manage routes in real time. A single hauler assigned to a single zone and using these advanced techniques will reduce the total miles driven to the absolute minimum, reduce accidents, enhance efficiency and keep prices fair.

Successful franchise markets exist throughout the United States in a wide variety of urban markets. All of the successful franchise zones follow a single hauler model, are built with clearly defined service and safety standards, and are based on competitive, transparent and well-defined pricing.

The City’s RFP process offering the single model will draw local and national interest from experienced, well capitalized operators intent on offering highly competitive pricing. Everyone will be playing to win. The competition will be fierce, particularly with the priorities of service, sustainability & safety.

Action supports and advocates continued innovation in our industry. Safely collecting and disposing of waste throughout the City is a great responsibility. Those who do the hard work each and every night through all sorts of weather must be allowed to do so professionally, with fair wages and within an appropriate and supportive work environment. We are proud to be part of this discussion and remain committed to the City of New York sharing its stated goals of better service, sustainability and above all, safety.

If the City determines it is necessary to implement a zoning plan to achieve its goals of better service, sustainability and safety, then let’s do it right. Make it single hauler system.

Thank you.



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Via Email: cwzcomments@dsny.nyc.gov

Abas Braimah
New York City Department of Sanitation
Bureau of Legal Affairs
125 Worth Street, Room 708
New York, New York 10013

March 13, 2019

Re: Requests for Extension of Time for Submission of Written Comments on Draft Generic Environmental Impact Statement (“DGEIS”) for the Proposed New York City Commercial Waste Zone Program, and to Schedule Additional Public Hearings on the DGEIS

Dear Mr. Braimah:

I am the CEO of Action Environmental Group, Inc., the parent company of Action Carting, the largest hauler of commercial solid waste in New York City. As such we are and have been extremely interested in New York City’s (the “City’s”) proposal to implement a commercial waste zone program and its prospective effect on our customers and the environment. We have been commenting on previous proposals and reports issued by the DSNY and will comment on the above-mentioned DGEIS to the New York City Department of Sanitation (“DSNY”). However, providing only an approximate 30-day period to review, evaluate, and prepare detailed comments based upon the simultaneously released 186-page DGEIS and the 507-page Final Scope of Work for the proposed establishment of commercial waste zones is neither adequate nor reasonable. In addition, because this proposal will affect Action and every business in the City, public hearings on the DGEIS should be held at locations in all five boroughs, rather than only in Lower Manhattan.

For these reasons, and in the interest of developing a complete record informed by a sufficient opportunity for review of the DGEIS, Action respectfully requests that the deadline for submission of comments on the DGEIS to the New York City Department of Sanitation be extended at least 60 days -- i.e., through Friday, May 31, 2019 -- to offer sufficient time for interested stakeholders to analyze the DGEIS and prepare comments

March 13, 2019

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that will help ensure a “hard look” at the environmental impacts of the Commercial Waste Zone Program.

Action also requests adjournment of the public hearings scheduled for March 14, 2019, at 125 Worth Street in Manhattan; and that new public hearings on the DGEIS be scheduled to take place in each of the City’s five boroughs.

Thank you.

Very truly yours,

Ronald S. Bergamini
CEO

April 8, 2019

THE BUILDING OWNERS AND MANAGERS OF GREATER NEW YORK'S COMMENTS ON THE DGEIS FOR THE DEPARTMENT OF SANITATION'S COMMERCIAL WASTE ZONE PROGRAM

Socioeconomic Comments

1. The Direct Business Displacement section of the Socioeconomic section should, as a worst-case scenario, determine which specific businesses would be most vulnerable to losing out in the franchising system and analyze the impact of those closures. This analysis should assume the minimum number of companies possible win franchises, and that some or all winners could be national waste handling companies currently not operating in the City.
2. In the "Commercial Waste Carters—Existing Condition" on page 3-10, the assertion that open competition leads to diminished service to businesses is incorrect. Less competition will almost certainly lead to decreased services. If a business needs special services, and none of the three carters offer it, they will have to change or discontinue operations or pay significantly more for the service. Such a reality should be reflected in the DGEIS.
3. The *Secondary Employment Market* section (p. 3-18) claims that there will be 139 additional jobs in the waste recovery sector due to supposed increases in recovery rates. But in response to a comment on the Draft Scope published in the Final Scope (response to comment 15, p. B-11 and elsewhere) on transfer station impacts, the DSNY states "The Proposed Action directly impacts operational processes related to commercial waste collection in New York City and not the disposal and/or processing of such waste." This should apply to processing recoverable materials as well, and these and any other such sections should be removed.
4. Where would the proposed additional 3% of organics go for composting and/or disposal. Where do organics from the commercial and residential programs currently go? Are residential or commercial organics disposed of in facilities, such as waste water treatment plants, with no beneficial end use?
5. The assumption that waste recovery will increase 9% prior to the proposed action is almost certainly excessive based on historic trends and certainly is not conservative. The new recycling rules have already been in place for several years, and any impact they had have likely already been seen. Similarly, capacity and other issues continue to hamper composting. Therefore, a much smaller increase of just a few percent seems more appropriate.
6. Without a commercial waste audit, the DSNY has no basis for estimating the amount of waste that could or will be diverted. A 19% increase (combining No Action and With

- Action increases) in waste diversion over the current amount, about 25%, defies credulity, and would need to be carefully justified with facts.
7. In the paragraph below table 3-7 on p. 3-20, the DGEIS erroneously states that the 5.7% increase applies to diversion, instead of to an increase in routes required to pick up 10% more recoverable material.
 8. According to the DGEIS, additional recoverable materials (recycling plus organics) that will be diverted during the No Action period and the With Action period are very similar. Under the No Action, diversion rates increase 9%, and under the With Action, they increase an additional 10%. But according to Table 3-3, the costs to carters associated with the 9% increase, in terms of purchasing new trucks and paying new workers, is just over \$15 million, while, according to Table 3-8, the costs associated with the additional 10%, is just shy of \$34 million. Why are these costs so different?
 9. The DGEIS envisions an outcome that would cause little disruption to the carting industry, suggesting that 68 zone contracts would be spread out to many existing companies, keeping many extant. This seems both unlikely and distinctly not conservative as an assumption, and it's certainly not proven by the analysis. The DGEIS needs to analyze a scenario where a minimum number of companies, including some larger companies not currently operating in the New York City market, receive all of the contracts, as some companies own waste transfer stations, some are too large already to win just one or a few zones and remain in business, and some companies will have more wherewithal to navigate the process and invest in all the upgrades in advance of starting operations (among other possible advantages). Such a scenario would harm many more NYC businesses, while those winning multiple contracts would have to raise rates higher to pay for a larger up-front investment to meet compliance requirements.
 10. According to tables 3-14 and 3-15, there would be a 27% reduction in trucks (275 total trucks) needed to collect all commercial waste between the No Action and With Action scenarios, but only a 6% reduction in field workers (121 total). Why wouldn't a reduction in trucks of 27% mean a greater loss of jobs, when the vast majority of trucks have two field workers?
 11. The Socioeconomic analysis suggests in several places that displaced waste hauling companies would change to haul other materials than commercial solid waste and recyclables (i.e., to construction and demolition waste). The DGEIS should provide evidence that there is capacity available to allow for this lateral move, and it should disclose the impact on other businesses that might be impacted by the increased competition.
 12. The Socioeconomic study produces an endless list of numbers based on a bottomless list of assumptions. But in the end, the real conclusion comes when DSNY admits "As carters would be able to set their own rate caps under the Proposed Action, exact rates at which waste would be collected are currently unknown and would be determined during the solicitation process." This uncertainty needs to be more front-and-center in the DGEIS and should play a major role in disclosing potential impacts.

Solid Waste Comments

1. The DGEIS claims that recycling plus organics collection and disposal will increase 19% in the No Action plus With Action timeperiod. In the "Consistency with the SWMP" section, the DGEIS states, without proof, that "... existing recycling and organic processing facilities within New York City and the surrounding area are anticipated to

have adequate capacity to accommodate the increase in diversion as a result of the CWZ Program” (p. 4-12). The DGEIS needs to survey capacity, especially for composting facilities, and show that there is adequate capacity to meet the increases in recoverable materials claimed in the DGEIS.

General Comments

1. In the two-year transition period, after contracts have been awarded but before the full plan is in place, those who didn't get contracts will transition to other businesses or shut down (according to the DGEIS). How will this impact commercial waste pickup? Those potential impacts need to be analyzed and disclosed.
2. If a non-exclusive zone system with 3 to 5 carters per zone is problematic in terms of risking losing quality of service, a non-exclusive system with one carter per zone is completely unacceptable. It would create monopolies with no competition and no opportunity for customers to punish bad service or high costs by changing haulers.
3. Large commercial buildings, especially those that use compactors and those that fill entire trucks, are already operating at maximum efficiency and should be exempted from the zone system so they can use haulers that meet their specific, often complex, service needs. If not, the DGEIS should explain why waste zones are needed for these buildings and how they would improve service and the environment.
4. Large commercial buildings that divert their solid waste directly to waste-to-energy facilities cannot improve on their efficiency and should be exempt from the zone system.
5. The Draft Generic Environmental Impact Statement (DGEIS) does not establish that the three neighborhoods analyzed for potential impacts characterize all neighborhoods in the City or are a worst-case scenario for each impact analysis chapter or topic.
6. It has not been proven that the three neighborhood types used throughout the DGEIS are the only types of neighborhoods in the City. Therefore, it's possible that there could be significant impacts in the City that are neither identified nor disclosed.
7. Many of the assumptions in the DGEIS, particularly in the Socioeconomic Chapter but also in the truck and VMT analysis, where waste haulers having to respond to special waste needs in a district may lead to more near-empty truck runs, are subject to high levels of uncertainty. The DSNY should commit to testing their assumptions when real data comes in and to re-do their analysis if those numbers vary significantly from assumptions. For example, when RFP responses come in, the DSNY should have a mechanism in place to review and respond if costs are higher than predicted. Similarly, if the program is implemented, if vehicle miles are higher than expected, the DSNY should review the program.
8. The assertion that “[c]ommercial business customers of carters note the lack of transparency between carters and customers in the current system” is overly-broad and for many customers, completely incorrect. BOMA/NY members do not find this to be the case.
9. Please explain how waste franchising will achieve zero waste and how long it will take. How much capacity for composting would be needed to handle all of the food waste generated in New York City? How much is available now? What can be done with soiled waste? What can be done with film plastic and other non-recyclable materials?

10. Please explain how the plan would “create a system that works for carters of all sizes and prevents overreliance on any single company.” Does such a system not exist now? One obvious potential outcome is that large corporations that do not currently operate in the City will win all the contracts. How would such a scenario create a system that works for existing carters? Indeed, the quintessential nature of commercial waste zones is to reduce competition, is it not?
11. The DGEIS should disclose and analyze the costs to the City and to DSNY for managing the commercial zone plan. And what are DSNY’s liabilities for having to pick up commercial waste if there are failures under the plan, both in general and specifically during the transition period?

Transportation

1. The claim on p. 5-3 that the supposed increased diversion of recyclables and organics will reduce truck traffic needs to be justified. Why would it not result in increased truck numbers running parallel routes, as more trucks will be needed for each waste category.
2. If a small number of hauling companies win the bulk of the contracts, then it is likely that there will be significant numbers of trucks moving between zones. Such movements should be included in the analysis and VTM calculation. If they are banned from doing so, the analysis and calculation should include trucks that have to return to their base before embarking to the next zone (or whatever movement they would need to do to allow them to service the next zone).
3. Footnote 6 of Chapter 5 states that there will be 5.7 more truck routes due to increased collection of recyclables and organics. Why is this statistic in a footnote? How does it translate into number of truck trips? How was it derived? What would be the increase in VMT noted in the footnote?



**National
Waste & Recycling
AssociationSM**

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Northeast Region

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Abas Braimah
cwzcomments@dny.nyc.gov
New York City Department of Sanitation
Bureau of Legal Affairs
125 Worth Street, Room 708
New York, New York 10013

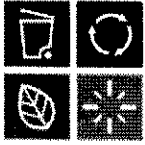
March 13, 2019

Re: Draft Generic Environmental Impact Statement ("DGEIS") for the
Proposed Commercial Waste Zone Collection Program

Dear Mr. Braimah:

The NYC Chapter of the National Waste and Recycling Association has been actively engaged in NYC's planning process to implement a commercial waste zone collection program. We continue to work with the City and all stakeholders to explore and better understand the plan's objectives -- and both its likely intended and un-intended consequences if implemented. We have done so since the implementation of any such plan will dramatically affect all of the commercial customers in the City that use our waste, composting and recycling services; as well as all of our employees and our taxpaying City based business entities.

As stakeholders in this process, and in behalf of our customers, employees and businesses, the NYC Chapter of the National Waste and Recycling Association is requesting the City provide more time for us and all others to review and evaluate the pending commercial waste zone plan DGEIS materials referenced above. This request for an extension is reasonable given the City has only provided the minimally required 30-day period to review, evaluate, and prepare detailed comments in response based upon the simultaneously released 186-page DGEIS and the 507-page Final Scope of Work study for the proposed commercial waste zone collection program. Granting an extension to file response comments until May 31, 2019 would fair and reasonable.



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Also the NYC Chapter of the National Waste and Recycling Association, requests the City use this extended comment time period to conduct additional public hearings on the commercial waste zone collection program, DGEIS and related documents at additional locations in all five boroughs, rather than solely at Department of Sanitation's offices at 125 Worth Street.

For the reasons stated above, and in the interest of developing a complete record informed by a sufficient opportunity for review of the DGEIS, the NYC Chapter of the National Waste and Recycling Association respectfully requests that the deadline for submission of DGEIS response comments, as noted above, be extended. Additionally we request the public hearings announced for the commercial waste zone collection program DGEIS and related actions for March 11 and 14, 2019, at 125 Worth Street be adjourned and that new public hearings on the DGEIS be announced and scheduled to take place at additional locations in all of the City's five boroughs.

Sincerely,

Steve Changaris

NYC NWRA Chapter Director



NEW YORK STATE RESTAURANT ASSOCIATION

Via Email: cwzcomments@dsny.nyc.gov

Abas Braimah
New York City Department of Sanitation
Bureau of Legal Affairs
125 Worth Street, Room 708
New York, New York 10013

March 11, 2019

Re: Requests for Extension of Time for Submission of Written Comments on Draft Generic Environmental Impact Statement (“DGEIS”) for the Proposed New York City Commercial Waste Zone Program, and to Schedule Additional Public Hearings on the DGEIS

Dear Mr. Braimah:

The New York State Restaurant Association (NYSRA) is extremely interested in New York City’s (the “City’s”) proposal to implement a commercial waste zone program and its prospective effect on the restaurant industry, and the environment. As such, NYSRA desires to comment upon the above-mentioned DGEIS to the New York City Department of Sanitation (“DSNY”). However, providing only an approximate 30-day period to review, evaluate, and prepare detailed comments based upon the simultaneously released 186-page DGEIS and the 507-page Final Scope of Work for the proposed establishment of commercial waste zones is unrealistic and unreasonable. In addition, because this proposal will affect **the over 26,000** restaurants that call this city home and other stakeholders throughout the City, public hearings on the DGEIS should be held at locations in all five boroughs, rather than only in Lower Manhattan.

For these reasons, and in the interest of developing a complete record informed by a sufficient opportunity for review of the DGEIS, NYSRA respectfully requests that the deadline for submission of comments on the DGEIS to the New York City Department of Sanitation be extended at least 60 days -- i.e., through Friday, May 31, 2019 -- to offer

March 11, 2019

Page 2

sufficient time for interested stakeholders to analyze the DGEIS and prepare comments that will help ensure a “hard look” at the environmental impacts of the Commercial Waste Zone Program.

NYSRA also requests that new public hearings on the DGEIS be scheduled to take place in each of the City’s five boroughs giving our members a chance to voice their opinion on this important proposal

With thanks,

Kevin Dugan
Director of Government Affairs
NYS Restaurant Association

GREATER NEW YORK HOSPITAL ASSOCIATION

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April
Eight
2019

New York City Department of Sanitation
Bureau of Legal Affairs
Attn: Abas Braimah
125 Worth Street, Room 708
New York, NY 10013

RE: DSNY Draft Generic Environmental Impact Statement: Commercial Waste Zones

Dear Mr. Braimah:

I am writing on behalf of the Greater New York Hospital Association (GNYHA) to provide comments on the Department of Sanitation's (DSNY) Draft Generic Environmental Impact Statement (DGEIS) related to its planned commercial waste zone (CWZ) program. As proposed, the CWZ program would divide New York City (City) into 20 commercial waste zones and limit the number of private waste disposal companies that can operate in each zone.

GNYHA represents the interests of over 160 hospitals and health systems in the New York region, all of which are publicly sponsored or charitable organizations. More than 50 of these hospitals and systems are located in the City and thus affected by the program. As a representative of health care providers, we share many of the goals of the CWZ program and of course support programs aimed at improving environmental quality, public health, and the health and safety of workers and the public.

We are very concerned, however, about the potentially significant adverse impact of the proposed program on our members from both cost and operational standpoints. As part of the DGEIS development process, GNYHA submitted comments requesting that DSNY include in its scope of work an evaluation of the program's impact on the City's health care facilities. We also requested that DSNY's DGEIS include alternatives that would avoid these potential adverse impacts, including exempting health care facilities from the program's anticipated limitations on the number of carters that may operate in a particular zone.

GNYHA respectfully states that DSNY did not undertake the requested, indeed required, evaluation of the program's impact on health care facilities, which represent a specific and vulnerable "industry" affected by the program. In addition, DSNY did not adequately consider alternatives that would avoid these negative impacts without undermining the CWZ program's goals in any material manner. This letter outlines the reasons why GNYHA believes DSNY did not fulfill these requirements, how the program will, in all likelihood, have a significant adverse impact on health care facilities, and why health care facilities should be exempt from the program.



GNYHA is a dynamic, constantly evolving center for health care advocacy and expertise, but our core mission—helping hospitals deliver the finest patient care in the most cost-effective way—never changes.

Health Care Facilities Represent a Separate, Unique, and Vulnerable “Industry”

Health care facilities are a special sector of the City’s economy that provide critically needed services for City residents as well as for those who work in, and visit the City each day. *Within the context of the City Environmental Quality Review (CEQR) process, health care facilities represent a “specific industry,” triggering the need for DSNY to evaluate the impact of its proposal on them.*

Health care facilities serve the City’s most vulnerable residents and communities and are extremely sensitive to cost increases and service changes. Many GNYHA hospital members are considered financially distressed or have been formally designated as “essential safety net” institutions by New York State, meaning they are critically important but financially vulnerable. This is certainly true of the City’s public hospitals as well as those voluntary hospitals caring for a large number of Medicaid and Medicare beneficiaries. To preserve vulnerable populations’ access to care, New York State has established programs and funding streams to address the needs of these financially fragile hospitals, but the funding falls far short of the need.

While other types of buildings or industries might be able to absorb or pass along price increases for services rendered, *health care facilities are simply not able to increase their prices or charges for most of the patients they serve.* In the vast majority of situations, health care facilities receive fixed payments from Medicare, Medicaid, and many insurers. When hospital costs increase, hospitals must simply absorb those costs and consider the potential curtailment of services.

With respect to sensitivity to service changes, hospitals generate more than a dozen types of waste, which creates an exquisite need to coordinate the handling and disposal of all of their waste streams in the most efficient, effective, and coordinated manner possible. *The potential for the CWZ program to disrupt current methods for the handling and disposal of these waste streams is a serious issue that requires serious study and consideration.*

DSNY Did Not Evaluate the Impact of Its Program on Health Care Facilities

Although the City’s health care facilities represent a specific, unique, and vulnerable “industry” or business, DSNY did not evaluate in any respect the significant adverse impacts that its program will have on these facilities. Instead, DSNY stated that medical waste is not included in its proposal, and for the purposes of its DGEIS analysis, simply treated health care facilities like any other type of building that generates “office waste.” This position does not reflect the special features, uniqueness, and vulnerability of health care facilities, which GNYHA outlined above and describes in more detail later in this letter.

GNYHA appreciates that the DGEIS undertakes a detailed analysis of how the proposal might affect the expenses incurred by the carting industry and how DSNY will require certain beneficial services from commercial carters. *However, the DGEIS does not project the impact of its program on businesses at large, let alone the hospital industry in particular.* Instead, the DGEIS asserts only that businesses would “likely benefit” from the program, given that the carting industry will not experience substantial increases in their expenses. However, that statement does not take into account the potential negative impact associated with reduced competition among carters and certainly does not consider the negative impact on health care facilities. GNYHA also appreciates that the DGEIS analysis projects that carting costs may increase in the

future under a “no action” situation. However, that conclusion does not suffice for meeting the requirement that the DGEIS analyze how the proposal might affect customers in the future.

Health Care Facilities Are Uniquely Vulnerable to the Proposal’s Adverse Impacts

As noted above, health care facilities are unique organizations, making them a “separate industry” for the purposes of DSNY’s analytical requirements as well as uniquely vulnerable to the adverse impacts of the CWZ proposal. The following outlines in more detail their unique or special features and how those features make them vulnerable to the adverse impacts created by the proposal.

Hospitals Generate Numerous Waste Streams, a Factor That Affects Price and Service: DSNY’s proposal assumes that the selection of carters in a particular zone will be limited, which may mean that hospitals can no longer contract with their current waste management company. Given the nature of their waste and the way they contract for disposal, it is expected that the program will have a detrimental effect on pricing and service for hospitals.

Unlike most other types of facilities, hospitals generate more than a dozen types of waste, ranging from the basic municipal solid waste that is the focus of the proposed CWZ program to regulated medical, pathological, infectious, and genotoxic waste. *Although these special types of waste are excluded from the CWZ proposal, the contracts entered by GNYHA members for the disposal of their municipal solid waste often provide that their waste disposal company will either dispose of, or arrange for the disposal of, many of the other waste streams generated by a hospital or system as well.*

As a result, hospital pricing for waste disposal services can differ depending on the number of waste streams for which a company is responsible, with some hospitals paying a blended or flat fee rate that covers the disposal of many waste streams by, or under the auspices of, their primary disposal company. Such consolidated contracts help reduce costs and improve the efficiencies of collecting and disposing of multiple waste streams, an important feature for hospitals, which typically have limited storage and loading dock space. *The CWZ proposal’s limitations on the number of disposal companies is likely to undermine the pricing and service efficiencies available to hospitals under existing arrangements in the event that their current primary contractor is not selected for their zone.*

Hospitals Are Currently Able to Negotiate Volume Discounts and Tailored Service Arrangements: Hospitals generally have very large facilities, and most hospitals in the City are members of larger health care systems. *Given the size of the facilities, the fact that they are part of health care systems, and the resulting amount of waste they generate, GNYHA members have typically been able to negotiate both lower rates and more tailored service arrangements for the disposal of their waste than many other types of generators.* Indeed, most products and services that GNYHA members purchase are subject to volume discounts available through either group purchasing programs or simply because of the size of a particular health system. With respect to waste disposal services in particular, hospitals undertake significant efforts to secure the best pricing possible. *They also need to negotiate carefully tailored disposal services, such as*

waste pickup on demand, given the volume of waste they generate and their limited storage space, as well as the coordination of waste disposal, given the many types of waste health care facilities generate.¹

Hospitals have been successful in negotiating favorable pricing and service terms with disposal companies because they are able to aggregate the procurement of their waste disposal services across the entire health system in which they operate. *This ability could be lost entirely or greatly diminished under the CWZ program, given its limitation of disposal options, particularly for health care systems with facilities located in multiple zones.* To illustrate, approximately 80% of GNYHA’s City member hospitals are part of health systems whose hospitals are located in more than one of the City’s proposed commercial waste zones.

- Depending on the system, a system might have hospitals located in anywhere from two to nine different commercial waste zones.
- Four systems would have hospitals in five or more different zones, and one system would have hospitals in nine different zones.
- When one takes into account the systems’ formal extension and other clinics, there are five health care systems whose facilities would be located in eight or more different zones.

Under the CWZ program, the facilities in these health systems would be required to contract with multiple waste companies, greatly diluting the pricing and service efficiencies they are able to achieve today.

Hospital Waste is Already Efficiently Transported to Transfer Facilities: GNYHA’s hospital members typically aggregate their municipal solid waste in large containers that are picked up by their waste disposal company upon demand, and only when the containers are full. *This means that their disposal companies transport these large containers directly from the hospitals to the transfer locations. GNYHA hospital members therefore do not contribute to the significant route inefficiencies cited as a rationale for the CWZ program.*

Reinforcing the Special Financial and Operational Issues Affecting Hospitals: *In outlining how health care facilities are a specific “industry” within the context of the CEQR requirements, GNYHA explained that health care facilities serve the City’s most vulnerable residents and communities and are extremely sensitive to cost increases and service changes, points that GNYHA believes should be reinforced here.* To recap, many hospitals are considered financially distressed and require financial support from the State and, in some cases, the City. They are unable to absorb or pass along price increases, given that most payers, such as Medicare, Medicaid, and many insurers pay only fixed prices for services. Quite simply, increases in the cost of operating a facility often means decreases in the services that can be offered. Finally, hospitals have unique waste disposal service demands, whether one focuses on their municipal solid waste disposal needs or their requirements pertaining to the other dozen streams of waste they produce. They require pickup on demand, carefully coordinated disposal of their waste streams, and of course the availability of high-quality and expert waste disposal options.

¹ GNYHA notes, for disclosure purposes, that a GNYHA affiliate (Acurity) offers several shared-service waste disposal agreements to its members, under which its affiliate earns administrative fees. Under those agreements, the waste companies may pick up municipal solid waste directly or through a subcontractor.

Summary of Concerns about the Negative Impact of the CWZ Proposal

Based on the foregoing unique characteristics of the City's health care facilities, DSNY's proposed CWZ program will create significant and adverse challenges for hospitals, both financially and operationally, as summarized below.

- GNYHA's member hospitals currently enjoy relatively low waste disposal costs given the volume of their waste and their ability to contract with a disposal company of their choosing with respect to one or more of the hospital's waste streams.
- The lower volume-based pricing enjoyed by GNYHA members is typically dependent on the same waste disposal company handling an entire health care system's municipal solid waste and often other specialized waste streams as well.
- *The possibility that a hospital or health system may be required to contract with multiple disposal companies, and not necessarily ones of its choosing, due to the multiple zones in which system hospitals are located, will, in all likelihood, lead to both higher disposal costs and operational inefficiencies.*
- There is also a general concern that DSNY's basic position of limiting the number of waste disposal companies operating in a particular zone will stifle competition overall, thereby potentially leading to higher prices even if a facility's current disposal company is selected through DSNY's request for proposal process in a particular zone.
- While we recognize that DSNY seeks to avoid the negative financial impact triggered by the Los Angeles waste zone program, *GNYHA's members are not in a position to absorb cost increases of any magnitude, let alone of the proportion reportedly experienced in Los Angeles.*
- These negative financial and operational impacts upon the hospital industry could potentially affect hospitals' ability to deliver needed health care services, and will not be counterbalanced by the types of reductions in vehicle miles traveled, related emissions, or other factors DSNY cites in support of the CWZ proposal, given how hospital waste is transported today. Instead, hospitals will bear the negative impacts of cost increases without a corresponding public benefit.

While the foregoing challenges represent significant adverse impacts within the context of the CEQR process, the DGEIS fails to account for any of the above factors. Instead, it lumps hospital facilities together with office uses for the purposes of its analysis and therefore does not meet the "hard look" standard required under SEQRA/CEQR.

Health Care Facilities Should be Exempt from the CWZ Proposal

In filing its comments on DSNY's Draft Scope of Work, GNYHA requested DSNY to consider alternatives that would avoid the above-outlined adverse impacts of the CWZ proposal on health care facilities. GNYHA specifically requested that the alternatives include exempting health care facilities from the program or, at the very least, allowing a single waste disposal company to serve a health care system with facilities located in multiple zones.

In response to GNYHA's request, DSNY stated that the exclusion of health care facilities could potentially result in route overlaps between carters serving a zone and those serving a health care system. However, given that hospital waste is already efficiently transported to transfer facilities in large containers, GNYHA underscores that its members do not contribute to the types of route inefficiencies DSNY cites in its

proposal, and certainly not to the meandering routes that carters that service a number of small customers might undertake. *Even assuming a potential for “fewer environmental benefits” if hospital routes might overlap with other carters, this would not outweigh the significant adverse impacts of the proposal on health care facilities and is not a basis for rejection of the alternative that GNYHA requested.* In addition, given DSNY’s goal of regulating commercial carters, the alternative could include a regulation requiring route efficiencies without subjecting carters serving health care systems to zone limitations. GNYHA would welcome the opportunity to discuss ways in which such efficiencies might be developed without the need to restrict carters serving health care facilities.

We thank you for the opportunity to provide input and would be pleased to answer any questions you may have.

Very truly yours,



Susan C. Waltman
Executive Vice President for Legal, Regulatory, and Professional Affairs



**STATEMENT OF THE NATURAL RESOURCES DEFENSE COUNCIL
ON THE NEW YORK CITY COMMERCIAL WASTE ZONE PROGRAM
DRAFT GENERIC ENVIRONMENTAL IMPACT STATEMENT**

March 11, 2019

My name is Eric A. Goldstein and I am New York City Environment Director at the Natural Resources Defense Council (“NRDC”). NRDC is a national, non-profit legal and scientific organization that has been active on a wide range of environmental health, natural resource protection and quality-of-life issues internationally, around the country and right here in New York City since our organization was founded in 1970. NRDC has more than 215,000 members and online activists in New York State alone. And our organization has been engaged regionally on solid waste issues for more than four decades, seeking to transform New York’s waste policy from primary reliance on landfilling and incineration to a system that has waste prevention, recycling, composting and equity as its cornerstones.

Under the current system for commercial waste collection in New York City, diesel-powered trucks from more than 90 different privately-owned carting companies race across city streets in an irrational routing scheme that generates unnecessary pollution, threatens public safety, and exploits the drivers and helpers who often receive low pay and poor benefits for their dangerous work. Some routes require as many as 1,000 stops in all five boroughs, with shifts lasting 12 hours or more. Some neighborhoods have more than two dozen separate carters driving to stores on the very same block every night. Making matters worse, the private carters haul their collected trash to land-based waste transfer stations, located disproportionately in overburdened communities of color, where the waste is combined, usually loaded onto larger diesel trucks and shipped to distant landfills and incinerators. As this summary illustrates, the current system for handling New York City’s commercial waste is completely broken.

On February 22, 2019, the New York City Department of Sanitation released a Draft Environmental Impact Statement (“DEIS”) for its Commercial Waste Zones plan. The city’s Commercial Waste Zone plan would implement a comprehensive reform of this system by dividing the city into 20 zones, with a limited number of carters per zone, and with carters who win zone contracts being obligated to meet contractual requirements to reduce vehicle miles traveled and associated air emissions; comply with industrial health and safety standards; achieve enhanced recycling and composting goals; and provide fairer, more transparent service to customers.

NRDC strongly supports the concept of commercial waste zones and many of the details proposed by the Department in its DEIS. We believe the DEIS satisfies the requirements of state and city law. And, for the reasons set forth below, we urge the Department to select the Exclusive Zone Alternative described in Chapter 9 of the DEIS.

NATURAL RESOURCES DEFENSE COUNCIL

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The DEIS outlines the multiple environmental and social benefits that would flow from implementation of a Commercial Waste Zones program. First, the DEIS concludes that implementation of Commercial Waste Zoning would reduce by at least 50 % the total vehicle-miles-traveled by commercial waste haulers. DEIS at 5-3. In its August 2016 Commercial Waste Zone Study, the Department estimated that commercial waste trucks travel over 23 million miles every year. Thus, a 50 percent reduction would slash diesel-waste truck travel by about 11.5 million miles every year -- a total distance of more than 23 times to the moon and back. In addition to greatly reducing threats to pedestrians and enhancing worker safety from the lower mileage and slower speeds, such dramatic decreases in waste truck traffic would bring big reductions in global warming discharges and ground-level air pollution. The DEIS estimates that greenhouse gas emissions would be cut between 39% and 66% in comparison to baseline conditions before implementation of the waste zone plan. DEIS at 7-7.

The waste zone proposal would also boost the percentage of commercial waste that would be collected for recycling and composting from the current estimated 24% (based upon a self-reported industry figure that we question) to 44 per cent. DEIS at 4-10, 4-11. And among other expected benefits for workers, the city projects that commercial waste zoning would create 165 additional jobs in recycling sorting and processing, which would exceed by four times the number of jobs lost through consolidation in the carting industry. DEIS at 3-49 and DSNY press release: "Moving Towards Commercial Waste Zones: NYC Sanitation Releases Draft Environmental Impact Statement," dated Feb. 22, 2019.

The Department's DEIS and its environmental review process have thus far fulfilled the requirements of state and city law. Most fundamentally, the Department's proposed waste zone plan and its environmental review process have been consistent with the State Legislature's intent, expressed in the State Environmental Quality Review Act, that "all agencies conduct their affairs with an awareness that they are stewards of the air, water, land and living resources, and that they have an obligation to protect the environment for the use and enjoyment of this and all future generations." ECL 8-0103(8). Moreover, both state and city environmental review statutes direct the lead agencies to undertake significant public involvement in their environmental review process. And here too the Department has launched its review process with great transparency and full public engagement. For example, in addition to the two public hearings that have been specifically scheduled to take comments on the DEIS, the Department held a series of waste zone-related stakeholder meetings over the past year at which more than 40 representatives of various affected constituencies were in attendance. Finally, the DEIS itself covers all of the major topics required to be incorporated into such a document, as set forth in regulations and the State Department of Environmental Conservation's SEQRA Handbook, including a description of the proposed action, the needs, benefits and adverse impacts of the proposed action, mitigation measures proposed, alternatives considered and social and economic impacts of the proposal.

NRDC has reviewed the DEIS in detail and recommends that the Final Environmental Impact adopt the Exclusive Zone Alternative that is discussed in Chapter 9 of the document. This chapter illustrates the additional public benefits that could accrue from implementation of an Exclusive Zone system. For example, exclusive zones would reduce Vehicle-Miles-Traveled by an additional 8 per cent, with consistent reductions in global warming emissions, ground level air pollution and enhanced pedestrian and worker safety. DEIS at 9-15. The DEIs also found that an exclusive zone system would result in further reductions in costs associated with commercial waste carting operations -- increasing efficiencies in payroll by an additional 2 per cent and efficiencies in routing by an additional 6 per cent. DEIS at 9-13. As for concerns that an exclusive zone system might result in increased costs for commercial businesses, there are mechanisms that the Department could employ, including price caps, to minimize any such impacts. In short, we believe it is a mistake to dismiss this alternative, which offers even greater benefits for city residents and would better help achieve the Administration's Climate and Vision Zero goals, while maximizing the efficiency of the new waste zoning system.

Finally, we urge the Department to go into greater detail in its FEIS regarding two important items. First, we recommend that the FEIS set forth more specifically how the new commercial waste zone system will address the socioeconomic issue of providing fair wages and improved benefits to workers employed by companies that secure waste zone contracts. In our view, an essential reform that must be incorporated into the final waste zone plan is provision to improve the pay scale and working conditions of commercial carter drivers and helpers. The FEIS should spell out the specific labor enhancements that will be encouraged and required under the new commercial waste zone scheme. Second, we recommend that the FEIS describe in greater detail how the Department plans to encourage the greater use of its newly renovated Marine Transfer Stations by those commercial carters who secure the new zone contracts. One mechanism for accomplishing this objective would be to give additional points -- in the selection process -- to those carters who indicate that they would be willing to deliver some or all of their collected waste to one or more of the city's four new MTS facilities.

We thank you for the opportunity to present NRDC's comments of the DEIS and look forward to working with the Department in the months ahead to help implement what we believe will be New York City's most significant waste policy reform in at least 30 years. If wisely implemented, the new commercial waste zone policy will bring widespread benefits to neighborhoods, residents and workers throughout all five boroughs.



Dedicated to restoring, revealing and revitalizing Newtown Creek

520 Kingsland Avenue, 3rd Fl, Brooklyn, NY 11222

April 5, 2019

The Newtown Creek Alliance (NCA) is a community-based organization that works to restore, reveal and revitalize Newtown Creek. We advocate for environmental remediation, industrial retention, and community health. We thank the New York City Department of Sanitation in advance for their careful consideration of our comments regarding the *NYC Commercial Waste Zone Program Draft Generic Environmental Impact Statement* (DGEIS).

The communities surrounding Newtown Creek host the bulk of the City's waste transfer stations; the 19 waste transfer stations located within 1/4 mile of Newtown Creek handle more than 40% of all waste moving through NYC-based transfer stations. By reducing waste related truck traffic and improving worker health and safety, NYC's Commercial Waste Zones (CWZ) plan has the potential to dramatically improve quality of life in Creek-side communities. Unfortunately, if the legislation and request for proposals (RFP) supporting NYC's CWZ plan are not carefully crafted, many of CWZ's potential benefits could be squandered.

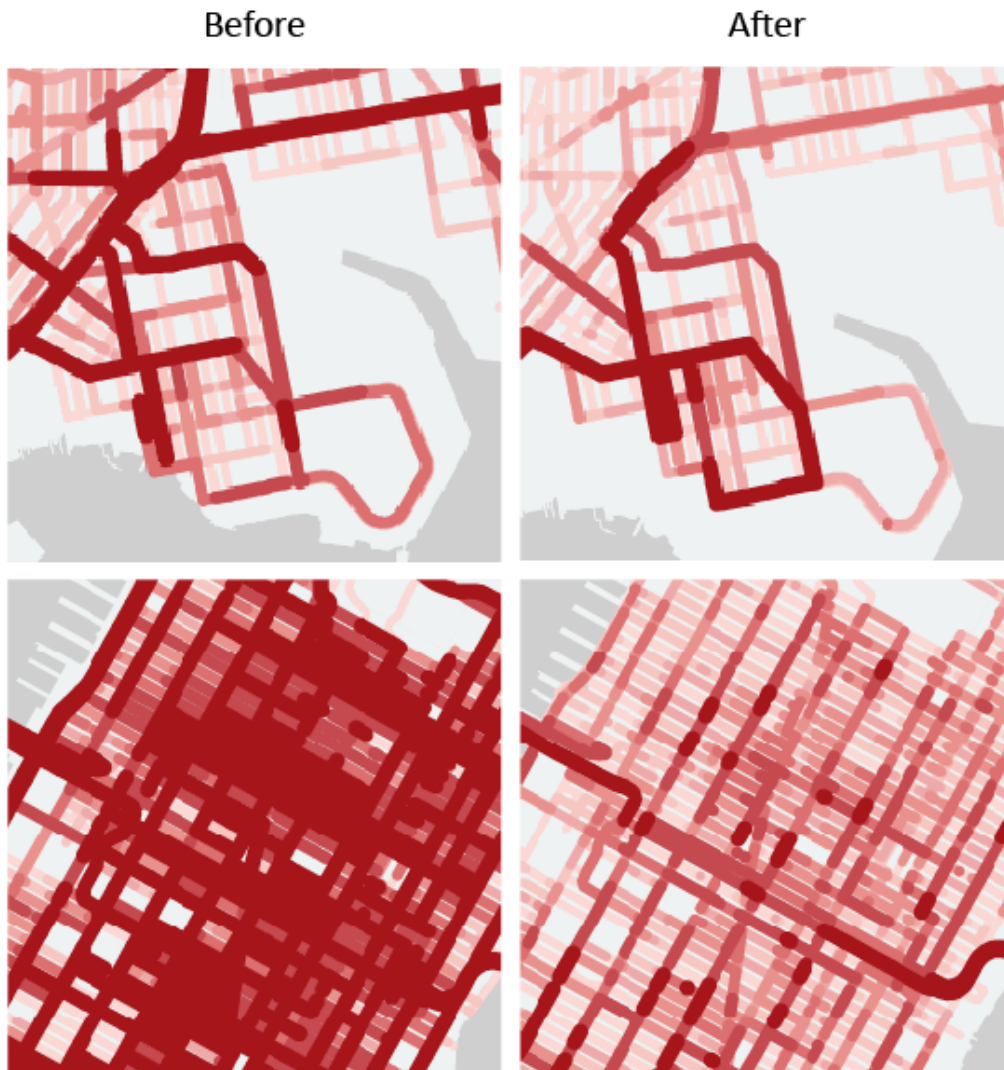
NCA is specifically concerned about the inequitable distribution of VMT reductions under the CWZ plan. Unless the CWZ legislation and RFP include specific mechanisms for ensuring that marine and rail based transfer stations are utilized to the maximum extent possible, we will have lost a tremendous opportunity to reduce the environmental impacts of NYC's solid waste disposal system for the communities suffering most acutely under the current system.

CWZ has an equity problem

Vehicle Miles Traveled (VMT) reductions under a CWZ system are inequitably distributed across the city, conforming to a geographic pattern that favors wealthier and whiter parts of the city at the expense of low-income communities and communities of color.

VMT reductions under a CWZ system are concentrated in areas of the city with dense commercial districts serviced by many separate carting companies, e.g. mid-town. VMT reductions under a CWZ system are muted in areas of the city that host carting garages and waste transfer stations (e.g. South Bronx, North Brooklyn). In addition, given that diversion rates for recyclables and organics are expected to climb under a CWZ system and recycling and organic waste collection trucks carry fewer tons than similar putrescible waste collection trucks (due to lower waste density), VMTs in some areas of the city will actually increase.

Hunts Point and Midtown Before and After CWZ



Source: New York City Commercial Waste Zone Program DGEIS, Figure 5-5, PDF page 125

Solutions to NYC's CWZ equity problem

1. RFP Weighting:

In evaluating hauler proposals, the City should include criteria that evaluates: a) distance between a zone and the haulers selected disposal facility or facilities; and b) whether the haulers selected facility or facilities export waste by barge or rail. Having a criteria within the RFP that heavily weights the tipping of trade waste at the nearest transfer station offering barge or rail transit the City can: a) increase hauler VMT reductions beyond the 50% estimate in the DGEIS; and b) reduce the disparity in VMT reductions between community districts. VMT reductions will result from both shorter hauler vehicle routes between zones and disposal facilities and the elimination of the tractor-trailer trips that would be required for transfer stations that export waste by truck.

According to the DGEIS, the proposed carting fee would constitute 40 percent of the selection criteria for each proposal. The heavy weight placed on this single criteria should be reevaluated in light of the importance of other important criteria that will a) ensure the public health benefits of a CWZ system are more equally shared between communities and b) improve worker safety and compensation and ensure the right to join a union that genuinely represents worker interests.

2. Tying Zones to Disposal Facilities:

The City should require haulers that are awarded zones that include an MTS and zones that are directly adjacent to a zone that includes an MTS to dump all waste collected in that zone at the nearest MTS.

3. Require Haulers & Facilities to Submit Joint Proposals:

One of the important goals of the CWZ plan is to incentivize capital investments in state-of-the-art disposal and recycling facilities by facilitating the establishment of long-term contracts between haulers and disposal, recycling, and organics facilities. The City should require that haulers and facilities submit joint proposals to ensure that facilities have a guaranteed stream of waste, recyclables, and/or organics. This will enable facilities to secure the capital required to make investments in their facilities, thereby reducing environmental impacts, improving worker safety, and increasing recycling rates.

Thanks again for your careful consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Heimbinder". The signature is stylized with a large initial "M" and "H".

Michael Heimbinder
Board Chair, Newtown Creek Alliance



New York City Department of Sanitation
Public Hearing on Draft Generic Environmental Impact Statement
for the New York City Commercial Waste Zone Program
March 11, 2019
Testimony of Eric McClure, Executive Director, StreetsPAC

StreetsPAC is a Political Action Committee that promotes safe-streets policies in New York City, and we are an endorser of Transform Don't Trash NYC. As advocates for safer streets, we strongly urge adoption of the Exclusive Zone Alternative for the city's Commercial Waste Zone Program.

As the analysis conducted for the Draft Generic Environmental Impact Statement makes clear, the Exclusive Zone Alternative will significantly reduce vehicle miles traveled as compared to the proposed action, reducing overall private-hauler VMT by 60% versus 50% for a non-exclusive zone program – a difference of nearly three million vehicle miles traveled annually.

Given the fact that drivers of commercial-waste vehicles have killed more than two-dozen people on city streets over the past five years, this is a significant, and potentially life-saving, difference.

The reduction in VMT will be even more pronounced in the densest parts of the city. An exclusive-zone plan would reduce VMT in the Midtown Manhattan central business district by 52% versus the proposed non-exclusive program.

The additional reduction in vehicle miles traveled from the Exclusive Zone Alternative will provide other important benefits besides improved safety. Reduced VMT will mean better air quality and lower greenhouse gas emissions, and the more streamlined routing of trucks will lead to reduced noise levels, as well. Importantly, worker safety will also be optimized under an exclusive-zone system.

Finally, exclusive zones will require fewer trucks and less fuel, leading to significant cost savings for the commercial haulers awarded exclusive-zone contracts. Some of these savings can be passed along to customers, offsetting concerns about increased costs due to reduced competition – which the city can also manage through better regulation.

The long-term stability created by an exclusive-zone system will best enable private haulers to amortize investments in newer, cleaner, and safer trucks and technology, thanks to the stable customer base, predictable revenue stream, and long-term, enforceable contract with New York City that such a plan would create.

We urge adoption of an exclusive-zone plan for New York City's commercial waste.

Waste Connections of New York, Inc.
Draft Generic Environmental Impact Comment Letter

April 1, 2019

The following constitutes Waste Connections of New York, Inc.'s comments on the Draft Generic Environmental Impact Statement ("DGEIS") for the Commercial Waste Zone Implementation Plan in response to the Notice of Positive Declaration/Notice of Determination and Notice of Intent to Prepare a Draft Generic Environmental Impact Statement and Notice of Scoping Meeting dated November 5, 2018.

While we appreciate that the City's DGEIS analyzed exclusive waste zones as part of its assessment, we believe that its conclusion was incorrect for the following reasons: The DGEIS in the Socioeconomics section of Chapter Nine, Section C, explicitly states that "as with the CWZ Program, the Exclusive Zone Alternative would not result in significant adverse impacts on the viability of the commercial carting industry, or businesses that rely on the commercial carting industry" (emphasis added). It also correctly points out that carting companies' operational costs would decrease due to increased efficiencies.

The DGEIS, however, then inconsistently states that commercial service costs may increase and that the transition to such a system would be worse than a multi-zone system. Both of these assumptions are wrong.

The DGEIS expresses the fear that a "monopoly" would lead to increased cost. A franchise license, however, is not a traditional monopoly where an entity has the ability to set its own pricing. Any Exclusive Zone pricing, however, will be set first by extreme competition between the proposers and then after further negotiation with the City's lawyers. Annually or periodically the city would adjust prices with input from the providers, customers and the community. Any uptick in price would then be justified by the City similar to rate increases with more traditional utilities. This transparency will ease any concerns about unfair pricing.

Moreover, any Exclusive Zone RFP that New York City issues will receive national interest and likely garner new entrants into the marketplace as it allows for a company to earn a return on its invested capital over the life of the contract. A Non-Exclusive system does not offer the same probability of successful capital recovery and thus is less likely to generate market entrants. Because of the large number of proposers an Exclusive System would attract, proposed pricing for service would be highly competitive.

As for the transition between systems, both an Exclusive and Non-Exclusive system will require extensive logistical issues. An Exclusive Zone transition should be easier to implement than a Non-Exclusive zone system. There is a long history of transitions from open market to Exclusive Zones. There is no history, however, from an open market into a Non-Exclusive

system. Questions remain over how a new carter would gain market share in a new commercial zone and what the result would be if a critical mass of customers was not reached.

The DGEIS also mistakenly makes the assertion that an Exclusive Carter will have no incentive to provide quality service. On the contrary, it is anticipated that the City will establish a protocol to provide customer protections under either system. In an Exclusive System, protocols can be easily established under which a carter who fails to provide proper service would be fined or otherwise penalized.

From a safety perspective, the DGEIS notes that an Exclusive System would improve Vehicle Miles Traveled by eight percent over a Non-Exclusive System and nine percent in the number of trucks (65) operating every day. Simply put, less miles and less vehicles equates to less risk, or opportunities for accidents. It is, by the numbers, the safest proposed system.

Other benefits not recognized by the DGEIS include the ability of a provider to integrate with other City services. For example, an Exclusive provider with a long term contract will enable the City to more efficiently coordinate the City DOT's Off-Hour Deliveries Pilot Program.

Recycling and other innovative programs can be tried in an Exclusive model. For instance, drop off locations for glass or centralized waste and recycling collection locations can be established to cut down on truck traffic in certain neighborhoods. Each day a different material for the entire zone can be set out creating even greater efficiencies. These innovations will in turn improve neighborhood quality-of-life as well as the environment. They are, however, best explored and tried in an Exclusive System.

Some of the Waste Zone opponents prefer the present system because they claim their unique specific needs and time pickup requirements require more than one hauler. Their concerns, however, are misplaced. Presumably a smaller hauler cannot meet a service window because it is not in that area at that time but is instead traversing different areas of the City. Under an Exclusive Zone system, the hauler is dedicated to the Zone and thus is always available to meet the zone's customers' specific needs. Moreover, the City could, in an Exclusive System, require a building of a certain size to have a dedicated truck for its needs.

Another argument Waste Zone opponents make for not changing the current system is that certain large buildings utilize compactors that are disposed of directly at transfer stations. But regardless of the system chosen, whether it be Exclusive, Non-Exclusive or no change at all, compactors will continue to be moved in the same manner.

The City's main rationales for its transition to a commercial waste zone system is the reduction of vehicle miles traveled, improved air quality and the safety of both the general public and industry workers. As the City's own environmental review demonstrates, and as we

advocate for above, an Exclusive Zone System provides the best way to simultaneously achieve these notable goals.

Thank you for your consideration of these comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Andrew Moss". The signature is fluid and cursive, with the first name "Andrew" being more prominent than the last name "Moss".

Andrew Moss
Government Affairs Manager

TESTIMONY OF THE MANHATTAN SOLID WASTE ADVISORY BOARD

*City of New York
Department of Sanitation
Bureau of Legal Affairs*

*NYC Commercial Waste Zone Program
Environmental Impact Statement*

March 14, 2019



The Manhattan Solid Waste Advisory Board (MSWAB) is a strong supporter of the City's goal of zero waste by 2030. For this reason, it has also been a proponent of a franchise system for commercial waste haulers since the concept was introduced in 2014. MSWAB offers the following points in connection with the release of the Draft Environmental Impact Statement (EIS) for the City's proposed commercial waste zone system that focus primarily on the potential for increased diversion rates.

The Draft EIS reveals the importance of commercial waste zones to the City's goals of achieving zero waste. Importantly, under a commercial waste zone system, carters will be required to collect all three waste streams—mixed refuse, recyclables, and source separated organics—to increase recycling and organics diversion. **MSWAB supports the idea that a winning hauler may subcontract one stream or more to a micro-hauler or smaller specialized company, as long as that subcontractor is also subject to the terms of the prime contract.**

Under the proposed plan, **waste diversion is projected to reach 44% by 2024**, which would be a substantial improvement as compared to a rate of **33% by 2024 if no action is taken**, as well as the current diversion rate of 25%. Reflected in the 44% figure are projections that the proposed commercial waste zone system will: **(1) increase the collection of recyclables from 30% by 2024 if no action is taken, to 38% under the plan; and (2) increase organics collection from 3% by 2024 if no action is taken, to 6% under the plan. In other words, by 2024, the plan is expected to increase the rate of recyclables collection by nearly a third, and double the rate of organics collection. These are significant improvements.**

In addition, the Draft EIS indicates that while the CWZ system has the potential to increase diversion and recycling, **it will not necessitate additional processing facilities for waste.** Projections indicate that existing recycling and organic processing facilities within the New York City metropolitan area will be sufficient. Finally, with respect to reducing truck traffic, the proposed commercial waste zone would reduce the number of trucks per day from 174 to 104 in Midtown Manhattan.

For these reasons, MSWAB continues to support the city's proposed commercial waste zone plan and encourages the City to continue to move forward with its implementation.

###

The Manhattan Solid Waste Advisory Board

Chair: Jacquelyn Ottman; Vice-Chair: Rona Banai; Co-secretaries: Katie Hanner, Christine Johnson; Diane Orr; Treasurer;

Members: Margot Becker, Matthew Civello, Maggie Clarke, Debby Lee Cohen, Peter Cohen, Naomi Cooper, Phillip Corradini, Sarah Currie-Halpern, Meredith Danberg-Ficarelli, Cullen Howe, Sofia Huda, Melissa Iachan, Nathaniel Johnson, Kate Mikuliak, Kathy Nizzari, Tina Pinia, Martin Robertson, Laura Rosenshine, Jennie Romer, Rick Schulman, Brendan Sexton, Marc Shifflett.

The Manhattan Solid Waste Advisory Board (MSWAB) is a volunteer citizens' advisory board dedicated to helping NYC achieve its zero waste goals. We advise the Manhattan Borough President, City Council, City Administration and others on policies and programs regarding the development, promotion and operation of the City's waste prevention, reuse and recycling programs. We are a Board comprised of solid waste management industry, waste reduction and diversion consultants, sustainability professionals, and concerned citizens, appointed by the Manhattan Borough President's Office. We produce two grant programs: the NYC Community Composting Grant and the NYC Reuse and Repair Grant, hold monthly meetings, provide information online about waste reduction and diversion in NYC, and have a number of active committees, all of which are open to the public.

<https://www1.nyc.gov/assets/dsny/site/resources/reports/commercial-waste-zones-plan>

###

TESTIMONY OF THE MANHATTAN SOLID WASTE ADVISORY BOARD

*City of New York
Department of Sanitation
Bureau of Legal Affairs*

*NYC Commercial Waste Zone Program
Environmental Impact Statement*

March 14, 2019



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<http://www.manhattanswab.org>

###



New York City Environmental Justice Alliance

166A 22nd Street, Brooklyn, NY 11232 | www.NYC-EJA.org

On the ground – and at the table

Testimony for the Commercial Waste Zone Draft EIS Hearing, NYC Environmental Justice Alliance

March 14, 2019

My name is ‘Tok’ Michelle Oyewole, Ph.D., and I am testifying on behalf of the New York City Environmental Justice Alliance (NYC-EJA). Founded in 1991, NYC-EJA is a non-profit citywide membership network linking grassroots organizations from low-income neighborhoods and communities of color in their fight for environmental justice.

For decades, NYC-EJA has led efforts for comprehensive policy reforms to address the disproportionate burden of New York’s solid waste system on a handful of environmental justice communities. To handle nearly 35,000 tons of garbage generated each day in NYC, waste trucks needlessly travel thousands of miles per night through multiple boroughs of New York City, polluting our air with diesel fuel, clogging our streets, and diminishing our quality of life. The impacts are greatest in those few low-income and communities of color where truck-dependent transfer stations are clustered, causing higher proportions of health consequences such as asthma, heart disease, and cancer.

We have reviewed the draft EIS of the commercial waste zone plan in depth and we are overall pleased it confirms what we have been saying all along: the current commercial waste collection system is inefficient, and an exclusive zoning system would result in the greatest possible reductions in air pollution, GHG emission, road damage, and noise, by taking miles of truck traffic and excessive vehicle pollution off of NYC city streets. We are also particularly pleased that the Request for Proposals (RFP) process could incentivize cleaner waste truck fleets by mandating compliance with existing laws such as 2007 EPA standards for vehicles, could incentivize better labor standards for workers, safety standards for pedestrians and cyclists, and transparency and price standards for customers. While our passage of the Waste Equity bill last year was instrumental in ensuring some reductions in permitted waste capacity in overburdened neighborhoods in North Brooklyn, the South Bronx, and Southeast Queens, we have some recommendations for the commercial waste zone proposal in light of the EIS findings that would improve its achievement of stated goals within EJ communities and the city as a whole:

- 1) **Vehicle miles traveled.** Although the exclusive zone proposal outlined in chapter 9 of the DGEIS is likely to result in decreased vehicle miles traveled throughout the city, due to clustering of waste transfer stations and truck depots or garages, certain neighborhoods which have already had historically higher burdens will see much lower reduction than others. We recommend the bill address the following:
 - a) **Geographic proximity.** The Commercial Waste Zone bill should ensure reduction in vehicle miles for overburdened communities by incentivizing waste transport to transfer stations geographically closest to the zones. This needs to include the Marine Transfer Stations which, while costlier to tip in, are equitably distributed throughout the city, well-run, and have the capacity to displace *even more* vehicle miles from the round-trip export of waste, or vehicle miles from 48 long haul diesel trucks per barge. We encourage inclusion of geographic proximity to transfer stations and marine transfer stations within the bill and RFP process; and we must keep in mind that Manhattan does not host any land-based transfer stations, only MTSs which are underutilized, meaning their waste is exported to outer boroughs and communities under the current system. We also propose that the bill subsidize haulers to tip into the well-run, more efficient MTSs.

- b) **Consortiums and subcontracts.** We are concerned with the proposal that operators awarded a zone will be able to form consortiums and subcontracts with other types of haulers, without any specified limits. If subcontracts are allowed and encouraged within each zone, they should be limited in number, specified in detail within the RFP beforehand, and should prioritize subcontractors using at least the same standards for the main carters, lest the functioning of the CWZ bill negate its stated goals and increase vehicle miles. We encourage the RFPs reward women and people of color in this primarily male industry by hiring MWBEs, in primary and subcontracts.
 - c) **Long-term contracts with facilities.** Incentivizing submission of RFPs with proposed contracts between haulers and the most proximate waste transfer station, would provide the added benefit of ensuring the amount of waste that flows to transfer stations, and allow them the ability to plan ahead and make infrastructural improvements.
 - d) **Study overburdened districts.** While we are pleased about and agree with the overall projection of VMT reduction based on three representative case study zones, we recommend that subsequent study specifically quantify the vehicle mile reduction in the three neighborhoods receiving 75% of the city's waste, to ensure they receive a fair share of reductions of vehicle miles traveled.
 - e) **Truck depots.** Future study regarding vehicle mile reductions should analyze and aim to reduce the effects of clustering of waste truck depots on vehicle miles traveled in neighborhoods, considering the added miles from origin and return to neighborhoods with truck depots.
 - f) **Monitoring.** We encourage truck counts and mileage trackers for haulers and subcontractors to ensure that VMTs are actually reduced in communities, where on some corners, such as in the South Bronx at a particularly bad corner, 304 trucks go by per hour, 45% of which are waste trucks.
- 2) **Regulate disposal facilities and improve landfill diversion:** Again we want to reiterate that the bill should not leave out the facilities where waste ends up for processing and export. Likewise, we want local benefits of increased diversion from landfill to include less processing of waste in our communities, which must be informed by fair share principles to avoid the clustering of composting or recycling once again in EJ communities. Further, the bill should:
- a) **Protect EJ communities & workers.** Because of the disproportionate siting of waste facilities in low-income communities of color, the new zoned system should ensure that poorly-sited facilities with a history of violations are not permitted to handle our city's waste. The City should also ensure that transfer, recycling, and compost facilities are required to meet the same basic labor standards as the carters.
 - b) **Prioritize aggressive facility oversight.** The same oversight over carters that this system promises should apply to facilities; communities of color should not have to deal with the noise, smell, pollution, and other disruptions caused by poorly-operating waste facilities.
 - c) **Incentivize diversion.** The EIS proposes to not invest more into construction of facilities, meaning that micro-haulers carting organic waste, who sometimes do so with bikes that do not add greenhouse gases or air pollutant emissions, do not have a guaranteed place to scale up this sustainable work. The bill has the opportunity to prioritize existing or new infrastructure for this work. Relatedly, the RFP process has the opportunity to increase the modest organics and recycling diversion goals stated within the EIS, to be more on par with West Coast cities that have implemented zoning, and more aligned with OneNYC goals of reaching *Zero Waste by 2030*.
 - d) **Increase education and regulation regarding separation along the waste chain.** This includes the customers, carters, facilities, and producers.

Lastly, we suggest that the weight allocated in the proposal of 40% for a carting fee is perhaps too high a proportion, and that reasonable and standardized rates for customers based on the amount of waste they contribute be mandated rather than weighted this way in the RFP; in so doing, weight could be allocated to all of the critical elements mentioned above.



Phillips Lytle LLP

Via Email and Regular U.S. Mail

Abas Braimah
New York City Department of Sanitation
Bureau of Legal Affairs
125 Worth Street, Room 708
New York, New York 10013

March 11, 2019

Re: Requests for Extension of Time for Submission of Written Comments on Draft Generic Environmental Impact Statement ("DGEIS") for the Proposed New York City Commercial Waste Zone Program, and to Schedule Additional Public Hearings on the DGEIS

Dear Mr. Braimah:

We are counsel to New Yorkers for Responsible Waste Management, Inc. ("NYRWM"), which is comprised of more than a dozen member companies, many of them multi-generational and family-owned, that offer waste hauling services to commercial customers throughout the five boroughs of New York City.

Keenly interested in the New York City Department of Sanitation ("DSNY") proposal to implement a commercial waste zone program and its prospective effect on commercial waste haulers' businesses, their customers, and the environment, NYRWM and its members desire to comment upon the above-mentioned DGEIS to DSNY. However, providing only an approximate 30-day period to review, evaluate, and prepare detailed comments based upon the 186-page DGEIS and the 507-page Final Scope of Work for the proposed establishment of commercial waste zones is inadequate and unreasonable.

The NYSDEC SEQR Handbook provides that the minimum review period is 30 days but the lead agency should extend the review period if there is substantial public interest or there are other reasons more time would be appropriate. "In practice, the time allowed for draft EIS review is often considerably longer than the minimum." NYSDEC SEQR Handbook, p. 140. The simultaneous release of the final scope and

Adam S. Walters
AWALTERS@PHILLIPSLYTLLE.COM

ATTORNEYS AT LAW

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Abas Braimah
Page 2

March 11, 2019

DGEIS has made it impossible to analyze and prepare sufficient comments. Moreover, DSNY provided almost a 60-day comment period on the approximate 30-page Draft Scope. In addition, because this proposal will affect commercial waste hauling in every corner of the City, public hearings on the DGEIS should be held at locations in all five boroughs, rather than only in Lower Manhattan.

For these reasons, and in the interest of developing a complete record informed by a sufficient opportunity for review of the DGEIS, NYRWM respectfully requests that the deadline for submission of comments on the DGEIS to DSNY be extended at least 60 days -- i.e., through Friday, May 31, 2019 -- to offer sufficient time for interested stakeholders to analyze the DGEIS and prepare comments that will help ensure a "hard look" at the environmental impacts of the Commercial Waste Zone Program. NYRWM also requests adjournment of the public hearings scheduled for March 11 and 14, 2019, at 125 Worth Street in Manhattan; and that new public hearings on the DGEIS be scheduled to take place in each of the City's five boroughs.

Very truly yours,

Phillips Lytle LLP

By

Adam S. Walters

ASWkmf3
Doc #01-3580968.2

cc: Kendall Christiansen
David E. Bronston, Esq.



Phillips Lytle LLP

Via Email and Regular U.S. Mail

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Very truly yours,

Phillips Lytle LLP

By

Adam S. Walters

ASWkmf3
Doc #01-3580968.2

cc: Kendall Christiansen
David E. Bronston, Esq.



Phillips Lytle LLP

Via Email and Regular U.S. Mail

Abas Braimah
New York City Department of Sanitation
Bureau of Legal Affairs
125 Worth Street, Room 708
New York, New York 10013

April 8, 2019

Re: Written Comments on Draft Generic Environmental Impact Statement ("DGEIS")
for the Proposed New York City Commercial Waste Zone Program

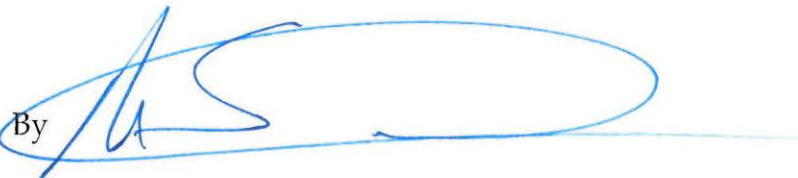
Dear Mr. Braimah:

We are counsel to New Yorkers for Responsible Waste Management, Inc. ("NYRWM"), which is comprised of more than a dozen member companies, many of them multi-generational and family-owned, that offer waste hauling services to commercial customers throughout the five boroughs of New York City. DSNY extended the public comment period on DGEIS until April 8, 2019 at 5:00 pm. Accordingly, NYRWM's comments on the DGEIS are attached hereto.

Thank you.

Very truly yours,

Phillips Lytle LLP

By 

Adam S. Walters

ASW/pjs

cc: Kendall Christiansen

David E. Bronston, Esq.

Doc #01-3580968.3

Adam S. Walters
AWALTERS@PHILLIPSLYTTLE.COM

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*Comments on the
NYC Department of Sanitation
Draft Generic Environmental Impact
Statement for the Commercial Waste
Zone Program*



Kendall Christiansen
Executive Director
kendall@gaiastrategies.com
917.359.0725

April 8, 2019

TO: Abas Braimah, Bureau of Legal Affairs
New York City Department of Sanitation
125 Worth Street – Room 708

Via email only to:

cwzcomments@dny.nyc.gov

FROM: Kendall Christiansen, Executive Director
New Yorkers for Responsible Waste Management

Thank you for the opportunity to submit these comments on behalf of New Yorkers for Responsible Waste Management regarding the Draft Generic Environmental Impact Statement (DGEIS) supporting the Department of Sanitation’s Commercial Waste Zones Plan (CWZP).

The comments are presented in multiple sections – an introductory/overview section, specific comments related to the major areas of the DGEIS, and a concluding section.

Introduction/Overview

“All puppies and unicorns” is the best way to describe the DGEIS – it neatly presumes that everything associated with the CWZP will be positive and without consequence (costs will go down and recycling goes up!), without adequate documentation to allow for meaningful public comment and uses its presumptive conclusions to avoid the need to provide any substantive or meaningful data, critique, analysis or consideration of potential impacts that challenge the DSNY “puppies and unicorns” narrative. The entire DGEIS – taken as a whole and in its separate components – is built on a house of cards of assumptions and projections which offer an array

of “false promises” intended to lull unknowing readers into support for its premises and conclusions, which belies the real-world experience of cities like Los Angeles that are now struggling with the aftermath of implementing a system similar to what DSNY is proposing, as well as cities such as San Jose and San Francisco where service costs significantly exceed those of open-market cities.

The examples of that approach, which violates and undermines the basic purpose of preparing an EIS, are replete throughout the DGEIS – in its unsupported conclusions about VMT-related benefits (which have varied and inexplicably decreased substantially over time but still remain higher than industry standards); the impact on costs and services to customers; the cursory presumptions about “No Action” scenarios; the unsupported claims about increased diversion; the fate of existing waste service companies; and many more. It fails, for example, to assess the efficacy of the comprehensive array of existing rules and regulations that govern NYC’s waste services providers (as well as protect and guide customers/generators), as well as enforcement data (e.g., violations issued) as both an indicator of compliance and for lessons learned. It simply and complacently states repeatedly that DSNY and BIC lack adequate tools and resources at present – again, without explanation - which somehow results in lawless behavior by both customers and waste service providers that a new reporting and enforcement system will somehow magically rectify.

The introduction to Chapter 1 of the DGEIS states that the Final Scope consisted of revisions to the Draft Scope and DSNY’s responses to public comments received on this document. However, DSNY’s changes to the Draft Scope were minimal. In addition, DSNY simply ignored many scoping comments including most of NYRWM’s comments on the draft scope. Further, to the extent comments were responded to (the vast majority were not), answers were extremely superficial (i.e., such issue will be addressed in the DGEIS). This superficiality carried through into the DGEIS. Accordingly, all of NYRWM’s scoping comments are attached hereto and resubmitted as comments on the DGEIS.

Given the environmental and efficiency arguments at the core of the CWZP, the DGEIS also fails to consider, analyze and integrate into the analysis, the known and projected impacts of industry compliance with Local Law 145 (of 2013) that requires clean-emission trucks by the end of 2019 (it is mentioned in the No Action Alternative but somehow, the DGEIS fails to provide any analysis of this under the GHG Chapter). In addition to effectively addressing the city’s cleaner air goals, the requirement is expected to further significantly reduce the number of BIC-licensed service providers because of the prohibitive cost to the smallest companies. The over-stated presumption of ninety (90) companies providing commercial waste services - already likely to be 20% less - could be reduced to thirty-five (35) or fewer companies within

the next nine months (by the end of 2019). The presumably desirable efficiency effects of that industry consolidation should trigger a comprehensive update to the underlying analyses, especially regarding VMTs.

It should be noted that DSNY does not itself have a visible and measurable commitment to analyzing and reducing VMTs from its own operations; in fact, it has been adding truck routes and miles for the collection of organics, as well as electronic waste.

The DGEIS also is silent about many key elements of the proposed Plan – notably lacking an analysis of waste generation/composition (the outdated California waste generation model offered as a proxy is unjustified and unacceptable. Frankly, it is only presented due to the City’s failure to muster its own resources to conduct a meaningful analysis of commercial and industrial waste generation necessary to evaluate the actual impacts of the Program), changes in collection equipment affecting both safety and emissions, and best practices with respect to labor.

Regarding labor-related practices, anecdotes about severe working conditions can be compelling, but constitute neither data nor analysis. If the Plan contemplates significant changes to industry work-rules and practices – presumably in the direction of fewer hours with increased wages and benefits - the cost impact of those changes must be explained (with adequate documentation to inform the public where the numbers came from) and analyzed.

The DGEIS also fails to clearly delineate, critique and assess current regulatory practices that already address the Plan’s goals, such as a “customer bill of rights,” the right to a written contract for services, and the operation of customer call centers (no evidence of an existing problem). Recently updated laws and regulations already are in play; the existing requirements for recycling-related services and expanding organics-related service will be fully phased-in by the time a zone system is fully implemented. Yet the DGEIS ignores these issues which undermine the alleged benefits of the CWZP.

No mention can be found in the DGEIS of the impacts of the CWZP proposal for artificially subsidized services – that is, the proposal that collection of recyclables and organics must be priced less than non-recyclable waste, even if a true-cost analysis found otherwise. This is just one example of a matter that was supposedly vetted by the Commercial Waste Zone Advisory Board that found its way into the Plan, even though it was not supported by a consensus of the Board. The mechanics and impacts of its implementation cannot wait for the RFP to proscribe but must be identified and assessed in the DGEIS.

In fact, the DGEIS rhetoric about supporting the city's zero waste goals is especially ironic, as DSNY itself does not have such a plan. The assertions about increased diversion of recyclables and organics attributable to a zone-franchise system are unsupported by data and analysis, including the recognition that NYC's commercial recycling and organics laws, regulations and systems are substantially more comprehensive and well-established than in most cities – and recognize the primary role of businesses that generate such wastes in ensuring their proper management under law and regulations. The CWZP does not appear to change that essential element of the commercial waste management system yet asserts that recycling and source separation of organics will increase by 19% over existing conditions. (Inexplicably, the basis for this assumption is not even in the DGEIS impact analysis solid waste management section but rather is explained in the socio-economic section of the report).

In addition, the DGEIS does not contemplate the potential impacts of the CWZP attracting interest from national waste service companies that operate vertically-integrated system – including owning and operating disposal capacity that, as stated in NYRWM's scoping comments, can create a perverse incentive for its use instead of investing in waste diversion systems.

And the DGEIS largely avoids any serious discussion of the CWZP's relationship to the city's goals with respect to reducing greenhouse gas emissions (GHG). A fair analysis of GHG emission in the waste management sector would find that the collection component is of little consequence; the majority of GHG emissions are the function of how waste materials are processed and disposed of. The use of GHG emissions as a policy driver for the collection-related aspects of the CWZP is therefore inappropriate at best and misleading at worst.

As the Plan proposes an unprecedented and untested system of zones with strict boundaries with multiple service providers competing for customers, the DGEIS remarkably fails to identify, critique and assess even one example of an analogous system in use in any other major city. It largely ignores the numerous intended and unintended consequences of such a Plan's implementation – both during the transition period, and after the transition period has concluded.

The DGEIS, for example, must seriously consider the potential impacts if one of the designated providers dominates a zone – either immediately or over time – making it difficult to impossible for other providers to operate viably. What happens if the total number of service providers awarded zones declines to less than ten companies, or as few as five under the proposed Plan? How will the City's presumed goals be achieved – especially its interest in maintaining and robust and competitive system? How will it manage the very real effects of loss of competition, which it regards as an insignificant risk but data demonstrates otherwise? For instance, a

cursory review of data associated with the three case study areas clearly demonstrates that more competition results in lower customer costs (compare Manhattan CBD with Flatbush), What experience and capability does DSNY have to be effective in the role as manager of a complex system for which it lacks historical knowledge and current experience – and how large (and costly) a bureaucratic operation will be required to manage the proposed new system?

With respect to the impact of the CWZP on customers, the DGEIS provides a limited and myopic view – through three neighborhood case studies – of how customers might be affected if a zone-based system is adopted. However, the case study areas are much smaller than actual proposed zones and the ability to obtain meaningful information from these three case studies is not sufficiently explained. The approach also ignores the impacts on customers that operate multiple locations throughout the city and across zones – commercial office buildings, utilities, health care institutions, etc. even though the operational and cost impacts could be considerable. More important, the underlying socio-economic challenges facing the city’s small and medium-size businesses – rising rents, higher labor costs, competition for on-line delivery services, etc., and the vacant storefronts that visibly populate neighborhood shopping strips must be acknowledged, understood, and analyzed given the likelihood that waste collection costs will increase if the CWZP is implemented - adding more cost pressure on their economic viability.

As a procedural matter, the DGEIS commentary preempts a discussion as to whether the CWZP triggers the need for a formal update to the City’s Comprehensive Solid Waste Management Plan, adopted in 2006 without any reference to the scheme proposed, nor any significant discussion of the commercial waste collection system and the need for the system to be restructured. At the very least, the New York State Department of Environmental Conservation (NYS DEC) should be identified as an involved agency and formally asked to review and comment on the DGEIS in that role.

The unilateral rejection of Scope-related comments urging consideration of the entire system including waste transfer, processing, transport and dismissal attempts to provide a “hard boundary” for the Plan and the DGEIS, but also violates the “improper segmentation” requirements of SEQRA. As there is obvious interplay between collection, delivery and disposal (the cost of the latter is 40% of total system costs) – with some local companies engaged in both - the recent adoption of LL152 and its presumed implementation in 2020 cannot be ignored, and must be fully included in the analysis – especially since the process leading to its adoption stopped well short of a comprehensive EIS and public dialogue about the impacts of LL152.

The factual basis for the DGEIS assertion about minimal job loss in collection service companies is unsupported by data or analysis, or real-world discussions with companies. This “boundary” condition challenges one of the DGEIS assertions – that any job loss from the demise of smaller waste collection companies would be offset by presumed job gains in materials processing – is misguided on two fronts. First, claiming credit for such job creation violates the boundary condition of what is being assessed in the DGEIS.

More importantly, it flies directly in the face of how modern waste transfer and processing facilities actually operate – investments in expanded processing capacity are most likely to be made in automated/mechanized systems (including robotics), and not in additional picking-and-sorting jobs (which generally are regarded as low-quality jobs to be minimized) – as evidenced in the operation of the state-of-the-art Sims MRF operated under contract to DSNY. In addition to modeling, actual consultation with facility operators should be conducted.

Throughout the DGEIS, rhetorical assertions about reductions/improvements in truck traffic, street congestion, air quality, noise and quality of life is unsupported by data and hard analysis and remain just that – rhetoric. This lack of data and analysis simply makes it impossible to provide meaningful comment on the DGEIS. For instance, noise complaints collected by the Department of Environmental Protection are not cited, most likely because they do not support the assertion that commercial waste vehicles are a significant source of such complaints. As the purpose of an EIS is to provide benchmarks of the present as well as a path to assessing actual changes over time – and consideration of alternative means - this DGEIS does too little of each.

The DGEIS’ apparent rejection of the “exclusive” zone alternative provides another area of concern, in part related to the unsupported presumptions about the efficacy of the consultative process in which most participants remained highly skeptical about and unsupportive of the DSNY Plan (as evidenced by several communications by a key group of its members with the DSNY Commissioner and Mayor). Because a “monopoly” system was rejected by DSNY and not fully vetted by the Commercial Waste Zone Advisory Board; if the final EIS in fact recommends that it be formally considered – either in addition to or as an alternative to the multi-provider Plan – such a decision must serve as a prompt to reconvene that Board, and to re-do the EIS process.

In total, the DGEIS fails in nearly comprehensive terms to provide the “hard look” required for a full and detailed assessment of the DSNY proposed CWZP; it especially lacks essential transparency in its inclusion and presentation of data, analysis and other justifications for its many assertions of the alleged, but at this point, largely undemonstrated environmental benefits of the CWZP.

To the extent it relies on models for its presumed conclusions, its presumptions about industry operating costs, potential savings from collection efficiencies, etc., also should be tested through real-world interviews with industry participants. In light of the above, DSNY must prepare a supplemental DGEIS which addresses the above issues and which will allow for appropriate review and comment by the public.

Specific comments on the DGEIS include:

1. The analysis of Direct Business Displacement should presume that a bare minimum of companies – as few as five - are awarded zone contracts. It should further presume and be analyzed that one or more national companies that not currently operate in the city are awarded zone(s). Extensive consolidation and/or bankruptcies among the existing smaller and mid-size waste hauling companies must be anticipated and analyzed.
2. The assertion that 139 jobs might be created as a consequence of the presumed increase in waste diversion must be supported by data and analysis – or deleted because it violates the “boundary” of what is being analyzed in the DGEIS, i.e., collection-related services.
3. The assertion that waste diversion would increase (both recyclables and organics) must be supported by hard data and analysis. New York already has a robust waste diversion system in operation defined by both law and regulations, as well as generations of experience, and limited or down-turned markets for many recyclables have created a long-term challenge for waste service providers – a critical factor ignored by the DGEIS (again the DGEIS improperly assumes no disposal costs for recycling or organics).
4. The absence of a comprehensive locally-focused waste composition/characterization study must be explained; the California waste generation model offered as a proxy should be deleted/rejected as outdated and irrelevant to understanding current local commercial waste conditions in NYC. A comprehensive waste composition/characterization study must be completed prior to establishing the number and size of zones, let alone determining actionable waste diversion projections.
5. The DGEIS does an incredibly superficial and unsupported analysis on the impacts of the CWZP on existing BIC-licensed waste service providers. The assertion that displaced waste service companies would transition to other work, e.g., collecting construction and demolition debris, must be supported by data and analysis, as well as informed by real-world discussions with such companies. A hard look at the number of companies

expected to exit the industry by January 1, 2020 – and beyond - must be conducted. The real-world experience of other cities (e.g., Los Angeles, San Jose, Seattle) that shifted to a zone-franchise system and now lack a competitive infrastructure with multiple service providers – and much higher service costs - should be used to provide a much more meaningful analysis.

6. The presumed system of “rate-caps” as applied to zones by multiple service providers desperately needs further explanation and analysis, especially if each provider operates with a different approved rate-cap that will confuse customers and likely result in similar types of generators paying varying amounts for waste-related services – undermining one of the CWZP’s goals.
7. Larger facilities (e.g., office buildings, hospitals, etc.) throughout the city that have efficient operations and rely primarily on the ability to fill an entire container (or compactor) or truck at a single location should be studied as to what if any benefits might be presumed. Similarly, customers that are sophisticated with respect to the environmental standards which they impose on their waste haulers should be studied as to what if any benefits might be gained from the CWZP and how the CWZP will affect these programs.
8. The likelihood that certain trucks operating within a confined zone may operate at less than full loads must be considered when analyzing VMT’s and industry operating costs.
9. The assertion that the current system “lacks transparency” with respect to pricing of services must be supported by data and analysis; it is not universally shared by the business community. Assertions as to how a new system might be more or better transparent also must be explained and supported.
10. Labor costs associated with the prospect of changing work rules (e.g., hours/days of service, increased benefits, etc.) should be studied – both to ascertain the current situation and project the cost and other implications of possible changes on prices to customers and service impacts.
11. The assertion that truck traffic during the transition period will increase is extremely important. Yet, it is provided as an afterthought with no attempt to quantify or analyze impacts. This issue should be supported by additional data and analysis, especially given that it could extend for two years or more.

12. An analysis of BIC-issued licenses – within the last five (5) years – should be conducted in order to understand how many companies have entered and exited the industry, and the relative size of each. Consideration of a limit on BIC-issued licenses should be analyzed as an alternative.
13. In the DGEIS assessment of VMTs, a full and complete explanation of how VMT reductions were estimated including a detailed explanation of DSNY’s assumptions for VMTs under current conditions must be provided. This lack of underlying data and information makes it impossible to comment meaningfully on DSNY’s analysis. In our scoping comments, we pointed out many erroneous and misleading assumptions being made by DSNY which grossly overstate the reduction in VMTs associated with the CWZP. Rather than address these comments, DSNY altered assumptions (asserted reductions in VMTs have dropped to 50%) but without any explanation or data.

Among other things, a full explication of the most current data provided by the industry (March 2018) must be provided. The analysis of BIC-licensed companies and the collection services provided should be segmented and services provided separately by packer-trucks and container-trucks should be separately analyzed. For example, it is well known that Staten Island is served by four waste service providers that provide regular collection services by packer-trucks; the additional companies cited in the city’s analysis most likely provide occasional container service, not regular waste collection service. If container-waste service providers are prohibited from offering services to Staten Island customers, analysis should be provided explaining how those services will be provided.

14. The alternative approach to the city’s goals framed in Intro 996 should not be dismissed as it is broadly supported; it merits serious evaluation as an effective, collaborative means of pursuing many of the city’s goals sooner, better and cheaper and without the risks associated with the DSNY CWZP. The recent adoption of new laws and regulations, e.g., liability insurance, union officer certification, accident reports, etc., affirm that the city can pursue immediate improvements to its regulatory system on an as-needed basis. In addition, the collaborative process recently announced by the Mayor to consider alternative approaches to the reconstruction of the BQE affirms that consensus-based approaches with effective stakeholder engagement can be employed to solve complex challenges.

15. The assertion that operating costs of waste service companies might be reduced 2% through collection system efficiencies must be supported by transparent data and analysis. Fair consideration of the projected impact of higher costs for vehicles, labor, disposal, insurance, fuel, etc. must be included in the analysis. Unfortunately, once again, so little data is provided about where numbers come from that it is impossible to provide meaningful comments.
16. The assumption under the No Action scenario that routes, frequency, durations and pick up times are presumed to remain essentially the same ignores current industry consolidation (consolidation which is acknowledged in the DGEIS) and the high degree of likelihood of significant consolidation in the future in light of upcoming mandates, which inherently will affect industry operations, economics and efficiencies sooner than through implementation of the CWZP.
17. The expectation that DSNY will serve as the “carter of last resort” in the event that a service provider is unable to provide the required services before, during and after implementation of the transition to CWZP requires further analysis as to the potential impact on DSNY operations, costs, billing of customers, etc.
18. Under the No Action scenario, it should be assumed that all BIC-licensed companies will operate LL145-compliant collection trucks (as of 12/31/2019) with sideguards (as of January 2024; the no action alternative must include the current use of on-board cameras, GPS and other safety-related technology, and project their adoption over the next three years prior to any franchise-related requirement
19. Under the No Action scenario, it should be assumed that all BIC-licensed companies provide collection services for waste, recyclables and organics as required by law and regulations. Asserted increases over existing conditions must be documented with data.
20. The requirement for third-party waste audits requires further analysis regarding its cost and overall efficacy.
21. Alternative means of promoting capital investment in equipment and facilities should be identified and evaluated as to their efficacy. The CWZP presumptions about incentivizing capital investment must be supported by data and analysis

22. The lessons learned from cities, e.g., San Diego, Boston, Chicago, opting not to pursue geographic zone systems should be identified and assessed.
23. The real possibility that electric-powered collection trucks could be introduced within three to five years and become a standard within ten years – especially through an aggressive effort supported by the State and City – should be assessed with regards to achieving the city’s environmental goals, as well as potentially reducing operating costs for service providers under no action and action alternatives.

Conclusion

While the above comments focus on the across-the-board inadequacy of the data and analysis provided in the DGEIS, it also should be noted that “the city is not a computer”, nor are essential, complex and comprehensive waste services provided by automatons and robots. In fact, the city benefits in a host of ways – most of which are taken for granted – from the generations of embedded knowledge represented by companies that have operated in many cases for generations and understand the particularities and nuances of navigating every neighborhood of the city - under every type of situation – including weather emergencies, natural disasters and post-9/11.

DSNY’s approach to the CWZP and this DGEIS completely ignores this embedded knowledge from the front cover to the last page of Appendix B (in terms of explaining baseline conditions, to developing projections and assumptions about future operating conditions (both via action and alternatives) to impact analysis and mitigation). As a consequence, it creates and appears to tolerate a host of unknowns, undermines the DGEIS at every turn and will virtually ensure a host of unanticipated consequences as a result of implementing the CWZP.

As proposed – in either a monopoly or multi-provider form - CWZP will affect the essential service of managing commercial and industrial waste for the city’s businesses for the next fifty years or more, and risk losing much if not all of that knowledge and wisdom. Therefore, it is essential that the city take the extra time to ensure a comprehensive analysis of existing conditions and impacts of the CWZP.

More importantly, it is respectfully but strongly suggested that DSNY work to develop a broad consensus around its goals – both new and old, the alternative methods for pursuing them and the institutional capabilities required for the implementation and effective management of any new scheme.

The twenty-year investment in the work of the Business Integrity Commission – largely regarded as successful in achieving its challenging mission – should be celebrated and not discarded for the sake of an “idea” that is unprecedented and untested and encompass risks that are being in



Testimony from THE POINT CDC for the Public Hearing on NYC Commercial Waste Zones Environmental Impact Statement (DSNY).

Good Evening, my name is Fernando Ortiz; I am the Climate Preparedness and Resiliency Organizer for THE POINT CDC which is a non-profit organization dedicated to youth development and the cultural and economic revitalization of the Hunts Point section of the South Bronx. Our mission is to encourage the arts, local enterprise, responsible ecology, and self-investment in the Hunts Point community. We are also leading a community based climate resiliency plan, called the *South Bronx Community Resiliency Agenda*. I am here today to show support for the NYC Exclusive Commercial Waste Zone program's Environmental Impact Statement and to ensure that impacts of EJ communities are at the forefront in proposed legislation. Hunts Point is in the South Bronx Significant Maritime Industrial area— one of six in New York City. This zoning designation allows for heavy industrial activity and maritime use within our community such as the Hunts Point Food Market, 15 waste transfer stations, the Hunts Point Wastewater Treatment Plant, four power plants, 23 auto dismantlers and 11 scrap metal processors and other industries like Fresh Direct that require high volume of diesel-trucks passing through our community. The Major Deegan Expressway, the Sheridan Expressway and the Bruckner Expressway also border our communities.

The South Bronx is home to about 6.5% of the city's population yet, handles 100% of the Bronx waste and about 30% of all of NYC waste. The proximity to hazardous waste sites and to high truck traffic intensifies the public health concerns around poor air quality in the South Bronx. An estimated 20,000 diesel-fueled trucks pass daily through Hunts Point making their way through the expressways or from the industrial sites located within our communities and making pedestrian streets unsafe to cross. The South Bronx forms part of the infamous "Asthma Alley" because it has some of the highest asthma rates in the city. Hunts Point ranks among the highest community with PM2.5 contaminants in the air, harmful particles that enter our respiratory system and contribute to illnesses such as asthma and lung cancer. The asthma rates in the South Bronx are 8 times the national average, with 1 in 4 children suffering from asthma and with 33% children hospitalizations occurring within the South Bronx and asthma



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death rates four times higher than the national average. Other harmful pollutants in our air include Ozone (O₃), Benzene and Formaldehyde- all known carcinogens.

THE POINT supports the NYC Commercial Waste Zones EIS because of the benefits it can provide for the South Bronx and for other environmental justice communities throughout NYC. The exclusive commercial waste zones will result in significant reductions in air pollution, ghg emission, and noise, by taking miles of truck traffic off of NYC city streets. While the waste equity bill passage last year was instrumental in garnering the reductions in permitted waste capacity in Brooklyn, the Bronx, and Southeast Queens, we believe that the forthcoming legislation can further prioritize EJ communities and ensure reduction in vehicle miles by ensuring that waste is transported to the waste transfer stations geographically closest to the waste collection zones. We encourage a mandatory truck count monitoring to ensure that vehicular transport is actually reduced in communities like ours where on some corners in the *South Bronx*- 304 trucks/hour, drive by, 45% of which are waste trucks. This would result in dramatic reductions in PM 2.5 emissions and other air pollutants. Furthermore, we encourage the incentivization of commercial waste haulers to utilize nearby marine transfer stations (MTSs), which are equitably distributed throughout the city - at the MTS's, marine barges have the capacity to displace vehicle miles from the export of waste from 48 long haul diesel trucks. I also hope that this bill considers the issue of overnight waste storage on the roads in Hunts Point.

This is the immediate next step in overcoming the disproportionate overburden that the community has endured due to the high concentration of transfer stations and truck traffic in our community. We applaud your efforts to analyze exclusive commercial waste zones and encourage you to move forward with this implementation and to prioritize environmental justice communities that have held the burden of waste inequity for far too long.

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April 8, 2019

Abas Braimah
New York City Department of Sanitation
Bureau of Legal Affairs
125 Worth Street
Room 708
New York, New York 10013

Re: Comments of the Real Estate Board of New York on the Draft Generic Environmental Impact Statement for the Commercial Waste Zones Program

Dear Mr. Braimah

This firm represents the Real Estate Board of New York (REBNY) as special counsel with respect to the Department of Sanitation's (DSNY) proposed Commercial Waste Zones Program (the "CWZ Proposal"). REBNY is a trade association for New York's real estate industry which advocates on behalf of the mutual interests of its members by promoting public and industry policies. REBNY's membership includes, among others, owners of commercial property throughout the New York City who rely upon comprehensive and efficient commercial waste hauling services for their buildings.

DSNY, as lead agency under the City Environmental Quality Review (CEQR), determined that a Draft Generic Environmental Impact Statement (DGEIS) is required for the CWZ Proposal. On November 5, 2018, DSNY, pursuant to CEQR Section 5-07 and 6 NYCRR 617.8 (New York State Environmental Quality Review or SEQRA), published notice of a public scoping meeting scheduled for December 11, 2018 in connection with DSNY's preparation of the DGEIS (the "Scoping Meeting"). On November 9, 2018, and in advance of the Scoping Meeting, DSNY released a Draft Scope of Work for the DGEIS (the "DSOW") (CEQR No. 19DOS003Y). On February 22, 2019, DSNY published its Notice of Completion and Notice of Hearing for the DGEIS. This letter serves as REBNY's comments on the DGEIS.

REBNY supports DSNY's goal to promote a safe and efficient waste collection system that provides high-quality, cost-efficient service while advancing the City's sustainability and recycling programs. However, REBNY remains concerned that the proposal set forth in the DGEIS severely restricts competition among private carters by limiting the number of providers authorized to operate within designated zones, and, in doing so, would diminish the ability of commercial property owners to better achieve these same goals themselves.

Commercial property owners gain significant benefits—including better pricing and operational efficiencies—due to their ability to manage waste collection operations across an entire building portfolio. The leverage created by this type of “group purchase” allows owners to be highly selective in identifying the carter(s) who best meet(s) their needs and can provide a high quality of service. The efficiencies gained by these buildings would be imperiled by the CWZ Proposal. The same is true for an owner of even a single large commercial building.

Moreover, the CWZ Proposal harms commercial property owners without realizing any environmental benefits, as any assumed environmental benefits (*i.e.*, decreases in truck vehicle miles traveled (VMT)) would not be realized if the CWZ Proposal applied to these buildings. This fact remains unaddressed in the DGEIS and demands further study. Further, commercial property owners also currently have significant leverage to require that carters adhere to stringent environmental standards. Consequently, the CWZ Proposal poses significant business risk to large commercial property owners without providing demonstrable environmental benefits to the public.

Quite simply, the DGEIS does not take the requisite “hard look” at the potential of the CWZ Proposal to significantly affect business conditions in the commercial real estate market, particularly with respect to Class ‘A’ properties that are critical to New York City’s economic health and vitality.

Current Waste Management Practices

Large commercial buildings in central business districts typically contain loading docks that are used during day and night-time hours. Waste management within these buildings is carefully orchestrated to ensure that waste is timely picked up with minimal disruption to tenants and the public’s quality of life (*i.e.*, conflicts with other building operations and pedestrians, truck traffic on surrounding streets, rubbish spill over onto the public sidewalk).

Owners work closely and on an on-going basis with carters to adjust service needs, coordinate pick up times or request additional pickups, if necessary. The service needs of large buildings differ from building to building depending on the tenancies, surrounding uses (*i.e.*, public or highly trafficked areas) and building layout. Carters and owners also work together to routinely audit and evaluate carter performance to ensure that they are efficiently designed and that pickups remain regularly scheduled.

Many large office buildings also use a compactor for trash management. For these buildings, a carter arriving at the building will remove the compactor, load the compactor onto its truck and bring the compactor directly to a waste transfer station. The direct transportation of the compactor to the waste transfer station means that VMT’s are at the minimum possible; there is no ability to reduce them further.

To illustrate: 601 Lexington Avenue is a large commercial building of approximately 1.6 million square feet. It contains two, thirty-yard compactors that a carter picks up and brings directly

to a transfer station. The building owner gathers waste generated by its tenants on a daily basis and separates wet waste, recycling and organics for collection. The building's carter picks up dry waste three times a week and wet waste three times a week by monitoring the needs of the building and providing a quick pick-up when the compactor gets full (all pick-ups occur between 1:00am and 3:00am). Multiple trucks may service the building on days when multiple waste streams are collected and then driven directly back to the waste transfer station.

Other large buildings that use containers for trash management operate in a similarly efficient manner. For these buildings, a carter uses a packer truck and directly fills its truck with the waste from the containers. Carters removing waste from these large commercial office buildings similarly utilize a direct route to the building and then to the transfer station because the waste volume removed from the building's containers fills an entire packer truck. As in the case of buildings with compactors, the direct route to the waste transfer station means that VMT's are at the minimum possible; there is no ability to reduce them further.

To illustrate: 1114 Avenue of the Americas is another large commercial building of approximately 1.5 million square feet. However, instead of using a compactor it disposes of its waste via bags loaded into a packer truck. The carter picks up this waste five times a week, and in each instance the waste fills up an entire packer truck. The packer trucks travel directly to the waste transfer station after servicing the building.

CWZ Proposal Negatively Impacts Large Building Owners

The CWZ Proposal proposes the creation of twenty geographic zones within which at least three, but no more than five, carters will provide waste management services within a zone. Consequently, the CWZ Proposal will restrict competition and a building owner's choice of carter.

As applied to large commercial property owners in central business districts, this would reduce the owners' significant buying power, leading to increased prices and a reduction in the ability to achieve service efficiencies as well as high environmental performance. The ability of a building owner to insist on high levels of customer service, including meeting tight pick-up windows and adherence to waste separation policies, is critical to effectively running a large commercial office building. The CWZ proposal would undermine the ability of a building owner to ensure a carter meets those standards by constraining their ability to replace a poor performer. This risk is particularly high for large commercial buildings in zones where lower numbers of carters are authorized to work.

CWZ Proposal Mischaracterizes the Environmental Benefits

The CWZ Proposal's ostensible goal is to reduce the overall VMTs associated with commercial waste removal in New York City. This goal is not furthered by applying the zone system to large commercial buildings in central business districts. As discussed above, due to the use of compactors and/or containers and the significant waste volumes produced by these

buildings, carters make a single trip to the building and then proceed immediately to the transfer station. The CWZ Proposal would not result in any appreciable reduction in VMT's generated by waste pick-ups and disposal from these disposals.

Indeed, the City itself recognized this in its 2018 Commercial Waste Zones Implementation Plan (Appendix, pp. 25-26). In the "Vehicle Miles Traveled Simulated Methodology" section, which sets forth the steps taken to determine the "new routes for the various zone design scenarios", DSNY explicitly noted that "*roll-on roll-off container customers were not altered in the simulated routes*" and that roll-on roll-off routes (i.e., where the building uses a compactor) were "*set equivalent to the baseline scenario, as the distance for these routes will not be directly impacted by CWZ*" (emphasis added).

DSNY has therefore acknowledged that the CWZ Proposal, as applied to large commercial building owners who dispose waste into compactors, *will not result in any reduction in VMTs*.

Exclusive Zone Alternative

The DGEIS also does not take a "hard look" at the socioeconomic impacts that would result from the "Exclusive Zone Alternative".

The potential transition to an exclusive zone system would represent an even more radical shift in the manner in which waste is currently collected. The carting industry could potentially shrink from approximately one hundred carters to twenty or fewer carters (one per zone). The Exclusive Zone Alternative would disproportionately affect large building owners, as according to the DGEIS, "the elimination of competition within commercial waste zones has the potential to increase the costs of commercial carting services on customers and could lead to a reduction in customer service and satisfaction due to the single-service provider monopoly created by an exclusive zone system." (DGEIS at 9-14). While this statement is accurate, it does not represent a sufficient analysis of the impacts that would result from adoption of the Exclusive Zone Alternative.

This is illustrated by the experience in Los Angeles, which recently transitioned to an exclusive zone waste collection system called RecycLA, and has experienced a myriad of problems, many of which have not been remedied. For example, in December 2017, the City of Los Angeles received so many complaints that it was forced to send its own sanitation workers out to collect trash from 150 accounts, and in some instances these sanitation workers determined that collections had been entirely neglected.¹ Additionally, commercial property owners saw carters

¹ *LA council members tear into city's waste haulers over RecycLA debacle*, WASTE TODAY (Feb. 8, 2018), <https://www.wastetodaymagazine.com/article/la-recycla-city-council-complaints/>.

April 8, 2019
Page 5

who were awarded exclusive zone contracts raise fees by up to 400% while providing inferior pick up and customer service.² Other reports noted that certain buildings trash bills rose up to 100%.³

Los Angeles' struggle to manage its exclusive zone system cannot be ignored in the analysis of the Exclusive Zone Alternative. The analysis must include an in-depth consideration of impact on "Socioeconomic Conditions" as well as how a deterioration in service conditions would impact the broader quality of life, including health and safety.

Conclusion

The DGEIS does not take a "hard look" at the socioeconomic impacts on commercial property owners in the City's central business districts. As recognized by DSNY, application of the CWZ Proposal for large commercial buildings in central business districts would not result in any reduction in VMTs or other environmental benefits. Instead, the CWZ Proposal would eliminate the opportunities large building owners currently enjoy to insist upon and obtain high standards of service, reasonable prices, and compliance with environmental requirements. The FEIS must consider these impacts upon the Class 'A' office sector, and consider reasonable alternatives which would reduce or eliminate these impacts. These should include an exemption for large commercial office buildings located in central business districts, and other changes to address the concerns stated above, including significantly increasing the number of carters in each of the Midtown Manhattan, Financial District, Downtown Brooklyn and Long Island City "Core" zones.

Respectfully Submitted,



David Karnovsky

² *L.A. Board of Public Works Approves RecycLA Settlement*, WASTE 360 (Feb. 19, 2019), <https://www.waste360.com/legal/la-board-public-works-approves-recycla-settlement>; Elijah Chiland, *LA officials demand answers over maligned new trash program*, CURBED LOS ANGELES (Feb. 7, 2018 11:20 AM), <https://la.curbed.com/2018/2/7/16980778/recycla-los-angeles-trash-problem>.

³ Sharon McNary, *Commercial Recycling in LA Will Be Free And Millions in Refunds Will Be Handed Out*, LAIST (Feb. 15, 2019 11:21 AM), <https://laist.com/2019/02/15/after-recyclas-rocky-rollout-commercial-recycling-in-la-will-be-free.php>; *LA City Leaders Take Aim At Controversial Trash-Hauling Program*, PATCH (Feb. 7, 2018 2:06 AM), <https://patch.com/california/northridge/la-city-leaders-take-aim-controversial-trash-hauling-program>; David Zahniser, *Higher rates, missed pickups: L.A. is hearing a rash of complaints about its new waste removal system*, LOS ANGELES TIMES (August 7, 2017 5:00 AM), <https://www.latimes.com/local/lanow/la-me-ln-trash-pickup-franchises-20170807-story.html>.

Kathryn Garcia
Commissioner, NYC Department of Sanitation
125 Worth Street
New York, NY 10013

Dear Commissioner Garcia:

The proposal to divide the City into 20 commercial waste zones, each of which would be serviced by 3 to 5 carters, selected by the City, is sweeping in its scope and would represent an enormous change from existing practices. Any proposal of this magnitude, which will impact every business in the City, requires careful evaluation and consideration.

However, the complicated Draft Generic Environmental Impact Statement (DGEIS), the Department of Sanitation is giving, is close to the statutory minimum in terms of hearings and comment period days. There are only two hearings, both in Manhattan, one in the day and one in the evening. The comment period is approximately 38 days, including weekends. Neither of these situations provides sufficient opportunity for the public to review, understand, and comment on the DGEIS.

We believe this situation could be remedied with additional hearings and a longer comment period. At a minimum, there should be a hearing in every Borough, including more than just one in the evening. In addition, we recommend that a comment period of at least 120 days be in order to develop and submit comments on the DGEIS.

I thank you in advance for your time and attention in this matter.

Sincerely,



Hani J. Salama, P.E., LEED AP
President, BOMA New York



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Robert Walsh, Manhattan College

Kathy Zamechansky, KZA Realty Group, Inc.

Via Email: cwzcomments@dsny.nyc.gov

Abas Braimah

New York City Department of Sanitation

Bureau of Legal Affairs

125 Worth Street, Room 708

New York, New York 10013

March 11, 2019

Re: Requests for Extension of Time for Submission of Written Comments on Draft Generic Environmental Impact Statement ("DGEIS") for the Proposed New York City Commercial Waste Zone Program, and to Schedule Additional Public Hearings on the DGEIS

Dear Mr. Braimah:

The Bronx Chamber of Commerce is extremely interested in New York City's (the "City's") proposal to implement a commercial waste zone program and its prospective effect on our business, our customers, and the environment. As such, The Bronx Chamber of Commerce desires to comment upon the above-mentioned DGEIS to the New York City Department of Sanitation ("DSNY"). However, providing only an approximate 30-day period to review, evaluate, and prepare detailed comments based upon the simultaneously released 186-page DGEIS and the 507-page Final Scope of Work for the proposed establishment of commercial waste zones is neither adequate nor reasonable. In addition, because this proposal will affect The Bronx Chamber of Commerce and other stakeholders throughout the City, public hearings on the DGEIS should be held at locations in all five boroughs, rather than only in Lower Manhattan.

For these reasons, and in the interest of developing a complete record informed by a sufficient opportunity for review of the DGEIS, The Bronx Chamber of Commerce respectfully requests that the deadline for submission of comments on the DGEIS to the New York City Department of Sanitation be extended at least 60 days -- i.e., through Friday, May 31, 2019 -- to offer sufficient time for interested stakeholders to analyze the DGEIS and prepare comments that will help ensure a "hard look" at the environmental impacts of the Commercial Waste Zone Program.

The Bronx Chamber of Commerce also requests adjournment of the public hearings scheduled for March 11 and 14, 2019, at 125 Worth Street in Manhattan; and that new public hearings on the DGEIS be scheduled to take place in each of the City's five boroughs.

Very truly yours,

Lisa Sorin, President



**MANHATTAN
CHAMBER OF
COMMERCE**

**CHAIRMAN
MICHAEL KEMPNER**

**PRESIDENT & CEO
JESSICA WALKER**

March 14, 2019

Abas Braimah
New York City Department of Sanitation
Bureau of Legal Affairs
125 Worth Street, Room 708
New York, New York 10013

Re: Requests for Extension of Time for Submission of Written Comments on Draft Generic Environmental Impact Statement ("DGEIS") for the Proposed New York City Commercial Waste Zone Program

Dear Mr. Braimah:

The Manhattan Chamber of Commerce - an organization that drives broad economic prosperity by helping businesses of all sizes to succeed in New York - is extremely interested in New York City's proposal to implement a commercial waste zone program and its prospective effect on our member businesses, their customers, and the environment.

As such, the Manhattan Chamber of Commerce desires to fully review this proposal with our members and comment upon the above-mentioned DGEIS to the New York City Department of Sanitation. However, providing only an approximate 30-day period to review, evaluate, and prepare detailed comments based upon the simultaneously released 186-page DGEIS and the 507-page Final Scope of Work for the proposed establishment of commercial waste zones is neither adequate nor reasonable. More time is required to ensure that the Manhattan Chamber of Commerce can review this proposal with our members and adequately represent their interests and concerns.

For these reasons, and in the interest of developing a complete record informed by a sufficient opportunity for review of the DGEIS and its potential negative impact on local businesses, the Manhattan Chamber of Commerce respectfully requests that the deadline for submission of comments on the DGEIS to the New York City Department of Sanitation be extended at least 60 days -- i.e., through Friday, May 31, 2019 -- to offer sufficient time for interested stakeholders to analyze the DGEIS and prepare comments that will help ensure a comprehensive "hard look" at the environmental impacts of the Commercial Waste Zone Program.

Thank you for your consideration.

Sincerely,

Jessica Walker
President & CEO
Manhattan Chamber of Commerce



Mason Tenders District Council

O F G R E A T E R N E W Y O R K & L O N G I S L A N D

Tamir Rosenblum

GENERAL COUNSEL

trosenblum@masontenders.org

April 8, 2019

By Electronic Mail

New York City Department of Sanitation
125 Worth Street
New York, NY 10013
cwzcomments@d sny.nyc.gov

*Re: DSNY Commercial Waste Zone Project Draft Environmental
Assessment Statement*

To Whom It May Concern:

Please accept this letter as the comments of Waste Material, Recycling, and General Industrial Laborers Local 108 (“Local 108”) regarding the Environmental Assessment Statement referenced above.

The study’s analysis of socioeconomic impacts is woefully incomplete and regrettably confirms workers’ worst suspicions about the consistent adverse effects of environmental regulation on employment and employment opportunities. Absent real and robust wage, benefit, and safety standards, the proposed program will have incredibly adverse socio-economic impacts which the study just ignores.

The thinness of the study’s treatment of socioeconomic impacts is typified by its ultimate conclusion on the subject. It finds that there will be a two percent decrease in employment in the industry which, although considered an adverse consequence, is all the same supposedly ameliorated by the anticipated two percent drop in employer operating expenses and possibility of new jobs arising in recycling work.

It is not clear how a two percent drop in employer operational expenses helps workers, especially if it is apparently being achieved substantially through a two percent drop in their employment.

In addition, in predicting the emergence of new recycling jobs, the study lacks substantive analysis of the types of jobs that will be lost versus those that will be created and moreover fails to address the current market conditions for recyclable debris. The study's disregard for the zoning system's potential disruptive effects further evidences the analysis's lack of methodological rigor.

The study takes no account of the socioeconomic effects that transpire if workers who have spent their careers building retirement benefits and maintaining health insurance through multi-employer trust funds lose those benefits because their employers go out of business or are no longer able to provide the benefits under a new system—for example, because of the likely entry into the market of large (non-union) corporate haulers.

The cursory treatment of the effects of the zoned system on employment typifies an increasingly rejected version of environmentalism, in which effects on working people are ignored—or worse, given mere lip-service. The consequence of this sort of environmentalism is that any positive environmental outcomes are achieved at the expense of workers, undermining working class support for such initiatives to the long term detriment of environmental causes, and, more importantly, further exacerbating economic inequality.

Recent talk of a Green New Deal finally recognizes this long-standing, self-defeating dynamic of many such environmental programs, but the current proposal was clearly designed without such concerns in mind.

A zoned system could still be engineered to meet the real needs of labor and environmentalists (assuming those need to be separate categories). For example, the standards for selection of contractors should place a high value on the terms and conditions of employment bidders offer their employees as well as on the risk their non-selection presents to the disruption of existing forms of benefits, such as health care, pension, and training. The disruption of those benefits will place *socioeconomic burdens* on the community which the study simply ignores.

Still more effective would be to set a minimum value on the monies contractors must spend on employee compensation, thereby essentially establishing a prevailing wage. Absent that, the DOS-run system will simply involve managing groups of four or five contractors within respective zones who will be competing largely over price. Route efficiencies, which are currently a distinguishing factor, will no longer greatly matter because the zones effectively dictate that, so low employee compensation is likely to become the driving force.

As another example of the disregard of workers manifest in the study and the proposed “Action” it analyzes, the current program speaks of elevating safety standards by estimating a mandatory 16-hour biannual training requirement. In supporting a zoned system, the New York Committee for Occupational Safety and Health recommended a mandatory 40-hour training program for all workers in the industry. That apparently has been rejected without explanation. High-performing companies in the industry right now probably on average provide more than 16 hours of biannual training, meaning the proposed “new standards” are so minimal they may actually serve to lower the bar. None of this gets discussed in the EAS.

The need to convince working people that environmentally-based regulatory change will not happen at their expense is too urgent a matter to allow the EAS’s woefully inadequate analysis of socioeconomic issues to stand as the last word.

Absent real protections for workers—including rules and standards that actually benefit them—Local 108 continues to stand in opposition to the proposed new regulatory regime.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tamir W. Rosenblum". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Tamir W. Rosenblum

Comments of Justin Wood
Director of Organizing and Strategic Research
New York Lawyers for the Public Interest
On the Draft Generic Environmental Impact Statement for the
Commercial Waste Zones Plan
March 11, 2019

The Draft Generic Environmental Impact Statement (DGEIS) for the Commercial Waste Zones Project confirms basic findings of several previous studies of the NYC private carting system which showed the great potential environmental benefits of a zoned waste collection system, and affirms what workers in the industry have known for decades: The current commercial waste system is grossly inefficient and unsafe, and our City can greatly improve working conditions and safety while reducing pollution, the amount of waste sent to landfill, *and* operating costs by adopting a far more efficient and accountable commercial waste zone (CWZ) system.

Efficiency and Cost Savings

Based on recent route sheets and customer data submitted by the carting industry, the DGEIS definitively shows that on a citywide basis, thousands of large, diesel waste trucks drive much farther than necessary to move commercial waste from generators to recycling and transfer facilities, and that workers are pressured to work much longer overnight shifts than would be necessary in an efficient system. Notably, the results of the environmental review demonstrate that haulers can reduce and contain operating costs under a zone system, creating system-wide savings that can be invested in better labor standards, fair prices for customers, cleaner truck engines, better recycling practices, and better customer education.

In addition to the non-exclusive CWZ plan proposed in the City's implementation plan, the DGEIS includes analysis of an exclusive waste zone scenario, in which a single, accountable waste provider is selected to serve customers in each of 20 zones via a competitive RFP process. Both vehicle miles traveled reductions and operating cost savings would be significantly more pronounced under an exclusive system than a system with multiple haulers allowed in each zone. The DGEIS finds that an exclusive zone could reduce VMT in Midtown Manhattan by 79%, with 66% and 63% reductions in the Queens and Brooklyn neighborhoods studied. This translates into a substantial \$23 million in operational cost savings compared to a "No Action" scenario--not to mention a reduction in emissions and greenhouse gases as trucks are traveling shorter and more efficient routes.

Waste Diversion

The DGEIS also examines the impact a CWZ system will have on commercial waste diversion -- which will need to be rapidly improved if we are to have any hope of making the City's Zero Waste and greenhouse gas reduction goals a reality.

This study finds that, due to the far more efficient private carter operations in a CWZ system, commercial recycling can be improved from a baseline of 25% to 44% without a substantial increase in carter and customer costs, and that the industry will experience a net increase in local jobs due to expanded recycling sorting and processing operations, which are far more job-intensive than landfilling and incineration.

The DGEIS confirms that a CWZ system is the only way to substantially increase commercial diversion without large increases in truck traffic and operating costs associated with even minimal diversion improvements in the "No Action" scenario.

However, the diversion scenarios in the DGEIS are quite modest, and a robust CWZ system combined with strong commercial waste reduction policies could perform far better than the 6% commercial organics recycling rate and a 44% overall commercial recycling rate assumed in this study. In fact, with a 44% commercial recycling rate, New York City would continue to lag far behind cities like Seattle, San Jose, and San Francisco, which have achieved better than 60% commercial diversion rates (65% in Seattle in 2017) driven by aggressive commercial organics recovery programs under versions of exclusive zone systems.¹

For example, even if NYC achieves the six-fold increase in commercial organics recycling envisioned in the DGEIS, our commercial sector would still be composting 20,000 fewer tons than Seattle's commercial businesses, in a city with ten times Seattle's population.

The DGEIS also assumes that only one in four customers would complete a third-party waste assessment to identify ways to reduce disposed waste through reduction, re-use, and recycling. By adopting policies to encourage or mandate objective, third-party waste assessments, the CWZ program could go even farther in helping businesses to reduce, donate, and recycle portions of their waste streams and reduce monthly garbage bills.

¹ Seattle reported a 65% commercial recycling rate for 2017, and a 7.3% increase in commercial organic waste tonnage and with a concurrent 1% decrease in garbage (landfill) tons collected in 2018.

Legislation

With the efficacy of the CWZ framework affirmed by this study, It is now up to the City Council and the administration to pass legislation that implements the strongest possible CWZ system, consistent with the social equity and environmental values our City has rightly adopted.

The CWZ legislation and resulting policy are where the promise of this reform will be translated into real, tangible benefits for New Yorkers, and must include:

- **Fairness for Workers:** The CWZ policy must ensure that workers are treated fairly by employers under a CWZ system. The operational savings for carters in a CWZ system must translate into living wages, retirement benefits, reasonable shifts, state of the art safety practices, and job security for the thousands of men and women who haul and process commercial waste. This is most feasible through an exclusive zone system, in which carters have fewer incentives to cut corners on safety, overload routes, and underpay workers.
- **Environmental Justice:** The CWZ policy must incentivize the use of state of the art facilities for processing waste, as well as facilities sited geographically proximate to the hauler's route and/or truck depot/garage. The City should use this opportunity to help communities overburdened with poorly sited truck-intensive transfer stations, and can facilitate the creation of hundreds of new, high-quality local jobs by incentivizing haulers to make investments in more equitably sited, safer recycling facilities through the CWZ RFP process.
- **Fairness for Small Business:** Under a CWZ system, prices for recycling and waste services should be transparent and rational, and every customer should have access to high quality service and effective enforcement mechanisms when needed. All small businesses should be able to access diversion services such as organics recycling and waste assessments, which are often unavailable them under the current system.
- **Waste Reduction:** The CWZ system should include disposal reduction targets for each zone consistent with the 90% reduction goal of One NYC. In addition to the recycling processing jobs included in the DGEIS, a high-diversion CWZ system can create hundreds of additional, good jobs in food rescue, electronics recycling, local organics processing, and facility construction, many of which can be targeted to disadvantaged local communities and MWBEs.
- **Cleaner Air:** In addition to the huge VMT reductions enabled by a CWZ system - especially an exclusive system - legislation can strongly incentivize haulers to replace diesel engines

with cleaner CNG and/or electric engines. In particular, an exclusive CWZ model would give haulers the long-term financial stability to raise capital and make these investments.

- **Safer Streets:** an efficient CWZ system -- especially an exclusive system -- will eliminate hundreds of unnecessary diesel truck miles from local neighborhoods every night, reducing pressure on workers to rush and speed, and with shorter shifts, decreasing the risk of fatigued driving. With the right legislation, this means less danger for pedestrians, cyclists, and drivers citywide, and safer, more humane working conditions for thousands of drivers and helpers in the industry.

Justin Wood
Director of Organizing and Strategic Research
jwood@nylpi.org
(212) 244-4664

Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Catherine Burgess (catherine.burgess.9@gmail.com)

As the City moves forward with plans to reorganize the way that commercial waste is collected, we affirm our support for an exclusive commercial waste zone system.

Under the current system, commercial waste carters – nearly 100 companies – crisscross the city every night on long and inefficient routes, collecting trash from offices, restaurants, and other businesses. The industry is plagued by companies with poor working conditions, polluting trucks, low recycling rates, and a high number of fatal crashes. Most of the industry's trash facilities are located in communities of color.

An exclusive commercial waste zone system has already been implemented in leading green cities like San Francisco and Seattle. DSNY's study found that exclusive commercial waste zones would reduce private garbage truck traffic by 60% across the city and is the most cost-effective way to collect commercial waste.

We need an exclusive commercial waste zone system in NYC to transform the way trash is collected in our city, improve working conditions, protect small businesses, reduce pollution and make our streets safer.

Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Robert Nelson (rsngc@outlook.com)

I live on a commercial street and I know that the street will be less frantic, quieter, safer, and my stress levels will be much lower if there were fewer trash hauling vehicles on it. In so many ways, exclusive zoning will enhance my longevity!

As the City moves forward with plans to reorganize the way that commercial waste is collected, we affirm our support for an exclusive commercial waste zone system.

Under the current system, commercial waste carters – nearly 100 companies – crisscross the city every night on long and inefficient routes, collecting trash from offices, restaurants, and other businesses. The industry is plagued by companies with poor working conditions, polluting trucks, low recycling rates, and a high number of fatal crashes. Most of the industry's trash facilities are located in communities of color.

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We need an exclusive commercial waste zone system in NYC to transform the way trash is collected in our city, improve working conditions, protect small businesses, reduce pollution and make our streets safer.

Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Saul Fishman (saulfishman1@gmail.com)

Safety for workers and the public would be enhanced by an exclusive commercial waste zone, which would simultaneously benefit our environment. I support this common sense plan, and urge NYC to do likewise!

As the City moves forward with plans to reorganize the way that commercial waste is collected, we affirm our support for an exclusive commercial waste zone system.

Under the current system, commercial waste carters – nearly 100 companies – crisscross the city every night on long and inefficient routes, collecting trash from offices, restaurants, and other businesses. The industry is plagued by companies with poor working conditions, polluting trucks, low recycling rates, and a high number of fatal crashes. Most of the industry's trash facilities are located in communities of color.

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Angel Martinez (amartinezlocal812@yahoo.com)

As the City moves forward with plans to reorganize the way that commercial waste is collected, we affirm our support for an exclusive commercial waste zone system.

Under the current system, commercial waste carters – nearly 100 companies – crisscross the city every night on long and inefficient routes, collecting trash from offices, restaurants, and other businesses. The industry is plagued by companies with poor working conditions, polluting trucks, low recycling rates, and a high number of fatal crashes. Most of the industry's trash facilities are located in communities of color.

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Jessica Thompson (violajess20@gmail.com)

As the City moves forward with plans to reorganize the way that commercial waste is collected, we affirm our support for an exclusive commercial waste zone system.

Under the current system, commercial waste carters – nearly 100 companies – crisscross the city every night on long and inefficient routes, collecting trash from offices, restaurants, and other businesses. The industry is plagued by companies with poor working conditions, polluting trucks, low recycling rates, and a high number of fatal crashes. Most of the industry's trash facilities are located in communities of color.

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Amanda Bell (aeb341@hotmail.com)

Help workers and the environment!

As the City moves forward with plans to reorganize the way that commercial waste is collected, we affirm our support for an exclusive commercial waste zone system.

Under the current system, commercial waste carters – nearly 100 companies – crisscross the city every night on long and inefficient routes, collecting trash from offices, restaurants, and other businesses. The industry is plagued by companies with poor working conditions, polluting trucks, low recycling rates, and a high number of fatal crashes. Most of the industry's trash facilities are located in communities of color.

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We need an exclusive commercial waste zone system in NYC to transform the way trash is collected in our city, improve working conditions, protect small businesses, reduce pollution and make our streets safer.

Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: John Stracquadanio (johnjss37@gmail.com)

As the City moves forward with plans to reorganize the way that commercial waste is collected, we affirm our support for an exclusive commercial waste zone system.

Under the current system, commercial waste carters – nearly 100 companies – crisscross the city every night on long and inefficient routes, collecting trash from offices, restaurants, and other businesses. The industry is plagued by companies with poor working conditions, polluting trucks, low recycling rates, and a high number of fatal crashes. Most of the industry's trash facilities are located in communities of color.

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We need an exclusive commercial waste zone system in NYC to transform the way trash is collected in our city, improve working conditions, protect small businesses, reduce pollution and make our streets safer.

Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Vincent Marino (vmarino916@gmail.com)

I am in support for the reforms for the commercial waste industry. We need to protect our workers in this industry and the everyday citizens it affects.

As the City moves forward with plans to reorganize the way that commercial waste is collected, we affirm our support for an exclusive commercial waste zone system.

Under the current system, commercial waste carters – nearly 100 companies – crisscross the city every night on long and inefficient routes, collecting trash from offices, restaurants, and other businesses. The industry is plagued by companies with poor working conditions, polluting trucks, low recycling rates, and a high number of fatal crashes. Most of the industry's trash facilities are located in communities of color.

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We need an exclusive commercial waste zone system in NYC to transform the way trash is collected in our city, improve working conditions, protect small businesses, reduce pollution and make our streets safer.

Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Liana Dalton (lianandalton@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Oury Diallo (doury66@gmail.com)

Mouctar Diallo was a good kid, and we demand justice for him, his family and all the other kids that come to this country dreaming of a better life while working under the books.

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Paul Host (paulhwmse@lycos.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Kasia Nikhamina (kasia@redbeardbikes.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Jason Schulman (jschulman@jjay.cuny.edu)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Julian Tysh (juliant@ibt814.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Bernadette Kelly (bfmcculloch@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Miranda Nelson (mirandabnelson@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Joshua Feinberg (jfeinberg@grownyc.org)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Catherine Davis (cwrightdavis@hotmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: TeriLee Huff (tlclocate@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Damion Da Costa (dliondamo@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Janette Gautier (janettegautier@verizon.net)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Bonnie Nelson (brnjj1@gmail.com)

Do this for the health and safety of all New Yorkers!

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Sandy Nurse (sandy@bkrot.org)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Jennifer McClung (jmcclung106@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Aurore Stanek-Griffiths (aurorestanek@gmail.com)

We need to improve NYC. Pollution is really bad here. It is a true disaster. We can't keep trashing our city this way.

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From: Guy Schaffer (guy.schaffer@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Leah Helmer (andrierieulover@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Meredith Danberg-Ficarelli (meredith@commongroundcompost.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Francine Kay (francymusic@msn.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Josef Reisenbichler (josefkuehn@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Carol Gresser (cabgresser@aol.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Carol Shuchman (carol.shuchman@gmail.com)

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From: Dennis Feichtinger (djfeich@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: John Winters (john@teamsters205.com)

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From: Frank Halstead (fwhalstead@hotmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Brent Barnes (btb9403@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Josephine Grudzien (grudzien1@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Liana Dalton (ldalton@teamster.org)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: John Stracquadanio (johnjss37@gmail.com)

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From: Jim Barrett (jjmbarrett@att.net)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: David Snead (giftlives@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Robert Sorice (r17092@comcast.net)

The savings from efficiency can go toward the workers in pay and benefits instead of being wasteful thinking your saving when it fact you are not.

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Laurence Hamlin (revlgh@hotmail.com)

I support the commercial waste zone system.

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: William Dalley (bill_shar819@msn.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Rick Pendleton (racefan_45@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Chuck Stiles (cstiles@teamster.org)

Having worked in NYC with Teamsters Local 813 I was absolutely shocked to see how the Sham Independent Unions have decimated the once good Middle Class jobs into inferior low wage jobs with little or no benefits. I represent Sanitation workers in parts of the rural South who have much better wages and benefits than anything that these Sham Unions offer. These Sham Unions have not only robbed these hard working families at these companies but they have also robbed the taxpayers of New York due to the fact that many of these workers are forced into taking SNAP, WIC, Subsidized housing and healthcare. The citizens of NYC have the Right to expect safe and professional drivers and law abiding Carters on the City streets.

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Shawn Wise (bo07504@aol.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Rich Curry (bigrich817@aol.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: William Higgins (centurioninvest@hotmail.com)

Support the teamsters.

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: William Brannock (Fiftybills@aol.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Rafal Dobrowolski (rafdobrowolski@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Maria Perez (mperez@teamsterslocal97.org)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Nathaniel Williams Jr. (nwilliamsjr@aol.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Susan Charles (suscharles@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Victor Fuentes (fantasia12001@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Jon Bedillion (jdb585@comcast.net)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Diana Smith (dianasmith810@yahoo.com)

We need to protect our workers and our environment. Why don't the owners work with the the people to work with us, not against for future generations. Your children and our children's children. Be a part of this transition and do the right thing! You will be better off for it. Don't you think? Make the right choice! You're either for us or against us....for us or against us! Think about it!

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Mary L. (mar3336@citynet.net)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Manuel Cabrera (gabsam2@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Nickolas Kahn (airwolf0623@gmail.com)

We need to organize to stop these companies from abusing workers rights. Also to have safe working conditions.

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Joe Mazza (mazzaracing@gmail.com)

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From: Andrew Gallo (dngrzne@optonline.net)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Stacy Catalano (stacycatalano@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Jose Lopez (jjvidal03@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Gary Niemiec (garyhabs33@gmail.com)

Take care of these hard workers that keep your city clean.

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From: Henry Drobbin (Hdrobbin@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Merry Tucker (MerryTucker@msn.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Russell Hayes (Hayesclan3@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Shirley Shirron (ShirronElkton@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Luis Freire (lufre5@comcast.net)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Marian Novak (mlnjc43@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Kathleen van Voorhees (kathleenvanvoorhees@gmail.com)

Long past time for NYC to have a zoned collection system for commercial waste.

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Gordon Tyrer (gtyrer@optonline.net)

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Under the current system, commercial waste carters – nearly 100 companies – crisscross the city every night on long and inefficient routes, collecting trash from offices, restaurants, and other businesses. The industry is plagued by companies with poor working conditions, polluting trucks, low recycling rates, and a high number of fatal crashes. Most of the industry's trash facilities are located in communities of color.

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Udo Schmidt-Sinns (usdoschmisi@gmail.com)

Those working conditions look like modern day slavery, inhumane to say the least.

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Donald Macomber (dmaco09@me.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: I.B.T. Local 600 Golden Age Retirees Club (rmgsr@att.net)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Joseph Vassau (jjvass55@gmail.com)

I support exclusive waste zones and the TEAMSTERS!

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Bright Limm (bdlimm@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Daniel C Levler (dlevler@scame.org)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Mike Smythe (poppop8101@comcast.net)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Ken Dickey Sr (seaog24.kds@gmail.com)

Union workers do it safer and better. Go Union!

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Edmund Gigg (greggigg@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Gordon Rawlings (gordonr1@verizon.net)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Jim Destaphano (TIMBER1040@VERIZON.NET)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Gary Randolph (nadman78@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Christine Castellano (cast8367@aol.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Raymond Bacchiocchi (teller702@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Kevin Gorry (KGorry@RocketMail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Panayotis Pertsas (greek226@aol.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Sandy Franks (s-franks@sbcglobal.net)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Frank Bancone (fbancone@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Alan Souza (alsfitness@aol.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Karlan Bean (karlanwbean@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Joe Weidman (weidmanj@bellsouth.net)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Ben R (flacoo644.bc@gmail.com)

People should not hire company's like this and these company's are low balling the workers and don't care about them and the environment, they need change.

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Horiol Charles (horiolcharles1203@aol.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Patrick O'Regan (opaddymon@gmail.com)

Time for this city (N.Y.C.) to give the sanitation industry one standard of competitive bidding with the improvisation of a uniform safety standards, proper industry training & a stop to deaths by companies that hire cheap labor & abuse those with substandard equipment & abuse of excessive man hours.

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Richard Farino (rpfhun@msn.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Robert Green (green7174@sbcglobal.net)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Jen Chantrtanapichate (jmc9488@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Caily Herbert (cherbert12@gmail.com)

Environmental racism is pervasive in this country and this city in particular. Proactive steps must be taken expediently to redistribute our waste zones equitably.

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Maggie Calmes (maggie.calmes@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: James Jacob (jim_t_jake@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Henry Flax (henry.flax@flax.org)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Patricia Lopez (patricia.lopez.ramos@gmail.com)

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From: Margarita Montero (monteronorton@comcast.net)

Keep in mind that we are all together in this Temporary Life. Feel compassion for your fellow Brothers & Sisters and our wild animals. Don't you like to see the natural view of our Mother Nature. Protect the rivers, lakes and Oceans. Some People do not have clean water in their homes.

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Jackie Stolfi (jacqueline4sight@aol.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Ramon Sandoval (ramsand67@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Mary Eiben (eibenmf@yahoo.com)

Come on, NYC! You're supposed to be a leader in safeguarding your citizens. Transform, don't trash!

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Paul Grohman (pmgrohman@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Erwin Espinoza (er.mailbox.win@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Dorothee Pierrard (dorothee.pierrard@hotmail.fr)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Anthony Trotta (mabstoa13354@aol.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Dale Millar (hevyduty@comcast.net)

Solidarity! The dignity of work!

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Louis Malizia (Lmalizia@teamster.org)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Lucye Millerand (lmillerand@ura-aft.org)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Jenny Ravitz (jenny.ravitz@gmail.com)

Protect our workers!

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Duane Graham (pizon50@comcast.net)

MY experience in the Freight Industry is Mgt never listens to employee ideas, they think they're much smarter than the worker on the street.

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Raymond Morales (rlm3bk@gmail.com)

I am in favor of the Waste zero system proposed by the Teamsters.

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: David Ferrante (felix11376@aol.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Jim Connor (gojamconzgo@gmail.com)

Stop the exploitation of workers!

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Michael Davin (Mikebucs211@icloud.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Michael Spinelli (mspin553@verizon.net)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Joel Castillo (jcastillosr2@comcast.net)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Paul Bakker (paul.bakker@ymail.vom)

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From: Sharon Barnes (sharonlb88@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Dennis Govig (dgovig@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Demos Demopoulos (demo553@verizon.net)

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From: Michael Dolan (mdolan@teamster.org)

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From: Pamela Gaskill (pgkjoy@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Justin Camacho (jcamacho17@gmail.com)

Action needs to be taken to treat everyone with equal value and respect.

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Michael DeCarlo (mادتwo69@sbcglobal.net)

Having worked for a local municipality in CT, i know first hand how difficult and dangerous trash and recycling jobs are! Even with the best equipment, pay, healthcare and a pension, i left the field. It's a "No Brainer " if the study is even half correct, less traffic, pollution, more safety and lower cost. Those are surely points that bipartisan law makers should agree on. For too long, organized crime has been controlling a large part of refuse collection in the Tri- state area's. It's time to put working people and our environment ahead of GREED! Thank you for the opportunity to express my opinion.

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From: Mark Powers (markwpowers@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Joseph Saroli (DRIVENY@aol.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Matthew Fazakas (mtfazakas@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Joy Cardyn (joycardyn@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Tom Fallon (inwood207@aol.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Rose Murphy (newyorkrose@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Jessica Treybick (Jessicatreybick@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Oluwasheyi Oluwabiyi (daniel_ogunbiyi@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Joann Lo (joann@foodchainworkers.org)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: John Palumbo (jppal2457@aol.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Shaun Martinez (shaunmmartinez@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Robert Schuster (schusterrw@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Gregory Kerwood (greg@sodapoprecords.net)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Daniel Sannik (ugottreed@optonline.net)

Teamsters Local 282 Union strong

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Fred Nye (fnye@teamster.org)

This is an outrage!!!

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Eugene Flannery (eflannery@cinci.rr.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Immanuel Pettigrew (pettigrew.i@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Nelson Nunez (nunez1205@verizon.net)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Katherine Fitzer (kfitzer@legal-aid.org)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Mary L. (mar3356@citynet.net)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: James Mikkelaen (jmikkelsen@juno.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Lori Rizzitano (lori@teamsterslocal1205.org)

No human should be treated like Mouctar Diallo was treated ever!

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Thomas Sharratt (Tscarab96@aol.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: John Pannone (jsk40oz@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Gary Gaasland (themilkman2@bis.midco.net)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Steve Kitni (steve@msn.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Mentor Guanoluisa (guanoluisa.m@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Victor Ryder (bigguyvr@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Tammy Munoz (miraclex2@msn.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Angel Martinez (amartinezlocal812@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Jamaka Petzak (jmuhjacat@att.net)

The hardworking members of the cartage industry ensure that our streets are clean and our municipal sanitation standards are kept high. They deserve fair and just working conditions, and we all deserve exclusive commercial waste zone system implementation.

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Francisco Lopez (flopez@ibtlocal210.org)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Diana McNair (dmcn1970@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Danny Montalvo (montalvod55@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Michael Cannon (mcannon3@optonline.net)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Jason Boyer (jasonboyer211979@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Joseph Vitta (Jgv1025@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: William Kinsella (dollarbill2224@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Joseph Trainor (jtrainor32@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Jason Schulman (jschulman@jjay.cuny.edu)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Scott Penwell (amp2@prodigy.net)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Gregory Butler (gregoryabutler@aol.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: David Tully (dtully@teamsters223.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Charles S. Fisher (charlesfisher740@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Darryl McKenzie (mckenzie745@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Robert Nelson (rsngc@outlook.com)

Honor the extraordinary strength of the sanitation workers we depend on every day by ensuring they have decent conditions, reasonable hours, and good pay. Exclusive commercial zones are the way to get there!

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Plinio Cruz-Alvarez (plinioalvarezcruz@yahoo.com)

We have to do what is right for the city and its workers!

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Pat Blackwell-Marchant (patmarchant@comcast.net)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Ricardo Rosaly (ricardorosaly@aol.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: John Julian (julian1269@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: David Levin (DAVIDLEVIN8@GMAIL.COM)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Victor Aviles (victoraviles85@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Gerard Iovine (jerryio58@yahoo.com)

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From: Georgene Lewis (georgenellewis@gmail.com)

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From: Jamie Holligan (JHolligan@hotmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Caryl Robalino (Clob78@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Christopher. O Graham (chrisgraham292@gmail.com)

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From: William Andre (wouwoule@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Michael DeCrescenzo (deek5971@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Bernard Flores (Bflores2382@gmail.com)

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From: Orlando Lindsay (orlindsay@gmail.com)

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From: Lasheena Austin (lasheena35@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Michael Rousselin (lesane_crooks44@yahoo.com)

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From: Jean Byron (fredybyron@icloud.com)

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From: Joel Chase (anoinkedkid2003@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Calvin Lawson (lawson1973@optonline.net)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Dwight Johnston (Djohnston1122@gmail.com)

As a union member we all should stand together and show our support for this cause, in unity there is strength.

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From: James Sullivan (redcomet926@gmail.com)

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From: Linda Sullivan (lmsk507@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Leonardo Lavigat (ladylover037@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Derek Kee (718mdk@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Vaios Efstratios Ayfantis (veayfantis@aim.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Robert Kruska Jr (robertkruskajr@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Steven Noethiger (tazzman2965@optonline.net)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: John Ward (peepee1013@aol.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Jaime Velez (jaime_vez7@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Felix Perez camacho (ing.felix26@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Scott Damone (s.damone@teamsterslocal804.org)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Stephen John (stephenjohn26@gmail.com)

United we stand

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Larry Remy (mayhm13@aol.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Ysmael Bonheur (ezduzit259@gmail.com)

Regardless of Origin & Race. We're all Equal upon this world & should be treated with Dignity & Respect.

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Charles Jordan (curbsein@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: George Pachas (gpachas82@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Richard Pardo (mc_fraze@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Joseph Indelicato (brightlotus99@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Leo Baranovsky (tuganbar@mindspring.com)

Please consider as if your own son or daughter is employed by one of the NYC private sanitation carting companies.

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Brian Hill (brian_hill5969@sbcglobal.net)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Andres Maturana (gandres40@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: John Kadletz (jacsak83@comcast.net)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Amy Goldstein (agoldstein123456@gmail.com)

Respect the Sanitation workers , stop this war on the workers!!!! Work together!!!

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Shawn Ocarroll (exfurious@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Stephanie Perez (stephanieperez925@icloud.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: David Rodriguez (dsrod4@gmail.com)

Show these people the respect and dignity they deserve for doing a job no everyday person wants to do.

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Yuriy Kupetsky (ykupetsky33@yahoo.com)

Yes I support.

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Terry Lambert (tlambert23@aol.com)

We already have the leader of the country not honoring Unions with his more than 50 case at the Dept. Of Labor. Now one of the richest city in the world working people off the books is just sickening. They say they want to help the middle class, but they continue to attack labor Unions who is doing more for the middle class than any Politician!!!

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: William Londino (traponone@aol.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: J. Vazquez (jvazquez109@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Jesus Rodriguez (jguitar29@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Richard Soto (gerichrisbri@hotmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Keshia Inniss (kinniss85@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: John Pisacone (jpisacone@aol.com)

The fight continues

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Keith Paul (baylandyank@aol.com)

We have to unite

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Victor Sosa (victor789874@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Mark Mignone (markbsa93@aol.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: John Wulff (lonewolfny1@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Lisa Kuriga (lkuriga@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Terry Poplawski (tpop@pacific.net)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Giovanni Correa (giocorrea10@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Julio Baez (jayjay86.jb@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Savu Ciobanu (savuciobanu@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: John Tavitian (johntavitian@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Arlene Forward (aforward@optonline.net)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Merouane Haffar (mim01ozizo@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Kurt Youngberg (upsstretch@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Gareth Reid (GARETHGMONEY1@GMAIL.COM)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Bonnie Nelson (brnjj1@gmail.com)

I live on a commercial street and would definitely welcome this plan which would directly affect me by reducing pollution. In fact, I see only positive outcomes for exclusive waste zones and can't understand why NYC wouldn't want to make this move.

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Jeff Hester (Tjcmnsns@aol.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Frank Martinez (auntyclaw@verizon.net)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Connie Oloughlin (connie.oloughlin@yahoo.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Philip Caronna (pgc65@hotmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Leanne Tory-Murphy (leanne@alignny.org)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Joe Karl (joepepsi28@optonline.net)

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From: Kenneth Hoskey (kenhoskey@gmail.com)

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From: Jane Thorkelson (jthork@aol.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Jairo Reyes (jairoreyes1117@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: harris cabrera (hcabrera21@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Maria DiPasquale (mariaedipasquale@gmail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Avelino Montalvo (avelinomontalvo@me.com)

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From: Daxon Blair (blairdaxon@ymail.com)

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Public Comment on Commercial Waste Zone Draft Generic Environmental Impact Statement
From: Jeanne Costello (jeantc63@hotmail.com)

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From: Ralph Turner (ralphieturnerjr@gmail.com)

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From: Jonathan Vargas (jayvargas0916@icloud.com)

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From: Adam Gins (mrkimchies@aol.com)

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From: Steven Hernandez (stevenroy91@gmail.com)

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From: Marlon Boston (kendray75@gmail.com)

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An exclusive commercial waste zone system has already been implemented in leading green cities like San Francisco and Seattle. DSNY's study found that exclusive commercial waste zones would reduce private garbage truck traffic by 60% across the city and is the most cost-effective way to collect commercial waste.

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From: Tom Washington (ponyned@aol.com)

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From: John Baietto (job4561@yahoo.com)

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From: Jennifer Vieira (jusey@aol.com)

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From: Mark Froemke (mfroemke1@aol.com)

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From: Victor Castellano (vcast553@verizon.net)

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From: Raul Borrero (rborrero70@gmail.com)

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From: Cristian Lazar (crislaz22@gmail.com)

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NYC - Department of Sanitation Public Hearing
March 11, 2019

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ENVIRONMENTAL REVIEW
OF PROPOSED
NY COMMERCIAL WASTE ZONE
HEARING

-----X

Monday, March 11, 2019

9:09 A.M.

125 Worth Street, 2nd Floor Auditorium
New York, NY 10013

1
2 MR. BRAUTIGAM: Okay. I think we're
3 going to get started. Good morning,
4 everyone. I want to thank you all for
5 coming to this morning's hearing on the
6 Environmental Review for the proposed
7 Commercial Waste Zone Program for the
8 State of New York. Today is March 11,
9 2019. It's now 9:08. And I am Steve
10 Brautigam, Assistant Commissioner for
11 the New York City Department of
12 Sanitation Bureau of Legal Affairs. And
13 we are the lead agency that's overseeing
14 the environmental review of this
15 proposed program. This hearing is
16 required, pursuant to the New York State
17 Environmental Quality and Review Act,
18 known as SEQRA, and the City
19 Environmental Quality Review Procedure
20 to SEQRA.

21 So the intent of this meeting is to
22 give the public with -- an opportunity
23 to comment on a document called a "Draft
24 Generic Environmental Impact Statement"
25 that has been prepared and released.

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You can get it from our website. And we have noticed this public hearing in the City record, and the Environmental Notice Bulletin and in -- with public interest advertisements in the -- notices in the New York Post, the World Journal News, and El Dario.

So this Draft Generic Environmental Impact Statement, as I mentioned, is available for download on our website. You can also inspect a copy of it at the table, in the entry area there. And there's also a final scope of work that we follow in preparing this document.

And some of you were at the public meeting, in which we had public comments on the draft scope of work for that document. We have addressed the comments that we received and was responsive to made comments. And that's also available for inspection, if you'd like, on the end of the table or you can get it from our website.

So let's briefly go through this

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morning's program.

We're going to first take a few minutes to get some information on the Environmental Review process itself. After that, we'll give you an introduction to a Commercial Waste Zone Program that's being proposed.

Then, we'll have a short presentation on the findings of this Draft Generic Environmental Impact Statement, and then I'll review the procedures for accepting and giving comments on it this morning. And finally, we'll open it up to you to get your comments on that document.

So this is not a hearing on the pros or cons of the proposal itself, but it's really on the environmental review that we have prepared for the public, and public officials to consider when they have their public process.

And there will be hearings down the road when elected -- the City Council is considering the actual legislation to

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implement this program. So with that,
I'll move on.

So the environmental review process,
as I mentioned, it's done pursuant to
the state law and City rules. When
you're doing an environmental review,
you consider approximately 19 different
areas, and those range from land use and
public policy. Here, we don't have any
actual physical project. But
socioeconomic impacts, impacts on the
industry, air quality, transportation,
these are some of the categories that we
need to consider.

This is a broad regulatory change,
and that's why we used what's called a
draft -- a "generic approach", because
it's affecting such a broad area. And
so this environmental review is then
used by the decision-making
authorities -- the City Council and the
mayor.

It doesn't determine what the
outcome of that decision process will

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be, but it informs that process. And there is the expectation that if you find significant, adverse environmental impact, that you will do your best to avoid or minimize the significant, adverse impact to the maximum extent practicable, consistent with social, economic and other objectives.

This -- where we are in the process right now is: We have conducted and completed the public scoping process, and that resulted in the release of the final scoping document. And as I mentioned, the public had a chance to comment on that. We had a public meeting on December 11, 2018, and we extended the Public Comment Period on that draft scope of work through January 4, 2019.

Today, we want to hear comments on the document we have not produced, which is: Are these areas we have identified for analysis? Do they need to be changed? Did we miss some information

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here? Are there other areas that we ought to be considering for analysis? Is there any other information that you think we ought to be considering here? And similar types of feedback.

So we will then take your comments on that Draft Generic Environmental Impact Statement and incorporate them as appropriate into the final document, and our response to the public comments that we received and make that part of the final document, as well.

So today, we're not going to individually answer comments that you make. We're going to take them down. We have a court reporter here for that purpose, so we can get it right.

And I'd like to remind you that you can submit written comments until the end of the Public Comment Period. So if any of you have written comments, you can submit them today, as well. And we take oral and written comments. The Public Comment Period will be ending on

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March 25th at 5:00 p.m., and you can submit comments in any language, by e-mail or regular mail. They will all be given equal weight. Anything that's given here, or received up to the end of the Public Comment Period will be given equal weight.

So with that, let's turn to the second part of the program, and that is: I'd like to introduce to you Peter Glus from the consulting firm Arcadis, who will walk you through the proposed Commercial Waste Zone Program.

Peter.

MR. GLUS: Good morning. The City of New York is implementing a plan and contract work process to develop a zoned commercial waste system called the CWZ Program throughout the City's five boroughs.

The CWZ Program will develop geographic zones within which a limited number of carters will be authorized to operate in each zone. The CWZ Program

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will advance the City's efforts to increase commercial recycling, reduce car and truck traffic and associated air noise and greenhouse gas emissions, and improve carting industry operational standards.

Today's commercial waste system achieves its basic goals of collecting and handling the City's commercial waste, but the competitive market has resulted in inefficiencies with overlapping carting routes and extra truck traffic, resulting in increased risk to pedestrian safety, traffic congestion, air and noise pollution, road wear and increased use of fossil fuels and greenhouse gas emissions, including climate change.

Further, compliance with the City's safety equipment and training requirements and necessary equipment means are often not enforceable under the current system. And contracts and pricing are not transparent to

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customers.

Since July 2017, more than 150 different stakeholders have been consulted in determining the program goals, implementation strategies and the necessary requirements for the initial carter contracts within the CWZ Program.

Going forward, the City and project teams expect to continue to work with the stakeholders during public review and implementation of the program.

So what's proposed?

The CWZ Program will create zones, assigning only a certain number of carters to each zone, thereby minimizing route inefficiencies and overall truck traffic and overall environmental impacts from the industry.

Under the CWZ Program, private carters will competitively bid for rights to serve businesses within geographic collection zones. Carters that win those contracts will be obligated to meet certain contractual

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requirements aligned with the City's program goals and objectives.

For customers, the CWZ Program will standardize the carter contract process, by requiring written-service agreements between carters and customers, and making the present structure more transparent. Customers will continue to be able to choose carters that are awarded service in the collection zone, and would be able to switch to another carter at their discretion.

So what is the benefits of this program?

The CWZ Program would be -- would build on current regulatory systems with a contract-based system, where carters are subject to clear requirements stated in the contracts. The contracts awarded to selected carters will be long term, providing for transparent-and-fair pricing and customer-service mechanisms, require approved environmental performance and ensure compliance with

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and enforce the above-existing and new requirements. Non-compliance could result in monetary penalties or loss of a contract.

Overall, the CWZ Program will provide stability to the commercial waste industry by providing carters with predictable business and promoting long-term investments in recycling services and cleaning trucks.

The CWZ Program would likely be implemented in multiple steps. The competitive solicitation process would be expected to begin in 2020. RFP's will be released for all zones, and all proposals will be reviewed and awarded concurrently.

Once all contract agreements are executed, customer transition would begin at the end of 2021 and could take up to two years to be complete by 2023 or early 2024.

DSNY would continue to serve as the project manager for the CWZ Program, and

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in this capacity, would oversee the competitive solicitation and negotiation for each zone's contract between the City and the carter for the right to collect waste, and the overall transition to the commercial waste system.

So what does the CWZ Program look like?

Based on consideration of stakeholder feedback, the chosen proposed zone design consists of 20 non-exclusive zones with three to five carters allowed to operate within each zone. The design is chosen partly to maintain competition, fair pricing and profitability for carters and, thus, minimize market disruption. Customer businesses will be able to choose from a number of carters, allowing prices to be competitive and potentially maintain them. Carters will be able to protect profitability through competitive pricing and maintain their customer

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base.

So now that you have heard the description of the project, I'd like to introduce Linh Do, who is the Senior Vice President at AKRF, and she's going to highlight the key findings of the draft GEIS.

MS. DO: Good morning. As previously mentioned, the draft GEIS was released for public review on February 22, 2019.

How do we determine potential effects that may be caused by the CWZ Program?

To do this, we look at three scenarios.

First is, the existing conditions are determined. And these are things that we can measure and count.

Second, we determine the build year, in which the program is anticipated to be complete and in operation. For the CWZ programs, the build year is anticipated to be 2024. That's when it

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will be fully implemented.

And we look at those conditions in the year if the program is not implemented. To do that, we assume future commercial waste removal operations will be similar to existing conditions, but that they would operate under some additional local law compliance. This is referred to as the No-Action Scenario.

Third, conditions in the build year with the CWZ Program are estimated.

The with-action scenario.

It is a difference between no-action and the with-action scenarios that indicates the effectiveness of the CWZ Program. This is what is measured to determine whether the program can be expected to cause adverse environmental effects, and how large or how small these effects would be.

As the -- the CWZ Program is generic, the Draft Generic EIS studied representative types of commercial

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clusters and corridors within -- within New York City, and included an analysis of the program's likely effects on its environmental setting.

You see that as -- noted as probable impacts of the proposed project; the expected year of the full program implementation under the analysis year of 2024.

Three representative neighborhood case-study areas were selected as typology, to provide a more detailed and contextual analysis of the potential benefits and adverse impacts of the program in several New York City communities.

The first one, the Midtown Manhattan central business district. This was selected as a representative of high density EDD with commercial waste producers, ranging from small-scale retail and restaurants and large offices. The area that includes large destination retail, as well as major

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entertainment destinations.

The second one is the Flatbush Nostrand Junction. It's medium density. It represents mix-used neighborhood corridor, commercial cluster and serves as a major retail and transportation center in Central Brooklyn.

Commercial retail within this district includes small businesses, and in recent years, larger national chain stores, including those within the Junction Mall development. In addition, the Junction includes very small offices and other commercial spaces, adding to the mix of businesses found within the area.

And lastly, the College Point area, which represents lower-density retail. This is case study that are not centralized within a defined cluster or corridor, but are distributed throughout the neighborhood and includes small businesses as restaurants and local retail. However, this district also

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includes larger commercial waste producers, including Pepsi-Cola Bottling plant, New York Times printing facility and other large commercial retail centers.

As Steven had previously noted, the draft GEIS assesses potential impacts for the 2024 analysis year, when the program's expected to be fully implemented.

Of the 19 technical areas, there were certain technical areas for analysis that would not be affected by the program, and were not included for detail assessment in this Draft GEIS. They included: Community facilities, open space, shower, historic and cultural resources, urban design and visual resources, natural resources, hazardous material, water and sewer, energy and construction.

Listed on the slide behind me are the technical areas that were assessed. Some of which I will -- will be summary

1
2 highlights in the next few slides. They
3 include socioeconomic, solid waste, as
4 well as the related effects on
5 transportation, air quality, greenhouse
6 gas, noise and alternatives.

7 Further, a chapter on the transition
8 period was also provided based on
9 feedback during the public scoping
10 process.

11 In the socioeconomic conditions
12 chapter, we studied the potential
13 effects of the program on industry
14 viability and to commercial businesses
15 using carting services.

16 Under the program, potential changes
17 from commercial carting industry
18 operational talks would not jeopardize
19 viability of the industry, or the
20 ability to provide citywide carting
21 services at a reasonable cost to
22 commercial businesses.

23 We also noted, as a result of
24 efficiencies associated with the zone
25 routing, including the reduction in

1
2 routes necessary to collect an equal
3 amount of waste, the total operational
4 expense to be incurred by the carting
5 industry are anticipated to decrease,
6 despite the additional equipment and
7 administrative costs associate with the
8 CWZ Program.

9 While the program has a potential to
10 reduce the total number of commercial
11 carters operating within the city,
12 carters that fail to win zone contracts
13 may transition into the collection of
14 non-CWZ waste streams, such as
15 construction and demolition, and
16 engaging other agreements with
17 subcontracts to support the metropolitan
18 area outside of New York City, or remove
19 themselves from the industry.

20 Despite the potential for some
21 carters to close, the remaining
22 commercial carters that continue to
23 operate in the CWZ Program are
24 anticipated to continue to provide
25 effective waste collection services

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across the city.

Businesses that pay for commercial carting services would likely benefit from the program, as the program would not result in a substantial increase to the expenses associated with the commercial waste collection. Customers, regardless of the industry center or the location, would likely receive improved services, including free waste assessment, and access to a dedicated call center at a competitive rate as a result of the program.

As such, the CWZ Program is not anticipated to result in significant adverse affects on the commercial waste carting industry, or to the customers of commercial waste carters.

On the topic of the Solid Waste Management Plan, the draft GEIS studies potential effects of the program on the City's solid waste management system, as well as reviews the CWZ program's consistency with the City's Solid Waste

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Management Plan known as the SWMP. The program is not expected to increase the volume of waste being produced or collected, but result in a redistribution of how that waste would be collected, and by which carter it would be collected.

With more recycling and organic material being separated under the program, less waste would be sent to landfills, saving resources and energy consistent with the City's sustainability and recycling goals.

The program would also support the SWMP goals of reducing truck traffic, thereby, noise and air quality emissions and enhance pedestrian safety while still providing sufficient capacity to collect the commercial waste generated within New York City.

Therefore, the program would not result in significant, adverse impacts to solid waste sanitation services and would be consistent with SWMP.

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2 The transportation chapter of the
3 GEIS studies the potential effects of
4 the program on the City's transportation
5 systems. Under the program, the number
6 and type of customers would be expected
7 to remain the same as under the
8 no-action condition. However, the
9 program would limit the number of
10 carters within a geographic zone, which
11 would result in increased efficiency in
12 waste collection routes, such as that
13 associated Vehicle Miles Traveled, or
14 VMT. And the overall carter truck
15 traffic would decrease.

16 It is anticipated that overall,
17 approximately 275 less trucks would be
18 required to effectively and efficiently
19 collect commercial waste within New York
20 City.

21 The program is expected to reduce
22 citywide commercial waste carter truck
23 VMT's by approximately 50 percent,
24 compared to the no-action condition, and
25 by 47 to 60 percent within the case

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study areas. Therefore, detailed traffic analysis were not warranted, and the CWZ Program is not anticipated to result in any significant, adverse transportation impacts.

Alternative. Although the draft GEIS did not identify significant, adverse impact from the program itself, with respect to any of the SEQRA environmental areas, two alternatives to the program were considered in the EIS. That is, the No Action Alternative and the Exclusive Zone Alternative.

The No Action Alternative predicts that environmental conditions would exist -- that would exist if the program was not implemented. Under the No Action Alternative, waste -- commercial waste industry would remain unchanged, with the exception of some regulatory changes that the industry already expected to implement by 2024.

The No Action Alternative would not result in significant impacts to land

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use and public policy, socioeconomic conditions, solid waste, transportation, air quality, noise or greenhouse gas.

However, many of the benefits of the program, which include advancing the City's efforts to increase commercial recycling, reducing carter truck-traffic and associated air quality and noise, and improving industry operational standards and establishing mechanisms to enforce those regulations would not be realized.

Under the No Action Alternative, the carter operational expenses, and administrative costs are expected to increase as a result of increased diversion goals. The retrofitting of trucks to comply with new emission standards, and the installation of side guards on all commercial carter trucks. It would result in a higher total number of trucks in the program, and, therefore, there would be no routing efficiencies and additional trucks would

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be required to collect all waste streams.

Under the exclusive zone alternative, a single carter would be awarded the exclusive right to provide collection services within each designated service zone.

As with the CWZ Program, the Exclusive Zone Alternative would not result in significant, adverse impacts. And it is anticipated to further lower operational costs of carters, and reduce employment compared to the program due to better routing efficiencies.

However, the Exclusive Zone Alternative would have drawbacks in comparison to the program. With respect to the anticipated price increases to customers, as a function of reduced competition, there will be greater risk of carter solvency within a restrictive market, and increased risk of inability the exclusive carter to meet the customer's needs.

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The elimination of competition within the commercial waste zones has the potential to increase costs of commercial carting services on customers, and could lead to a reduction in customer service and satisfaction due to single-service providers.

Further, implementing the Exclusive Zone Alternative has the potential to pose a substantial logistical challenge, as few carters have the capacity to exclusively service a single zone. A larger number of customers will be required to change service providers in the transition period, and potential future service issues could develop if a single carter is unable to successfully provide the necessary services. Therefore, the CWZ Program remains a preferred alternative.

And lastly, the Draft GEIS looks at the transition period. As other cities around the United States have adopted similar programs to our programs being

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proposed here, the City has been able to review their transition and implementation plans, adopt best practices, and implement lessons learned from their peer city.

These best practices and lessons learned have been incorporated into the planning, transition and implementation of the CWZ Program to minimize adverse effects to the City during this transition period.

It is anticipated that during the transition period, carter-awarded contracts would have additional operational expenses and administrative costs to cover activities required by the program.

Existing New York City carters, in anticipation of the competitive bidding process, may choose to consolidate companies or remove themselves from the market.

During the transition period, it is also expected that there would be some

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transition of the labor force to shift employees from carters that did not win an award to awarded carters. The SN1 provides aid during this labor transition process.

Carters will also likely need to establish new routes to conform to zone boundaries. Further, any carters that are not awarded a contract or a zone may continue to service customers in that zone until the end of the transition period.

The combination of carters continuing to service customers through the transition period with new intermediate routes operated during this period would have the potential to result in temporary increases in the number of commercial waste collection trucks and minor increases to VMT.

However, these minor increases in trucks and VMT's during this period would rapidly be offset by reductions in VMT's, as the full program is rolled

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out, and are not expected to result in significant, adverse effects to transportation.

These temporary increases would be eliminated after the transition period ends. Overall, activities associated with the transition period are not expected to result in significant adverse impacts to land use and zoning public policy, socioeconomic conditions, solid waste, transportation and their related air quality and noise issues.

Steve, may I have -- Steve is going to go through the next phase of the scope.

MR. BRAUTIGAM: Thank you, Lynn. Okay. So that brings us to the most important part of this morning's hearing, which is getting comments from you. So we'll just briefly go over the procedures we'll use this morning.

We want to do it in an orderly fashion, so that we have a chance for everybody to speak on the Draft Generic

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Impact Statement who wants to. And as I mentioned, we have a court reporter here taking down this morning's comments.

Folks who want to speak will be heard generally in the sign-up order. You should -- if you want to speak, get a card from the table at the entrance and fill it out. I will call on people in the following order first: Any elected officials who are here or members of their staff; then, any representatives of City or State agencies or community board members and their representatives; and then, members of the general public.

So I should also say that there will be a second public hearing on March 14th at 6:00 p.m., in this same room. So if you know of others who would like to comment and hear a similar presentation, please pass the word on that.

You can send comments to our contact person for this environmental review, Abas Braimah. The information is on the

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screen there. But I'll just read it for the record: New York City Department of Sanitation, Bureau of Legal Affairs, 125 Worth Street, Room 708, New York, New York 10013.

As I mentioned, in addition to oral comments, if you have written comments, you can bring them in or you can send them to us. And if we get them by 5:00 p.m. on March 25th, we'll have them as part of the record.

So with that, let me first ask: Are there any representatives of public officials who would like to speak?

I see none. Let me ask: Are there any representatives of City or State agencies or Community Boards that would like to speak?

I see none. And let us go to the list of speakers that I have here. The first one -- I'm going to call first in three orders, so you can get ready to come up. Please limit your comments to three minutes each, so that we each have

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a chance to speak. And let's keep the whole process orderly.

So the first person I have listed is William Crater. I apologize if I'm not pronouncing it correctly. You can correct the pronunciation when you speak. Followed by Sean Campbell and Phil Vos.

If you can come on up here and use the microphone.

MR. CRATER: Good morning. My name is William Crater, I am a member of Teamsters Local 813. I've been in this industry for over 30 years. I've seen a lot. We are here today to speak in favor of the commercial waste zones, and I think that's a great idea.

I remember a time when the private sanitation workers and the City sanitation workers were on the same level. Our contracts were mostly the same, and in some ways, the private guys had it better. Not so much anymore.

Now I see my brothers in this

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industry, as I talk to them, doing hundreds upon hundreds of stops a night without a decent paycheck, with unsafe trucks, no gloves, sneakers on -- stuff that I see that, you know, I don't think is right.

I believe if you have one carter in each zone of the city, the private sanitation industry can work just as well as the Department of Sanitation, and just as safe. I believe one street, one truck is safer -- safer for the pedestrians, more affordable for the customers. And in my opinion, better for the environment as a whole.

I just want to say thank you for reforming this industry.

MR. BRAUTIGAM: Mr. Campbell.

MR. CAMPBELL: Good morning. My name is Sean Campbell. I'm the president and principal officer of Teamsters Local 813. Big problems call for big solutions, and New York's private carters have been big problems.

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Just last week, we got news that Five Star Carters' corporate office was raided by federal and city authorities. Accountability for the company and others like it can't come soon enough.

Many of the City's private carters endanger their workers and other New Yorkers on a nightly basis. When your business model is to send out workers with little to no safety training, without safety equipment, on trucks with malfunctioning brakes, for shifts of over 12 hours is a recipe for disaster. It's a recipe for crashes that will injure, or kill workers or other people on the road.

Too many workers, pedestrians cyclists and drivers have died at the hands of this industry. Thankfully, the GEIS shows that there is a solution that solves these problems: Exclusive commercial waste zones. Exclusive zones will end the practice on routes that run through multiple boroughs for dozens and

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dozens and dozens of stops every night. One truck will stop at every business on a block. It will reduce garbage truck traffic by 60 percent, and the traffic we will have will be slower and safer.

And the beauty of this policy is that they are making the industry safer, while also saving everyone money because you don't waste so much time, money on diesel fuel and wear-and-tear on your trucks.

The DSNY 7535 that costs will be 4 percent lower than with the exclusive zones. That savings can go to lower prices for customers or better wages for workers. It's money that can go to the City, to State of the art facilities to increase our recycling rate.

Through a competitive bid with each exclusive zone, which will prioritize fair practices, alongside labor and environmental protection, every business will finally get a fair and transparent price.

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Gone will be the days of carters charging one rate to big businesses on Park Avenue, and charging 40 percent more to small businesses on Bushwick Avenue or Queens Boulevard.

We need exclusive zones to hold all carters to the same high standard. There are carters that are trying to do the right thing. Their workers are Teamsters. They pay fair wages, they maintain their trucks, but they can't compete with these companies who used untrained workers and pay below minimum wage.

Now it's time to embrace the big and bold solutions that the industry needs. This is why we encourage the City Council to pass an exclusive zone bill, so that we can finally clean up this industry. Thank you.

MR. VOS: Good morning. My name is Phil Vos, I'm the program director of Energy Vision, a New York City based environmental 501.c(3), since 2007.

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Energy Vision has been studying alternative fuels for heavy vehicles, and we welcome the opportunity to comment on the Draft General Environmental Impact Statement.

According to the Draft Impact Statement, contracts awarded under the zone system will include incentives for improved environmental performance, such as the conversion of collection fleets, clean technologies, like electric or compressed natural gas.

Energy Vision will wholeheartedly applaud this inclusion, and we call the city council and the administration now to craft and pass legislation that will put cleaner commercial waste collection vehicles on our streets.

We applaud the inclusion, because commercial waste zone goals of reducing air pollution and greenhouse gas emissions and prioritizing investment in clean, modern, sustainable collection fleets go hand-in-hand.

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2 The type of pollution and emissions
3 solely by reducing VMT's would be to do
4 only part of the job. Cleaner trucks
5 also have a crucial role to play. The
6 Draft Impact Statement estimates
7 reduction of VMT can reduce GHG
8 emissions by between 39 and 65 percent,
9 and then cleaner fleets would increase
10 that impact. As bad news continues to
11 roll in about climate change, we must
12 seize this opportunity.

13 Energy Vision's research on clean
14 and heavy vehicle technologies indicates
15 that compressed natural gas or CNG
16 represents the proven, cost-effective
17 and road-ready option. CNG trucks are
18 readily available on the market and are
19 successfully being used in L.A.,
20 Toronto, Phoenix, Milwaukee and other
21 cities, as well as by major haulers like
22 the public services and Waste
23 Management.

24 CNG mobile currently accounts for 60
25 percent of new refuse trucks -- new

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refuse truck orders in the U.S.

The use of CNG trucks immediately cuts GHG emissions by 20 percent or more relative to diesel. When trucks are equipped with readily-available muse or on natural gas engines, that GHG reduction is more like 30 percent. And public-health-threatening emissions like nitrogen oxides and particulate matter are reduced up to 90 percent below EPA standards.

A critical advantage of CNG vehicles is that they can be fueled with renewable natural gas made from organic waste, also called biomethane. This is the operating form of biogas naturally produced by decomposing organic waste. This happens in landfills, at waste water treatment plants, and in purpose-built anaerobic digesters.

When that biogas is upgraded by removing carbon dioxide and other impurities, it can be used just like conventional natural gas, including as

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vehicle fuel with no alterations to vehicles or dispensing equipment required.

The lifecycle GHG emissions are 80 percent or more lower than diesel fuel, 50 percent or more lower than fossil gas, and the remaining free-waste can actually be net-carbon negative. Meaning, producing the fuel prevents more greenhouse gas emissions than come from using it.

The use by commercial haulers of CNG trucks with near-zero emissions would represent immediate and significant reduction in emissions, both of GHG's and of public-health-threatening nitrogen oxides and particulate matter. It also introduces an opportunity for those trucks to be fueled with carbon neutral or carbon-negative biomethane.

With appropriate investments in our facilities, carters could produce a clean removal fuel from the same organic waste their trucks collect, creating a

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closed-loop, circular economy system that also helps address questions of solid waste disposal, and eliminating methane emissions from landfills.

We applaud the Department for its plans to intensify some of the technologies in its commercial waste zone RFP. We urge the administration and council to work together on legislation, giving cleaner commercial waste collection fleets the priority they deserve. Thank you.

MR. BRAUTIGAM: Thanks, Phil.

The next speaker I have is Frederick Phillips, followed by Miguel Modensi, and Allen Henry, III.

MR PHILLIPS: Good morning. My name is Frederick Phillips, and I am a prospective micro-hauler. I approach the CWZ as a, consumer, who finds the waste of valuable resources distasteful and pollution of the earth unconscionable.

As a master composter, engaged in

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educating the public on the benefits of composted organic waste, I relish the opportunity to enlighten business owners on how they may comply with New York City's zero-waste aspirations and save money by doing so.

With commercial waste zoning implemented, the woeful one percent compliance in diverting organic wastes from the landfill could be substantially reversed.

With the inevitable coming of the -- Green New Deal, the carting industry may wish to get a head start as part of the vanguard of environmental responsibility, instead of being seen as an obstacle, which needs to be dismantled. Let's provide the numerous green jobs ahead of time.

In an industry widely seen as chaotic and downright corrupt, something needs to be done to bring the carting industry into the 21st Century. Let that something be the Commercial Waste

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Zone Program. Thank you.

THE WITNESS: Miguel.

MR. MONDESI: Morning. My name is Miguel Mondesi, I'm a member of Teamster's Local 813 and drive at Action Carting.

Private sanitation workers need the City to hold these companies accountable. I work at one of the better carters, but many of my brothers in this industry are treated terribly. You shouldn't be allowed to deny us overtime. You shouldn't be allowed to work us for 18 hours a night. You shouldn't be able to fire us because we want a union. You shouldn't be able to put a worker on a truck with no safety training and just the clothes on his back. You shouldn't be able to take advantage of workers because they are immigrants or because they have a criminal record. These things happen everyday at bad carters.

We need our City government to clean

1
2 up this industry. You should clean up
3 this industry for Marco Diablo and his
4 family. He worked at Sanitation Salvage
5 for many years, but when he died, and --
6 the job pretended like they didn't know
7 him. He was called crazy and homeless.
8 People knew the truth, but they covered
9 it up because they thought they could
10 get away with it. And for a year, they
11 did.

12 We need waste zones. We need
13 exclusive zones. We need good wages at
14 every company. We need reform now.

15 Thank you all for listening.

16 MR. HENRY: Good morning. My name
17 is Allan Henry, I'm an organizer with
18 the Teamsters Union. I worked in this
19 industry for 30 years. I saw it go from
20 being a middle-class job to a low-wage
21 job. I saw it go from a job with a good
22 pension, with severance, with
23 healthcare, with safety to a job with
24 none of those things. All of the money
25 came out of the workers' pocket, and

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went into the owner's pocket.

That's why the owners of bad carters are so afraid of exclusive waste zones. The City will finally have the power to protect the workers. The City will have the power to make sure every worker gets the wages and safety they deserve. Don't let them scare you away from reform -- from the reform we need.

The City did the study and the scores were lowest with exclusive zones. The truck traffic was lowest with exclusive zones.

We give our lives for this job. You can't have a real life and be a private sanitation worker in the city. You are working fourteen hours, six days a week. When you come home from work, your kids are going to school. When they come home from school, it's time for you to go back to work. And on your day off, you're dead tired and too tired to play with your kids.

I became a union organizer after my

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son joined me in this industry. I wanted -- I wanted a better life for him and other young workers who are coming up.

It's my job to support workers and help them get a voice at their workplace, to help them get a real union and some protections.

And I have seen private carters after private carters use every trick that they can to keep their workers powerless. They threaten them, they punish them, or they'll bribe workers who try to organize to have a union. They force them into fake unions to keep real unions out. No amount of reform would be too much for these companies. If you give them an inch, they will take a mile.

We need exclusive zones with the strongest protections possible for workers. Thank you.

MR. BRAUTIGAM: Thank you.

Are there any other folks who would

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like to speak, who have not yet filled out a card, if you can bring your name. I ask you to put it on the card. Also, if you would like to get a card from the back. If you want to come on and state your name.

MR. WOOD: Yeah, I did fill out a card.

MR. BRAUTIGAM: Justin Wood.

MR. WOOD: Good morning. My name is Justin Wood, I'm from New York Lawyers For the Public Interest. And I'm just going to try to condense this into three topics. Efficiency and cost savings, waste diversion under the zone system; and then the next step, which is legislation and a commercial waste zone policy control implementation.

So the Draft Environmental Impact Statement is based on recent group sheets, and customer data submitted by the carter industry itself. And the GEIS definitively shows that on a citywide basis, thousands of large

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vehicle waste trucks drive much farther than necessary to move commercial wastes from generators to recycling and transfer facilities, and that workers are pressured to work much longer overnight shifts than would be necessary in an efficient system.

Notably, the results of the study demonstrates that carters can reduce and contain operating costs under a zone system, creating system-wide savings that we hope will be invested in better labor standards, fair prices for customers, cleaner truck engines, better recycling practices, and better customer education.

In addition to the non-exclusive CWZ Plan proposed by the City's implementation program, the study includes analysis of an exclusive waste zone scenario, in which a single, accountable waste provider is selected to serve customers in each of 20 zones by a highly competitive RFP process.

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Both VMT reductions and operating cost savings will be significantly more denounced under an exclusive system, than a system with multiple haulers.

The DGEIS finds an exclusive zone reduced VMT in Midtown Manhattan by 79 percent -- pause and think about that. That's a huge reduction compared to the current, inefficient system with 66 and 63 percent reductions in the outer-borough neighborhood study. This translates into a huge \$23 million in operational-cost savings for the haulers, compared to a No-Action Scenario, not to mention a reduction in emissions of greenhouse gases, as trucks are traveling shorter and more efficient routes.

On waste diversion, the study finds that through a far-more-efficient operation system, commercial recycling can be improved from a current baseline of 25 percent -- and I note that haulers' transfer stations self-reported

1
2 annual report showing a lower diversion
3 rate to 44 percent, without a
4 substantial increase in carter and
5 customer costs, and administering -- or
6 experiencing a net increase in local
7 jobs, due to expanded recycling, sorting
8 and processing operations, which are far
9 more job-intensive than landfill and
10 incineration.

11 The study confirms that a CWZ system
12 is the only way to substantially
13 increase commercial diversion without
14 large increases in truck traffic, and
15 operating costs associated with even
16 minimal diversion improvements in the
17 No-Action Scenario.

18 However, I want to stress that the
19 divergence there in the study are quite
20 modest, and a robust CWZ system,
21 combined with strong commercial waste
22 reduction policies could perform far
23 better than the low 6 percent
24 commercial-organics recycling rate, 44
25 percent overall commercial recycling

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rate assumed in the study.

In fact, with only 44 percent diversion, New York City will continue to lag far behind cities like Seattle, San Jose and San Francisco, for example, which have achieved better than 60 percent commercial diversion rates, as high as 65 percent in Seattle last year, driven by aggressive commercial organics recovery programs under versions of exclusive zone systems.

For example, if we achieve a six-fold increase in commercial-organics recycling envisioned in the DGEIS, we'd still be collecting 20,000 fewer compost tons per year in Seattle. Seattle has about a tenth of our population.

So all that is to say that there's enormous room for improvement in creating local jobs and increasing diversion, and reducing greenhouse gases beyond what's even confirmed in this study.

Finally, on legislation and the

1
2 actual policy implementation that's
3 coming down the road. With the
4 efficiency of the CWZ framework
5 confirmed by the study, it's now up to
6 the council and the administration to
7 pass legislation that implements the
8 strongest possible CWZ system,
9 consistent with the social equity and
10 environmental values our City has
11 rightly adopted.

12 Here are some of the key things that
13 we believe should be in this
14 legislation.

15 Fairness for workers. The policy
16 must ensure that workers are treated
17 fairly by employers under the CWZ
18 system. The operational savings for
19 carters must translate into living
20 wages, retirement benefits, reasonable
21 shifts, state-of-the-art safety
22 practices, and job security for the
23 thousands of men and women who haul and
24 process commercial waste every night.

25 This is most feasible through an

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Exclusive Zone System, in which carters have fewer incentives to cut corners on safety, overload routes and underpay workers.

Second, environmental justice. CWZ policy must incentivize the use of state-of-art facilities for processing waste, as well as facilities sited geographically proximate to the hauler's route and/or to the zone.

The City should use this opportunity to help communities overburdened with poorly-sited, truck-intensive transfer stations and can facilitate creation of hundreds of new, high-quality, local jobs by encouraging haulers to make investments in more equitably-sited, safer recycling facilities through the RFC process.

Fairness for small business. Under the CWZ, prices for recycling waste services should be transparent and rational. And every customer should have access to high-quality service and

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effective-enforcement mechanisms when needed. All small businesses should be able to access diversion services, such as organics recycling and waste assessments, which are often unavailable under the current system.

Fourth, waste reductions. The CWZ system should include disposal reduction targets for each zone consistent with the 90 percent production goal of 1 NYC.

In addition to recycling-processing jobs that are studied in the DEIS, a high diversion system can create hundreds of additional good jobs in food rescue, electronics recycling, local organics processing through micro-hauling and facility construction. Many of which can be targeted to disadvantaged-local communities and minority or women-owned business enterprises.

Cleaner air. In addition to the huge VMT reductions enabled by CWZ, legislation can incentivize carters to

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replace dirty-diesel engines with cleaner CNG and/or electric engines.

In particular, an exclusive model would give haulers the long-term financial stability to raise capital and make these investments.

And finally, safer streets. An efficient CWZ system, especially an exclusive system, we would eliminate hundreds of unnecessary diesel-truck miles from local neighborhoods every night, reducing pressure on workers to rush and speed with shorter shifts, decreasing worker fatigue driving.

With the right legislation, this means less danger for pedestrians, cyclists and drivers citywide, safer, more humane working conditions for thousands of drivers and helpers in the industry. Thank you.

MR. BRAUTIGAM: Thanks.

And then, if there are any folks that would like to speak, please fill out a card.

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MR. MCCLURE: Thank you. Good morning. My name is Eric McClure, I'm the Executive Director of StreetsPAC. StreetsPAC is a political-action committee that promotes safe-street policies in New York City, and we're endorser of Transformed on Trash NYC.

As advocates for safer streets, we strongly urge the adoption of the Exclusive Zone Alternative for a safe commercial waste zone program.

As the analysis conducted for the draft Generic Environmental Impact Statement makes clear, the Exclusive Zone Alternative will significantly reduce vehicle miles traveled compared to the proposed action, reducing overall private hauler VMT by 60 percent, versus 50 percent for a non-exclusive zone program. A difference in nearly three million miles traveled annually.

Given the fact that drivers of commercial waste vehicles have killed more than two dozen people on city

1
2 streets over the past five years, this
3 is a significant and potentially
4 life-saving difference.

5 The reduction in VMT will be more
6 pronounced in the densest parts of the
7 City. An exclusive zone program will
8 reduce VMT in Midtown Manhattan's
9 central business district by 52 percent,
10 versus the proposed non-exclusive
11 program.

12 The additional reduction of vehicle
13 miles traveled from the Exclusive Zone
14 Alternative will provide other important
15 benefits besides improved safety.

16 Reduced VMT will mean better air
17 quality and lower greenhouse gas
18 emissions, and the more streamlined
19 routing of trucks will lead to reduced
20 noise levels, as well. Importantly,
21 worker safety will also be optimized
22 under an exclusive zone system.

23 Finally, the exclusive zone requires
24 fewer trucks and less fuel, leading to
25 significant cost savings for the

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commercial haulers and workers of
exclusive zone contracts.

Some of these savings can be passed
along to customers, offsetting concerns
about increased costs due to reduced
competition, which the City can also
manage through better regulation.

The long-term stability created by
the exclusive zone system will best
enable private haulers to amortize
investments in newer, cleaner-and-safer
trucks and technology, thanks to the
stable-customer base,
predictable-revenue stream and
long-term, enforceable contracts in New
York City that such a plan would create.

We urge adoption of an exclusive
zone plan for New York City's commercial
wastes.

Thank you.

MR. BRAUTIGAM: Okay. That's all
the cards that I have from people who
had requested to speak.

Is there anyone else who has -- who

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didn't get the instructions to get the card from the back table and get their name down? Anyone else would like to speak?

If not, then that's it for this part of the program. We will keep the record open this morning.

We have our court reporter here, so if folks want to -- if people still arrive and have comments, then we will take down their comments; but other than that, thank you all for coming this morning.

We'll have another hearing, as I mentioned, on Thursday starting at 6:00 p.m. in this same room on March 14th.

Thank you for coming.

MR. BRAUTIGAM: Okay. So Eric Goldstein will be giving his comments on the Draft Environmental Impact Statement.

MR. GOLDSTEIN: Good morning. My name is Eric Goldstein, and I'm New York City Environment Director of the Natural

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Resources Defense Council.

As you know, NRDC is a national non-profit, legal and scientific organization that's been active on a wide range of environmental health, natural resource protection and quality-of-life issues internationally, around the country and right here in New York City since our founding in 1970.

I'm going to summarize my written statement today, which I'd like entered into the record.

NRDC has been engaged regionally on solid-waste issues for more than four decades, seeking to transform New York City's waste policy from primary reliance on landfilling and incineration to a system that has waste prevention, recycling, composting and equity as its cornerstones.

Under the current system for commercial waste collection in New York City, diesel-power trucks from more than 90 different privately-owned carter

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companies race across the city streets in an irrational routing scheme that generates unnecessary pollution, threatens public safety, and exploits the drivers and helpers who often receive low pay and poor benefits for their dangerous work.

Some routes require as many as 1,000 stops in all five boroughs with shifts lasting 12 hours or more. Some neighborhoods have more than two dozen separate corridors driving to stores on the very same block every night.

Making matters worse, private carters haul their collected trash to land-based, waste-transfer stations located disproportionately in overburdened communities of color, where the waste is combined, usually loaded onto larger diesel trucks and shipped to distant landfills and incinerators. As this summary illustrates, the current system for handling New York City's commercial waste is completely broken.

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On February 22, 2019, the City Department of Sanitation released a Draft Environmental Impact Statement for its commercial waste zone plan.

The City's waste zone plan would implement the comprehensive reform of the system by dividing the city into 20 zones with a limited number of carters per zones, and with carters whose waste zone contracts -- who, in waste zone contracts, being obligated to meet contractual requirements to reduce vehicle miles traveled and associated air emissions, comply with industrial health and safety standards, achieve enhanced recycling and composting goals, and provide fair and more transparent service to customers.

NRDC strongly supports the concept of commercial waste zones, and many of the details proposed by the Department in its DEIS. We believe the DEIS satisfies the requirements of state and city law.

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And for the reasons set forth below, we urge the Department to select the Exclusive Zone Alternative described in Chapter 9 of the document.

The DEIS outlines multiple ways, in which environment and social benefits would accrue from implementation of the Commercial Waste Zone Program.

First, the DEIS concludes that implementations of commercial waste zoning would reduce by at least 50 percent the total vehicle miles traveled by commercial waste haulers.

The Department has estimated that the commercial -- that commercial waste trucks travel over 23 million miles every year. Thus, a 50 percent reduction would slash diesel-waste truck travel by about 11.5 million miles every year -- a total distance of more than 23 times to the moon and back.

In addition to greatly reducing threats to pedestrians and enhancing worker safety from lower mileage and

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slower speeds, such dramatic decreases in waste trucks' traffic would bring big reductions in global warming discharges and ground-level air pollution.

The DEIS estimates that greenhouse gas emissions will be cut between 39 and 66 percent, in comparison to baseline conditions before implementation of the waste zone plan.

The waste zone proposal would also boost the percentage of commercial waste that would be collected for recycling and composting from the current estimated 24 percent to 44 percent.

And among other expected benefits for workers, the City projects that a commercial waste zone would create 465 additional jobs in recycling, sorting and processing, which would exceed by four times the number of jobs lost through consolidation in the carting industry.

The Department's DEIS, and its Environmental Review Process have thus

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far fulfilled the requirements of State and City law.

Most fundamentally, the Department's proposed waste zone plan, and its environmental review process have been consistent with the state legislature's intent expressed in the state solid waste -- State Environmental Quality Review Act, that, quote, "All agencies conduct their affairs with an awareness that they are stewards of the air, water, land and living resources, and that they have an obligation to protect the environment for the use and enjoyment of this and all future generations" -- end quote.

Moreover, both State and City environmental review statutes direct the lead agencies to undertake significant public involvement in their environmental review process.

And hereto, the Department has launched its review process with great transparency and full public engagement.

1
2 For example, in addition to the two
3 public hearings that have been
4 specifically scheduled to take comments
5 on the DEIS, the Department held a
6 series of waste-zone-related stakeholder
7 meetings over the past year, in which
8 more than 40 representatives of various
9 affected constituencies were in
10 attendance.

11 Finally, the DEIS itself covers all
12 of the major topics required to be
13 incorporated into such a document, as
14 set forth in the State regulations and
15 the State Department of Environmental
16 Conservation SEQRA handbook, including:
17 A description of the proposed action;
18 the needs, benefits and adverse impacts
19 of the proposed action; mitigation
20 measures proposed, alternatives
21 considered, and social-and-economic
22 impacts of the proposal.

23 NRDC has reviewed the DEIS in detail
24 and recommends that the final
25 environmental impact statement adopt the

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Exclusive Zone Alternative discussed in Chapter 9 of the document. This chapter illustrates the additional public benefits that could accrue from implementation of an exclusive zone system.

For example, exclusive zones would reduce vehicle miles traveled by an additional 8 percent with consistent reductions in global warming emissions, ground-level air pollution, and enhanced pedestrian and worker safety.

The DEIS also found that an exclusive zone system would result in further reductions in costs associated with commercial waste carting operations, increasing efficiencies in payroll by an additional two percent, and efficiencies in routing by an additional 6 percent.

As for concerns that an exclusive zone system might result in increased cost for commercial businesses, there are mechanisms the Department could

1
2 employ, including price gaps, to
3 minimize any such impacts.

4 In short, we believe that it is a
5 mistake to dismiss this alternative,
6 which offers even greater benefits for
7 City residents, and would better help
8 achieve the administration's climate and
9 efficiency of goals, while maximizing
10 the efficiency of the new waste zoning
11 system.

12 Finally, we urge the Department to
13 go into greater detail in its FDEIS
14 regarding two important items.

15 First, we recommend that the FDEIS
16 set forth more specifically how the new
17 commercial waste zone system will
18 address the socioeconomic issue of
19 providing fair wages, and improve
20 benefits for workers employed by the
21 companies that secure waste zone
22 contracts.

23 In our view, an essential reform
24 that must be incorporated into the final
25 waste zone plan is provision to improve

1
2 the pay scale and working conditions of
3 commercial-carter drivers and helpers.

4 The FDEIS should spell out how the
5 specific labor enhancements that will be
6 encouraged and required -- I'm sorry --
7 the FDEIS should spell out the specific
8 labor enhancements that would be
9 encouraged and required under the new
10 commercial waste zone scheme.

11 Second, we recommend that the FDEIS
12 describe in greater detail how the
13 Department plans to encourage the
14 greater use of its newly renovated
15 marine-transfer stations by those
16 commercial carters who secure the new
17 zone contracts.

18 One mechanism for accomplishing this
19 objective would be to give additional
20 points in the selection process to those
21 carters, who indicate that they would be
22 willing to deliver some or all of their
23 collected waste to one or more of the
24 City's new four MTS facilities.

25 We thank you for the opportunity to

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present NRDC's comments on the DEIS and look forward to working with the Department in the months ahead to implement what we believe will be New York City's most significant waste policy reform in at least 30 years.

If widely implemented, the new commercial waste zone policy will bring widespread benefits to neighborhoods, residents and workers throughout all five boroughs.

I thank the audience for its participation and cooperation.

MR. BRAUTIGAM: Thank you, Eric.

There being no other persons wishing to make comments, we can suspend this hearing until Thursday evening. Thank you.

(Time Noted: 9:46 a.m.)

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C E R T I F I C A T E

STATE OF NEW YORK)

:ss

COUNTY OF NEW YORK)

I, TIFFANIE JONES, a Notary Public within
and for the State of New York, do hereby
certify:

That the witness whose examination is
hereinbefore set forth was duly sworn and that
such an examination is a true record of the
testimony given by such a witness.

I further certify that I am not related to
any of these parties to this action by blood or
marriage, and that I am not in any way
interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my
hand this 11th day of March, 2019.


Tiffanie Jones

NYC - Department of Sanitation Public Hearing
March 14, 2019

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ENVIRONMENTAL REVIEW
OF PROPOSED
NY COMMERCIAL WASTE ZONE
HEARING

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Thursday, March 14, 2019

6:05 P.M.

125 Worth Street, 2nd Floor Auditorium
New York, NY 10013

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APPEARANCES:

Steve Brautigam, Assistant Commissioner for the
Bureau of Legal Affairs for the Department of
Sanitation

Linh Do, Vice President of AKRF, Inc.

Raul Torres,
Executive Vice President of Arcadis US, Inc.

PUBLIC COMMENTORS

Fernando Ortiz
Kendall Christiansen
Joe Arias
Ramses Dukes
Tok Michelle Oyewole
Ron Bergamini
Chio Valerio-Gonzalez
Brendan Sexton
Jose Garcia
Suany Velez
Leslie Velasquez
Rodney Hawkins

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2 MR. BRAUTIGAM: Okay. Come on,
3 guys, and take a seat. We'll get
4 started here. Great. So good evening
5 everyone. Thank you all for coming to
6 this public hearing on the Environmental
7 Review for the proposed Commercial Waste
8 Zone Program for the City of New York.
9 Today is March 14th, it's about five
10 past 6:00.

11 And I am Steve Brautigam, Assistant
12 Commissioner for the Bureau of Legal
13 Affairs for the Department of
14 Sanitation, and we are -- the Department
15 of Sanitation are serving as the lead
16 agency overseeing the Environmental
17 Review for this project.

18 This hearing is required, pursuant
19 to the State Environmental Quality
20 Review Act, and the City Environmental
21 Quality Review Procedure. So it's a --
22 the intent here is to give the public an
23 opportunity to comment on our Draft
24 Generic Environmental Impact Statement
25 that we released on February 22nd.

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2 We've noticed this hearing in the
3 New York post and the City Record, and
4 in the Environmental Notice Bulletin.
5 We released the -- as I mentioned, the
6 Draft Generic Environmental Impact
7 Statement. The document is available on
8 the Department of Sanitation's website,
9 and a copy of it is on the table in the
10 entry over there. We also have released
11 the final scope of work that's to guide
12 the preparation of that Draft Generic
13 Environmental Impact Statement.

14 But with that, let me just go
15 through the program tonight. Most of it
16 is going to be devoted to time for folks
17 to offer their comments; but we have,
18 first of all, som -- an introduction,
19 and then we're going to have a short
20 presentation of the findings of the
21 Draft Generic Environmental Impact
22 Statement, and then I'll briefly review
23 the procedures we'll use tonight to get
24 your comments. And then, we'll get your
25 comments. That's the most important

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part of the hearing.

So with that, let's move on to a quick overview of the framework for evaluating the commercial Waste Zone Program. So under the City's Environmental Quality Review Act procedures, I mentioned that we are required to study the impacts of proposed discretionary actions. So the City's Environmental Quality Review -- or CEQR, as the shorthand, is called -- we have a technical manual that tells us what to look at. So there are 19 different areas that may potentially be implicated for a project; anything from traffic and air quality, water quality, depending on what the project involves.

This one is a generic review because there's no actual physical project, but it involves the entire city; and as you'll hear, zones that we're proposing to divide the city up into for commercial waste collection.

The Environmental Review itself does

1
2 not dictate any outcome. It is just to
3 give the decision-makers information in
4 making a decision on the proposed --
5 there will be proposed legislation here,
6 so it'll be the City Council and the
7 mayor acting. And then, any rule
8 mentioning, that would be handled by the
9 Business Integrity Commission or the
10 Department of Sanitation -- and/or the
11 Department of Sanitation.

12 So the next slide that briefly shows
13 you, you know, on a linear graph the
14 Environmental Review procedures. So we
15 started with the release of the
16 Environmental Assessment Statement,
17 which was a first-level review of the
18 environmental impacts of a project. And
19 we determined that it had the potential
20 for significant impacts, and, therefore,
21 we had to go deeper and do what's -- an
22 Environmental Impact Statement.

23 In doing so, we needed a document to
24 guide us, and that was a draft scope of
25 work for this Draft Generic EIS. We

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released that for public comment and got comments, and began to prepare the document. And on February 22nd, we released the document. And we also released the final scope of work, which included responses to the public comment that we received on that scope of work for that Environmental Impact Statement.

So we're going to hear comments on that draft GEIS and the kinds of -- so tonight's hearing is not really a pros or cons, discussing the merits of the proposal itself; but it's to see: Did we study it properly? Did we get any facts wrongs? Did we describe the industry correctly? So that's the kind of comments we're especially looking forward to hearing from you on. And if there's anything else that we should be studying that we didn't study. So that kind of feedback is especially valuable to us.

So we're going to take your comments back and consider them, and incorporate

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them as appropriate into a final Environmental -- Generic Environmental Impact Statement. And then, the decision-makers will be guided by that, and review of the alternatives in making their decision on the proposal.

So tonight, we're not going to individually answer your comments or questions that you may pose, but we'll take them down. We have a court reporter here that's making sure we get the transcripts accurately. And if you have any written statements, of course, you can deliver them to us and we'll make those part of the record.

You'll also have additional time to submit comments. If you think of something that you didn't say tonight, or if you have people -- others who didn't come tonight and have comments, you know, please send them in. We are -- decided to extend the public comment period. Instead of ending on March 25th, as we had said in our public

1
2 notice, we're going to extend it to
3 April 8th at 5:00 o'clock. So another
4 two weeks for public comments. So we'll
5 have that posted on our website, as
6 well. So you can submit your comments
7 in -- in any language that's comfortable
8 for you. We prefer if you're sending
9 them in written language, it's easier in
10 English, but -- anyway, they will all be
11 given equal weight.

12 So with that, let's move to the
13 second portion of tonight, which is a
14 presentation on the Commercial Waste
15 Zone Proposal Program, presented by Raul
16 Torres from our consultants, Arcadis.

17 MR. TORRES: Thank you, Steve. And
18 good evening, everyone.

19 The City of New York is proposing an
20 implementation plan, a contract award
21 process to develop a zone commercial
22 waste system, the Commercial Waste Zone
23 Program, throughout the City of New
24 York, all five boroughs.

25 The commercial Waste Zone Program

1
2 would develop geographic zones within --
3 which a limited number of carters will
4 be authorized to operate within each
5 zone. The commercial Waste Zone Program
6 would advance the City's efforts to
7 increase commercial recycling, reduce
8 carter-truck traffic, and associated
9 air, noise, greenhouse gas emissions
10 improving carter-industry performance
11 standards.

12 Today's commercial waste system
13 achieves the basic goal of collecting
14 and handling the City's commercial
15 waste, but the competitive market has
16 resulted in inefficiencies with
17 overlapping carter routes, and extra
18 truck traffic resulting in increased
19 pedestrian risk, traffic congestion, air
20 and noise pollution, road wear and
21 increase use of fossil fuels and
22 greenhouse gas emissions, all
23 contributing to climate change.

24 Further, compliance with the City's
25 safety, equipment and training

1
2 requirements and necessary equipment
3 maintenance are often not enforceable
4 under the current system. And contracts
5 for pricing are not apparent or
6 transparent to customers.

7 Since July of 2017, over 150
8 different stakeholders have been
9 consulted to determine the program
10 goals, implementation strategies, and
11 the necessary requirements for the
12 eventual carter contracts within the
13 Commercial Waste Zone Program. Going
14 forward, the City and project team is
15 expected to continue work with the
16 stakeholders during the public review,
17 and implementation phases of the
18 Commercial Waste Zone Program.

19 The Commercial Waste Zone Program
20 would create zones, assigning only a
21 certain number of carters to each zone.
22 Thereby, minimizing route
23 inefficiencies, overlap, truck traffic
24 and overall environmental impacts from
25 the industry.

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2 Under the Commercial Waste Zone
3 Program, private carters would
4 competitively bid for the right to
5 service businesses within geographic
6 collection zones. Carters that win zone
7 contracts would be obligated to meet
8 certain contractual requirements aligned
9 with the City's program goals and
10 objectives.

11 For customers, the Commercial Waste
12 Zone Program would standardize the
13 carting contract process by requiring
14 written services between the carters and
15 the commercial customers, and making
16 pricing structures more transparent.

17 Customers will require -- will
18 continue to be able to choose carters
19 that are awarded the service in question
20 zones, and would be able to switch from
21 one carter to another at their
22 discretion.

23 The Commercial Waste Zone Program
24 would build on the current regulatory
25 system with a contractor-based system

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2 where carters are subject to clear
3 requirements stated in the contract.
4 The contracts awarded to selected
5 carters would be long term, provide for
6 transparent and fair pricing and
7 customer-service mechanisms required to
8 improve environmental performance and
9 ensure compliance with -- and compliance
10 and enforcement of existing and new
11 requirement. Non-compliance could
12 result in monetary penalties or loss of
13 a given contract.

14 Overall, the Commercial Waste Zone
15 Program would provide stability to the
16 commercial waste zone, the waste
17 industry by providing carters with
18 predictable business, and promoting
19 long-term investments in recycling and
20 cleaner trucks.

21 The Commercial Waste Zone would
22 likely be implemented in multiple steps.
23 The competitive solicitation process
24 would be expected to begin in early
25 2020. The request for proposals would

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be released for all zones, and all proposals will be reviewed and evaluated concurrently.

Once all the contract agreements are secured, customer transitions would begin at the end of 2021, and could take up to two or three years to complete; to be completed by 2023 or 2024.

So while an award would be simultaneous, at the same time, the rollout could be phased. The DSNY would continue to serve as the project manager for the Commercial Waste Zone Program in this capacity. With overseeing the competitive solicitation process, negotiation of each zones' contract between the City and the carter for the right to collect waste, and the overall transition to commercial waste zones.

So what does the commercial waste zone look like?

Based on consideration from stakeholders and the feedback we received, the chosen, proposed zone

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design consists of 20 non-exclusive zones with three to five carters operating within each zone. The design was chosen, due in part to maintain competition, fair pricing and profitability for the carter and, thus, minimize market disruption.

Customer businesses will be able to choose from a number of carters, allowing prices to be competitive and potentially maintained. Carters will be able to protect profitability through competitive pricing and maintaining the customer base.

With that, let me turn it over to Linh Do, from AKRF, to discuss more specifics on the Draft Environmental Impact Statement.

MS. DO: Thank you. As mentioned previously, the Draft GEIS was released for public review on February 22nd of 2019. The Draft GEIS will define -- defines the scope of work, which was also issued on February 22, 2019.

1
2 How do we determine the potential
3 effects that may be caused by the
4 Commercial Waste Zone Program?

5 To do this, we look at three
6 scenarios. The first, we define
7 existing conditions in order to
8 determine what is the baseline to start
9 with. Second, we determine the build
10 year, in which the program is
11 anticipated to be complete and fully
12 implemented. For our program, it is to
13 be implemented by the year 2024. We
14 then will get what conditions might
15 exist in that future year, if the
16 proposed commercial waste zone was not
17 implemented, which would be similar to
18 -- which would be similar to today.
19 Future commercial waste-removal
20 operations would be similar, but would
21 operate under some additional local law
22 compliance. This is referred to as the
23 no-action scenario.

24 Third, conditions with the action.
25 That is, with the program fully

1
2 implemented. It is a difference between
3 it being fully implemented and not.
4 That is measured in the EIS.

5 As the program is generic, the Draft
6 GEIS studied representative types of
7 commercial clusters and corridors within
8 the New York -- within New York City,
9 and included the analysis of the
10 program's likely effects on its
11 environmental setting. Three
12 representative neighborhoods -- case
13 study areas -- were selected of typology
14 to provide more details and contextual
15 analysis of the potential benefits and
16 adverse affects of the program in
17 several New York City communities.

18 The first case study that was
19 selected is the Midtown Manhattan
20 commercial business district. Since it
21 is representative of the high-density
22 commercial business district with
23 commercial-waste producers ranging from
24 small scale retail and restaurants to
25 large offices. The area also includes

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large destination and retail, as well as major entertainment destinations.

The Flatbush Nostrand Junction represents a mixed-use neighborhood corridor and commercial cluster, and serves major retail and a transportation center in Central Brooklyn. Commercial retail within this district includes small businesses, and in recent years, larger national chains, as well as very small offices and other commercial spaces.

The College Point neighborhood in Queens represents a lower-density district. College Point businesses are not centralized within defined clusters or corridors, but are distributed throughout the neighborhood and includes small businesses, such as restaurants and local retail. The district also includes some larger commercial-waste producers and large retail centers.

As previously noted, the Draft GEIS assesses potential impacts for 24 --

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2024 analysis year, when the program is expected to be fully implemented. The CEQR technical manual is a detailed guidance that outlines and sets the framework for this Environmental Review, and we look at 19 technical areas that will be considered in the project's potential effects.

Of these 19 technical areas, certain areas were screened out because they were not relevant. They included community facilities, open space, shadows, historic, urban design, natural resources, hazardous materials, water and sewer, energy and construction. Listed on the slide behind me are the technical areas that were assessed, some of which I will present in summary highlights tonight.

Additionally, based on feedback that we received during the public scoping process, the GEIS also includes a chapter on the transition period effects. That is, before the Commercial

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Waste Zone Program has been fully implemented.

First off, in socioeconomic conditions, we studied the potential effects of the program on industry viability and to commercial businesses that use the carting services. Under the program, potential changes to the commercial carting industry operational costs would not jeopardize the viability of the industry, or the ability to provide citywide carting services at a reasonable cost to commercial businesses.

As a result of the efficiencies associated with the zone routing, including the reduction in routes necessary to collect an equal amount of waste, the total operational expenses to be incurred by the carting industry are anticipated to decrease, despite the additional equipment and administrative costs associated with the program.

While the commercial waste zones

1
2 have the potential to reduce the total
3 number of commercial carriers operating
4 within the City of New York, carters
5 that fail to win zone contracts may
6 transition to collect enough non-zone
7 waste streams, such as construction and
8 demolition, engage in other agreements,
9 such as subcontracts to support the
10 contracting carters and/or consolidate
11 companies. They could also concentrate
12 on carting opportunities in the
13 Metropolitan area, outside of New York
14 City, or remove themselves altogether
15 from the industry.

16 Despite the potential for some
17 carters to close, the remaining
18 commercial carters continuing to operate
19 in the program are anticipated to
20 continue providing effective
21 waste-collection services across the
22 city.

23 Businesses that pay for the
24 commercial-carting services would likely
25 benefit from the program, as -- as the

1
2 program would not result in substantial
3 increases, to the expenses associated
4 with the waste collection. Customers,
5 regardless of industry sector or
6 location, would likely receive the group
7 services, including free waste
8 assessment, and access to a dedicated
9 call center at a competitive rate as a
10 result of the program.

11 As such, the Commercial Waste Zone
12 Program is not anticipated to result in
13 significant adverse effects on the
14 commercial waste-carting industry, or to
15 the customers of the commercial-waste
16 carters.

17 The solid-waste management chapter
18 of the EIS studies the potential effects
19 of the program on the City's Solid Waste
20 Management System, as well as reviews
21 the program's consistency with the
22 City's larger solid-waste management
23 plan.

24 This Commercial Waste Zone Program
25 is not expected to increase the volume

1
2 of waste being produced or collected,
3 but it would result in the
4 redistribution of what waste would be
5 collected, and by which carter it would
6 be collected. With more recycling and
7 organic materials being separated under
8 this program, less waste would be sent
9 to landfills, saving resources and
10 energy, which is consistent with the
11 City's sustainability and recycling
12 goals.

13 The program would support the solid
14 waste management plan -- the SWMP --
15 goals, reducing truck traffic, thereby,
16 noise and air emissions, and enhancing
17 pedestrian safety while providing
18 sufficient capacity to collect
19 commercial waste generated within the
20 city. Therefore, the program would not
21 result in significant adverse impacts to
22 waste -- solid waste or sanitation
23 services.

24 On transportation, we look at the
25 effects on the system. Under the

1
2 Commercial Waste Zone Program, the
3 number and type of customers would not
4 be expected -- would be expected to
5 remain the same under the -- as under
6 the no-action condition. However, the
7 program would limit the number of
8 carters within the GEIS zones, which
9 would result in increased efficiency in
10 waste collection routes, such that
11 associated vehicle miles traveled and
12 overall carter truck traffic would
13 decrease. It is anticipated that
14 approximately 275 less trucks would be
15 required to effectively and efficiently
16 collect commercial waste within the
17 city.

18 The Commercial Waste Zone Program is
19 expected to reduce citywide
20 commercial-carter truck VMT's by
21 approximately 50 percent from the
22 no-action condition, and by 47 to 60
23 percent within the case study area.
24 Therefore, detailed traffic analyses
25 were not warranted, and the program is

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not anticipated to result in any significant transportation impacts.

Alternatives. Although the Draft GEIS did not identify a significant adverse impact in the program on any of the environmental categories, we did look at two alternatives to the Commercial Waste Program. One is the no-action alternative, and the other is the exclusive-zone alternative.

The no-action alternative predicts that the environmental conditions that would exist without the program would remain unchanged, with the exception of a few regulatory changes to the industry that is already expected by the year 2024.

As with the Commercial Waste Zone Program, the no-action alternative would not result in significant adverse impacts. However, many of the benefits that would be realized under the program, such as advancing the City's efforts to increase commercial

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recycling, reducing the carter-truck traffic and associated air-quality noise and greenhouse gas emissions, improving the carting industry operational standards and establishing a mechanism to enforce applicable regulations would not be realized.

Under the no-action alternative, carter operational expenses and administrative costs are anticipated to increase as a result of increased diversion goals, the retrofitting of trucks to comply with no emission requirements, and the installation of side guards to all commercial-carter trucks. This alternative would also result in higher total number of trucks in our program, as there would be no routing efficiencies and additional trucks would be required to waste -- to collect all waste streams.

Under the exclusive-zone alternative, a single carter would be awarded the exclusive right to provide

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2 collection services within each of the
3 designated-service zones. As with the
4 Commercial Waste Program, the
5 exclusive-zone alternative would not
6 result in significant adverse impacts.
7 And it is anticipated to further lower
8 operational costs of carters, and reduce
9 employment compared to the Commercial
10 Waste Zone Program due to better zoning
11 routing efficiencies.

12 However, the exclusive zone
13 alternative would have drawbacks, such
14 as with respect to anticipated price
15 increases to customers as a function of
16 reduced competition, raising risks of
17 carter-solvency within a restricted
18 market, and an increased risk in the
19 inability of an exclusive carter to meet
20 the customers' needs. The elimination
21 of competition within the commercial
22 waste zones has the potential to
23 increase costs to -- of commercial
24 carting services to customers, and could
25 lead to a reduction of customer service

1
2 and satisfaction due to a single-service
3 provider. It is a monopoly that would
4 be created by the exclusive zone system.

5 Further, implementing the exclusive
6 zone alternative has the potential to be
7 a substantial, logistical challenge. As
8 few carters have the capacity to
9 exclusively service a single zone, a
10 larger number of customers would be
11 required to change service providers in
12 the transition period, and potential
13 future-service issues could develop, if
14 a single carters is unable to
15 successfully provide the necessary
16 services. Therefore, the Commercial
17 Waste Zone Program remains the preferred
18 alternative.

19 And lastly, we address the
20 commercial waste zone transition period.
21 As other cities around the United States
22 have adopted similar programs to the
23 Commercial Waste Zone Program, the city
24 has been able to review their transition
25 and implementation, adopt the best

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practices and implement lessons learned from these peer cities.

The best practices and lessons learned have been incorporated into planning, transition and implementation of the Commercial Waste Zone Program to minimize the adverse impacts to the city during the transition period.

It is anticipated that during this transition period, carters awarded with contracts would have additional operation expenses and administrative costs to cover activities required under the program. Existing New York City carters, in anticipation of the competitive-bidding process, may choose to consolidate companies or remove themselves from the market. As a result, during this transition period, it is also expected that there would be some transition of the labor force to shift employees from carters that did not win awards, to awarded carters. DSNY will provide aid during this labor

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transition process.

Further, carters will likely need to establish new routes to conform to the zone boundaries. Any carters that are not awarded contracts or zones may continue to service customers in that zone until the end of the transition period.

The combination of the carters continuing to service customers through the transition period with new intermediate routes operated during this period would have the potential to result in temporary increases in the number of commercial waste trucks, and minor increases to the vehicle miles traveled. However, these minor increases in trucks and VMT's during the transition period would gradually be offset by reduction of the VMT -- of the program itself once it is fully rolled out, and it is not expected to result in significant impacts. These temporary increases would be eliminated after the

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transition period ends.

Overall, the activities associated with the transition period for the program are not expected to result in significant impacts. Steve.

MR. BRAUTIGAM: Thanks, Linh. Thanks for that overview. So let's move on to the next part. I want to just simply go over the procedures we'll be using to get your comments, so that we can have an accurate record with our court reporter here. I'll call on speakers in the following order: If there are any elected officials here tonight, first, then any representatives of elected officials and any members of city or state agencies or community board members or their representatives, and then members of the general public.

So if there's anyone who wants to speak, you should fill out a card at the table at the entrance there -- the speaker cards, with your name, and then bring it forward when you -- and then

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we'll take them in the order, which they were received.

So with that, let me ask: Is there -- are there any elected officials? I see none. Are there any representatives of elected officials? I see none. Any city or state agencies? Community board members?

All right. Then, we'll go with members of the public. And I'm going to read the names of three at a time, so that the next folks can be on deck and be ready to speak. We're going to -- please limit your comments to three minutes at a time, so that we can get everyone who wants to speak.

And a reminder here of the address for sending in written comments up until the end of the public-comment period, which is -- as I mentioned -- has been extended by a few weeks to April 8th at 5:00 p.m. So with that, let's hear from, first, Fernando Ortiz, then Kendall Christiansen, and then Joe

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Arias. Come up here.

MR. ORTIZ: Good evening. My name is Fernando Ortiz, and I'm a climate preparedness and resiliency organizer for Hunts Point CDC, which is a non-profit organization dedicated to youth development, and the cultural and economic revitalization of the Hunts Point section of the South Bronx.

I am here today to show support for the New York exclusive Commercial Waste Zone Program Environmental Impact Statement, and intend to ensure that the impacts of environmental for just this community are at the forefront in the proposed legislation.

Hunts Point is in the South Bronx, a significant maritime industrial area, one of six in New York City. This zone designation allows heavy industrial activity and maritime use within our community, such as the Hunts Point Food Market, 15 waste-transfer -- with 15 waste-transfer stations, the Hunts Point

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2 waste-water treatment plant and many
3 other industries, like, Best Direct,
4 which require high volume of diesel
5 trucks passing through our community,
6 the Major Deegan, Sheridan and Bruckner
7 Expressways also border our community.
8 The South Bronx is home to about 6.5
9 percent of the city's population, yet
10 handles 100 percent of the Bronx waste,
11 and about 30 percent of all of New York
12 City's waste.

13 The proximity to hazardous waste
14 sites and to high-truck traffic
15 intensifies the public health concerns
16 around poor-air quality in the South
17 Bronx. An estimated 15 to 20,000
18 diesel-fueled truck pass daily through
19 Hunts Point, making their way to the
20 expressway or from the industrial sites
21 located within our communities, and
22 making our streets unsafe to cross.

23 The South Bronx and Hunts Point
24 community has some of the highest asthma
25 rates in the city. Hunts Point has some

1
2 of the highest communities with PM2.5
3 contaminants in the air, harmful
4 particles that enter our respiratory
5 system, and contribute to illnesses such
6 as asthma and lung cancer. The asthma
7 rates in the South Bronx are eight times
8 the national average, with one in four
9 children suffering from asthma and about
10 30 -- and which accounts for about 33
11 percent of children hospitalization.

12 The Bronx supports the New York
13 commercial waste zone Environmental
14 Impact Statement because of the benefit
15 it can provide for the South Bronx, and
16 for other environmental justice
17 communities throughout New York City.

18 The exclusive alternatives to
19 commercial waste zone will result in
20 significant reductions in air pollution,
21 GHG emissions and noise, by taking miles
22 of truck traffic off of New York City
23 streets.

24 While the waste equity bill passed
25 this last year, it was instrumental in

1
2 garnering the reductions in permitted
3 waste capacity in Brooklyn, the Bronx,
4 and South East Queens. We believe that
5 the forthcoming legislation can further
6 prioritize environmental justice
7 communities, and ensure reduction of
8 vehicle miles by ensuring that waste is
9 transported to the waste transfer
10 stations geographically closest to the
11 waste collection zones.

12 We encourage the mandatory
13 truck-count monitoring to ensure that
14 vehicle transport is actually reduced in
15 communities like ours, where on some
16 corners in the South Bronx, 304 trucks
17 per hour drive by; 45 percent, which are
18 waste trucks. This could result -- this
19 would result in dramatic reductions in
20 PNC2.5 emissions and other air
21 pollutants.

22 Furthermore, we encourage the
23 incentivization of commercial waste
24 haulers to utilize nearby waste-transfer
25 stations, which are equitably

1
2 distributed throughout the city. At the
3 MTS's, marine barges have the capacity
4 to displace vehicle miles from the
5 export of waste from the 48 long-haul,
6 diesel trucks. I also hope that this
7 bill considers the issue of
8 overnight-waste storage on the roads in
9 Hunts Point. This is the immediate and
10 next step in overcoming the
11 disproportionate overburden that the
12 community has endured due to the high
13 concentration of transfer stations and
14 truck traffic in our community of the
15 south Bronx.

16 We applaud your efforts to analyze
17 exclusive commercial waste zones, and
18 encourage you to move forward with this
19 implementation and to prioritize
20 environmental justice communities that
21 have held the burden for waste equity
22 for far too long. Thank you.

23 MR. CHRISTIANSEN: This statement is
24 offered on behalf of New Yorkers For
25 Responsible Waste Management. My name

1
2 is Kendall Christiansen, and I serve as
3 the executive director. New Yorkers For
4 Responsible Waste Management is a
5 consortium of locally-owned and operated
6 waste and recycling service companies
7 licensed and regulated by the Business
8 Integrity Commission, and the Department
9 of Sanitation. We provide companies
10 with waste-management services for New
11 York City's businesses and industries
12 and some residential property, as well
13 as for the City itself.

14 We have been engaged in this issue
15 for several years, with several members
16 participating in the DSNY's advisement
17 board, despite our reservations about
18 and objections to the City's intended
19 course of action, and as well as
20 disagreements with much of the data
21 underlying the City's plan.

22 We also have helped New York's other
23 stakeholder groups to understand the
24 current state of the industry and its
25 operations and challenges, what's being

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proposed, what's at stake, best practices from other cities and other matters of interest, including the realtime perspective on the Los Angeles experiment with monopoly zones.

We expect to submit comprehensive comments regarding the Draft GEIS, along with several other business and industry groups. This week, we requested a reasonable extension of time to allow for a full-and-fair, hard look at the DGEIS, and also requested that additional public hearings be held throughout the city during that extension period. We hope advocates for the plan will support, both to broaden public consideration and engagement.

Given that L.A. is often cited as the inspiration for New York's consideration of a zone-franchise system, which has failed to gain traction when previously considered here at previous points in time, it's worth noting at this point in the process,

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L.A. allowed for a 50-day comment period and held six public hearings during the public review process.

As of this afternoon, the DSNY plan does 45 days and two public hearings, both in Manhattan. Last May, nearly a year into its implementation of its monopoly zone plan, L.A.'s city council speaker admitted that, quote, "On this one, we did not project accurately what was going to occur. If we could have done a deeper dive, we might have looked at doing a pilot project first. Sometimes we get things wrong. I'm not ashamed to say that I was wrong on this one", unquote.

As in L.A., the plans verified DSNY's significant in its sweeping nature for a city three times the size of L.A., significantly more complex and demanding. The proposed restructuring of the commercial waste system from an open market to zones and city-selected service providers raises the central

1
2 issues that will impact the city for
3 decades to come and affect nearly every
4 business, as well as the industry.

5 Further, confusing the public is
6 whether the plan for a system of several
7 haulers in each zone will be replaced by
8 a monopoly zone plan or choice in
9 advocates. Both are problematic. The
10 multi-hauler zone system is
11 unprecedented and untested, while the
12 exclusive hauler zone continues to be
13 rejected because of the severe risk it
14 entails by restricting choice and
15 competition.

16 We look forward to presenting our
17 comments that will address nearly every
18 aspect of the GEIS, whether it includes
19 and asserts, whether it omits
20 intentionally or otherwise, and what
21 additional analyses should be pursued
22 and presented as the final GEIS is
23 prepared.

24 Finally, contrary to media reports,
25 New Yorkers for Responsible Waste

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Management and other business and industry groups supports the City's pivot to a new set of goals that go beyond, and in some important ways, change the City's current goals.

Our disagreement is primarily about the means of pursuing those goals. To that end our comments will be consistent with those expressed in the City's initial decision in 2016, to proceed with a zone plan that is ill-advised will not service the City's best interest. It will have significant and intended and unattended consequences that represent substantial and unwarranted risk for the city's business and the industry that serves it.

Instead of meeting with other stakeholders, I have heard repeatedly that the plan should be reconsidered in the favor of considering alternative approaches that address and achieve the City's goals sooner, better and cheaper than the zone franchises plan proposed

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by DSNY.

Thank you for considering this statement.

MR. ARIAS: Good evening. My name is Joe Arias, I am a Teamster Local 813 member and driver of Waste Connections. Anyone who is paying attention can tell that there are a lot of bad companies in this industry. Last year, a wheel flew off a garbage truck on the Bronx Expressway and killed another driver. That doesn't happen by accident. It happens when companies don't take care of its trucks.

I had another company -- one driver ran over and killed two people in six months. The first one, they said, was a homeless person, but it turned out to be a worker. That doesn't happen by accident. It happens when a company doesn't care about safety or honesty.

I work -- I work at one of the good companies. I work at Waste Connections. We make a good wage, we drive new

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trucks, we get all the equipment we need to work safely. We work a normal, five-day work week, everyday we are reviewing safety practices.

How is a good company like Waste Connections supposed to compete with companies with low wages and bad safety?

How are they supposed to compete with Five Stars and Century Waste and the Liberty Ashes of the industry?

We need waste zones to hold all these companies to the same standard. The carters shouldn't compete on service, they should compete on recycling. They shouldn't compete on paying their workers less. Please set a high standard; one carter in each zone, high wages, real safety. Thank you.

MR. BRAUTIGAM: Thank you. Our next folks up are Ramses Dukes, followed by Tok Michelle Oyewole, and Ron Bergamini.

MR. DUKES: Good evening. So I'm going to be reading an excerpt from a contract that the Department of

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Sanitation has with Sam's Municipal Recycling.

So public employees responsible for the expenditures of taxpayer dollars have a responsibility to ensure that their conduct will not violate the public trust placed in them. To this end, public employees and elected officials having responsibility for contracting at all levels shall encourage competition, prevent favoritism and obtain the best value in the interest of the City and the taxpayers, place professional responsibilities above personal interests, and deal with the public and with the vendors with courtesy, consideration and even handings; use information gained confidentially in the performance of the City's duties solely in the City's interests, and report corruption and unethical practice, wherever and whenever discovered to the appropriate official and/or take such

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other action as is warranted by the situation.

With that being said, there's a larger issue and there's a larger, more nuanced issue at hand in the city and the state's management apparatus. It is imperative that we look beyond the basic improvements to our existing waste system; one that includes laws and regulations that reflect more -- a move toward a circular economy, supported by implementation and enforcement of extended producer responsibility.

For too long, the waste system has disproportionately affected poor communities of color in urban areas, environmental rural ecosystems with expansion of landfill usage. China's national source policy only ensures that our waste burden will increase, and organizations are prone to profit from -- from the City and State's weak waste management systems and programs.

With that being said, the evolution

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of law should not be hindered by private industries on the basis of profit or rent-seeking corporations. Over that, of the betterment of society.

Now, there's a lot of individuals in here who don't have this burden because when a waste transfer station is -- when it's decided to be placed, they don't look at Brooklyn Heights, Upper East Side, Upper West Side. They come to our communities. They put incinerators in our communities. They go up north and they put landfills, and already in -- in farmlands, where we could be using that for agriculture means.

So I think moving forward, we need to -- we need better solutions, and we need to actually take into account what, you know, local union organizers need and what the people and citizens actually need and not simply for profit. A lot of you guys are here for profit, and this isn't a sustaining system. So thank you.

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MS. OYEWOLE: Good evening. My name is Tok Michelle Oyewole, and I'm testifying on behalf of the New York City Environmental Justice Alliance.

Founded in 1991, the New York City Environmental Justice Alliance or NEJA is a non-profit, citywide-membership network linking grassroot organizations from low-income neighborhoods and communities of color and in our fight for environmental justice.

For decades, NEJA has led efforts for comprehensive policy reforms to address the disproportionate burden of New York City's solid waste systems on a handful of environmental justice communities.

To handle the nearly 35,000 tons of garbage generated each day in New York City, waste trucks needlessly travel thousands of miles per night through multiple boroughs of New York City, polluting our air with diesel fuel, clogging our streets and diminishing our

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quality of life. The impacts are greatest in low -- in low income and communities of color, where truck-dependent transfer stations are clustered, causing higher proportions of health consequences, such as asthma, heart disease and cancer.

We have reviewed the Draft GEIS of the commercial waste zone planning assessment. We are overall pleased that it confirms what we have been saying all along, that the commercial waste collection system is inefficient, and an exclusive-zoning system would result in the greatest possible reductions in air pollution, greenhouse-gas emissions, road damage and noise by taking miles of truck traffic and excessive vehicle pollution off of our streets.

We are also particularly pleased that the request-for-proposal process can incentivize cleaner waste-truck fleets by mandating compliance with existing laws, such as 2007's EPA

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standards for vehicles, could incentivize -- could incentivize better labor standards for workers, safety standards for the pedestrians and cyclists, and transparency and price reductions -- price benefits for customers.

While our passage of the Waste Equity Bill last year was instrumental in ensuring some reductions in permitted waste capacity in overburdened neighborhoods in North Brooklyn to South Bronx and Southeast Queens, we have recommendations for the commercial waste zone proposal, in light of the findings that would improve its achievement of stated goals within EJ communities and the city as the whole.

Vehicle miles traveled. Although the exclusive zone proposal outlined in Chapter 9 of the Draft Environmental Impact Statement is likely to result in decreased vehicle miles traveled throughout the city, due to clustering

1
2 of waste transfer stations and truck
3 depots, certain neighborhoods, which
4 have already had historically higher
5 burdens will see much lower reductions
6 than others. We recommend the bill
7 address the following: Geographic
8 proximity. The commercial waste zone
9 bill should ensure reduction in vehicle
10 miles for overburdened communities by
11 incentivizing waste transport to
12 transport stations geographically close
13 to the zone. This may include the
14 marine transportation, which, while more
15 costly to tip in, are equitably
16 distributed throughout the city,
17 well-run, and have the capacity to
18 displace even more vehicle miles from
19 the round trip export of waste, or
20 vehicle miles from 48 long-haul, diesel
21 trucks per barge.

22 We encourage the inclusion of
23 geographic proximity to transfer
24 stations and marine transportations
25 within the bill and RFP process. And we

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2 must keep in mind that Manhattan does
3 not host any land-based transportation,
4 only in marine transportations, which
5 are under-utilized. Meaning, their
6 waste from Manhattan is exported out of
7 borough in communities under the current
8 system. We also propose that the bill
9 subsidizes those tips into well --
10 well-run, more efficient MTS's.

11 Consortiums and subcontracts. We
12 are concerned with the proposal that
13 operators awarded a zone will be able to
14 form consortiums and subcontract with
15 other types of haulers without any
16 specified limits. If subcontracts are
17 allowed and encouraged within each zone,
18 they should be limited in number,
19 specified in detail within the RFP
20 beforehand, and should prioritize
21 subcontractors using at least the same
22 standards for the main carters, less
23 functioning of the CWZ bill, negated
24 stated goals, and increased vehicle
25 miles.

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We encourage RFC to reward women and people of color in this primarily male industry by hiring MWPE's in primary and subcontracts.

Long-term contracts with facilities. Incentivizing commission of RFPs with proposed contracts between haulers and the most proximate waste transfer station would provide the added benefit of ensuring the amount of waste that flows to transfer stations, and allowing them to -- the ability to plan ahead and make infrastructural improvement.

Study overburden districts. While we are pleased about and agree with the overall projection of the VMT reduction based on three representative case study zones, we recommend that subsequent studies specifically quantify the vehicle-mile reduction in the three neighborhoods receiving 75 percent of the City's waste to ensure that they receive a fair share of reduction of vehicle miles.

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2 Truck depots. Future studies
3 regarding vehicle-mile reductions should
4 analyze, and aim to reduce the effects
5 of clustering of waste truck depots or
6 vehicle miles traveled in neighborhoods,
7 considering the added miles from origin
8 and return to neighborhoods with these
9 truck depots or garages.

10 Okay. I have a bit more that I'll
11 submit a written comment, but I'll just
12 summarize.

13 Monitoring. We encourage truck
14 counts and mileage trackers for haulers
15 and subcontractors to ensure that VMT's
16 are actually reducing VMT's, where on
17 some corners, such as in the South
18 Bronx, as Fernando stated, at a
19 particularly bad corner of -- 304 trucks
20 go by per hour, 45 percent of which are
21 waste trucks.

22 Secondly, as a broad category, we
23 recommend regulating disposal facilities
24 and improving landfill diversion.
25 Again, we want to reiterate that the

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fill should not leave the facility for waste and for processing and export.

Likewise, we want local benefits of increased diversion from landfills to include less processing of waste in our community, which must be informed by fair-share principles to avoid the clustering of composting or recycling, once again, in EJ communities. The bill should protect EJ communities and workers, because of the disproportionate siting of waste facilities in low-income communities of color. The new zone system should ensure that poorly-sited facilities with a history of violations must not be permitted to handle our city's waste. The City should ensure that the transfer, recycling and compost facilities are required to meet the same basic labor standards as the carters.

Prioritizing collective facility oversight. The same oversight over carters the system promises should apply to facilities. Communities of color

1
2 should not have to deal with the noise,
3 pollution and disruption of
4 poorly-operated waste facilities.

5 Incentivize diversion. The EIS
6 proposes not to invest more into
7 construction of facilities means that
8 micro haulers carting organic waste, who
9 sometimes do so with bike, if you do not
10 add greenhouse gases or air pollutant
11 emissions, do not have a guaranteed
12 place to scale up this sustainable work.
13 The bill has the opportunity to
14 prioritize existing or new
15 infrastructure for this work.

16 Relatedly, the RFP process has the
17 opportunity to increase the miles,
18 organic or recycling diversion goals
19 stated within the GEIS to being more on
20 par with West Coast cities that have
21 implemented zoning and more aligned with
22 NYC goals of reaching clear waste by
23 2030.

24 And finally, increase education and
25 regulation regarding separation, along

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the waste chain. This includes the customers, carters and the facilities.

Lastly, we suggest that the waste -- the waste allocated in the proposal, 40 percent for a carting fee, is perhaps too high of a proportion. And that reasonable and standardized rates for customers based on the amount of waste they produced be mandated, rather than weighing this way in the RFP. So that way, it can be allocated to the elements mentioned above. Thank you.

MR. BERGAMINI: Thank you. My name is Ron Bergamini. I'm the CEO of Action Environmental Group, the parent company of Action Carters, which is New York City's largest hauler of solid waste recyclables.

We will be submitting a substantive written comment on the Draft Environmental Impact Statement. But today, I want to just comment on a single topic, and that's the choice between a single hauler and a

1
2 multiple-hauler zone. The two choices
3 action strongly supports the single
4 model. The single model provides the
5 greatest reduction of VMT's, safe
6 operations, the highest potential for
7 recycling, clearest accountability,
8 easiest integration with other city
9 services and fair pricing. The
10 alternatives are multiple. The multiple
11 model compromises these goals. These
12 options are no better than what we have
13 today and, in effect, create a 20 many
14 -- minutes meet.

15 Achievement of the City's
16 environmental and safety goals is
17 directly correlated with reduction in
18 VMT's. Maximum Reduction of VMT's can
19 only be achieved by the single model.
20 As the Draft GEIS shows, multiple model
21 pays a huge pricing, naturally, while
22 the single is far more efficient.

23 Publically, these will be created in
24 a single model. Fewer miles driven,
25 presumably results in fewer accidents.

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The single hauler will be a more efficient recycler. More efficient routes, far easier to schedule, and will enhance the identification, separation and collection of recyclables. For example, different days could focus on different waste streams, recycling streams.

The single model is also most integrated with other city service. A single hauler allows for a one-call system that consists of police and emergencies, and handle the streets better, such as when you have parades, street fairs, street closings, responsibility of complaints to address traffic, construction and slow delivery. Here's one potential example. We can arrange the garbage trucks out of the theater district on Wednesday night.

Single haulers will have the most transparent pricing, function in many ways like a utility. The hauler will be selected through a very competitive

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process, while price will be the determinative factor. Meanwhile, certainties of the entire zone will provide that hauler with economies of scale for important investments like cleaner fleets, worker safety, training programs, and customer service.

The single model will enable programs and policy, but not of their own workmen, all team scenario. Particularly, with emerging innovative, new ways to increase recycling diversion and better managed centralized than what's on the street. These innovations will improve neighborhood quality of life. Action, for example, along with the rest of the industry, has begun to use an advanced system to plan and manage routes in realtime.

A single hauler assigned to a single zone, and using these advanced techniques will reduce the total miles to a absolute minimum, reduce accidents, enhance efficiency and keep prices fair.

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2 The successful franchises exist
3 throughout the United States in a wide
4 variety of urban markets. All
5 successful zones -- franchise zones
6 follow a single-hauler model. They're
7 including foreign services, they meet
8 standards based on competitive,
9 transparent and well-defined pricing.

10 The city's RFP process offering a
11 single model, which ensures local and
12 international interest from experienced,
13 well-capitalized operations intend on
14 offering highly-competitive pricing.
15 Everyone will be playing to win. The
16 competition will be fierce, particularly
17 the -- regarding service, sustainability
18 and safety.

19 Action supports and advocates
20 continued innovation in our industry.
21 Safety collecting and disposing of waste
22 throughout the City is a great
23 responsibility. Those who do the hard
24 work each and every night through all
25 sorts of weather must be allowed to do

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so professionally, with fair wages, and with an appropriate, ordered work environment.

We're proud to be part of this discussion and remained committed to the City of New York, sharing its stated goals of best service, sustainability and above all safety. If the City determines that it is necessary to implement a zoning plan to achieve its goals of best service, sustainability safety, then let's do it right. Let's do it with a single-hauler system. Thank you.

MR. BRAUTIGAM: Are there others who still want to speak? I've got a few more cards here, but if you haven't yet -- so fill out a card with your name. They're at the table at the entry area.

The next three names I've got are Chilo Valerio-Gonzalez, Brendan Sexton, and Jose Garcia.

MS. VALERIO-GONZALEZ: Thank you for providing the opportunity to testify. I

1
2 personally want to thank the Department
3 of Sanitation for putting forward a
4 study that further shows that -- the
5 urgent need to reform the private waste
6 industry. The Draft GEIS incentivizes
7 and clearly shows that we benefit from
8 the benefits from a zone system, and
9 further affirms that the best way to
10 reach an affirmative industry is to
11 exhibit a decent waste zone system.
12 We're excited about the prospect of a
13 single legislation that can protect
14 workers and communities with high labor
15 and environmental standards for workers,
16 facilities and communities.

17 I want to talk to you a little bit
18 about the current system, and the hidden
19 costs that are happening and know that
20 this is by design. It's really
21 interesting to me that a study was
22 recently released saying that while we
23 know that people of color hold the
24 burden of the pollution through, you
25 know, health and other risks, it is

1
2 usually white people that produce the
3 most waste. And that is by design. It
4 is not like there is some random thing
5 that happened, where white people
6 benefit from producing waste and people
7 of color bear the burden of this waste.
8 And so because of this by design, we
9 have a real opportunity today, and in
10 the future to reform this industry to
11 design it so that it works for most
12 people of color and not just a few.

13 And I want to address the urgency
14 that we have. It is mind-boggling to me
15 that we sit here and say that this
16 system is fine, and that we have to just
17 think about safety. As a mother of a
18 three-year old and an upcoming new baby,
19 how can we sit here and not think about
20 the global crisis that we have with
21 climate change?

22 How do we sit here and say that
23 everything will be fine, we don't need
24 reform, we just need to have some kind
25 of safety? And I think that the reason

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why some of the individuals are able to say this is because they can get in their car, and go back to the suburbs and not see that our -- how our kids are living with asthma, are living with really -- you know, increased heart rate -- heart disease and other symptoms that comes with pollution.

So, you know, right now, we have a system that the business is generated from four -- three to seven million tons of solid waste each year, and it is highly polluting, it is -- hundreds of companies employ over 4,000 dirty trucks to collect waste along criss-crossing routes. They're making -- this is the pollution that damages the public health, and the vast majority of waste is transported by heavy trucks and -- by heavy trucks to and from waste transportation in a handful of low-income communities of color in North Brooklyn, South Bronx and Southeast Queens, which suffer negative health

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impacts as a result.

Currently, there's little-to-no oversight or accountability or transparency in this current system. While talking to small -- with small-business owners, who found out that in the past couple of months, people get extremely fined -- so if, for example, a carter decides that they want to change the schedule, then the small business is the one that gets fined.

Talking to a particular business owner, she told me that she has received three fines of upwards of \$200 in one single month. We know that small businesses get charged 38 percent more than large businesses, and they don't have a single contract with the -- contract with the waste hauler. This leaves the small businesses at the whim of the hauler with respect to price increases and recycling services provided, and also the pricing from the protection in event that the services

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are substandard.

Wage stack is also a very huge problem for this industry, especially for low-wage workers. According to a study conducted by the Economic Policy Institute, wage stack is a nationwide epidemic that costs American workers as much as \$50 billion dollars a year. This goes hand-in-hand with what we'll hear today, and what we have heard workers say time and time again. Workers at sanitation salvage, for example, reported that they were making \$80 per shift and sometimes working as many as 21 hours. This means that the workers were getting paid as little as \$3.81 an hour. Let that stink in. It is by design that most of these workers are also black and Latino, undocumented or formerly incarcerated. We have to do something to change the system.

It doesn't have to be this way, though. Through an exclusive zone system, we can ensure that our

1
2 communities, workers and small business
3 do not continue to pay for the hidden
4 cost of this broken system. Through an
5 exclusive zone system, we will bring
6 about the greatest reductions of miles
7 traveled and a reduction of emissions;
8 we will have fair wage, transparency for
9 small businesses; the city will have
10 leverage to demand high-labor standards,
11 worker safety and a real opportunity to
12 make second-chance jobs meaningful.

13 We have an opportunity that comes
14 once in a lifetime to transform our
15 city. We do not have a lot of time.
16 Twelve years is not a lot of time. We
17 urge you to do everything in your power
18 to ensure that New York City is the
19 leader in the green initiative, and this
20 must mean that we unapologetically adopt
21 aggressive measures to protect our
22 future. Thank you.

23 MR. SEXTON. My name is Brendan
24 Sexton, and I'm a retiree from the
25 Sanitation Department, but I'm here

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tonight to represent the Manhattan Solid Waste Advisory Board.

I think that in the just -- in the interest of time, invariably, I should say that much of the testimony already given is really excellent. I'll give a copy of my testimony, but I -- the SWAB has for several years -- in fact, for years before the release of the Draft GEIS -- has supported the notion of franchising, as it was once called, or a zone system for New York's commercial waste.

The excellent presentations by the representatives of environmental justice organizations, for instance, and others have concentrated or focused on the question of reducing diesel-truck traffic in the neighborhoods where our people live. This is an especially important interest of mine because I used to run the largest diesel refuse fleet in New York City, and I have a child who is diagnosed with asthma. I'm

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sorry. So our support for this plan is very strong, indeed.

We do know that there is a -- something of a controversy over whether there should be an exclusive carter in each zone, or there should be multiple carters in each zone. We do think that there are benefits of having exclusive carters, so you know who to hold responsible; but SWAB has considered to put subcontracts on streams with some parts of the zone that -- that -- that winner of the zone could subcontract some parts of the zone or some parts of the waste stream, especially recyclables, as long as the standards are held to apply to everybody operating. That is, the vehicle miles traveled standard, that's labor safety and the various civic standards, especially waste diversions.

All of these can be guaranteed and the responsibility enforced against the single winner in a zone or the major

1
2 winner in a zone subcontracting with
3 division should be possible. With those
4 kinds of details worked out, as I'm sure
5 they will be over the next few weeks, we
6 do strongly support the notion advanced
7 by the Department, by the City that
8 commercial waste zones should be
9 established and that, in particular, the
10 bidding process should include -- the
11 bidding process -- the selection process
12 should include waste diversion goals as
13 a chief goal -- qualification for
14 winning a contract, as well as, of
15 course, customer protection, price
16 protection and community protection.

17 But primarily, the SWAB is here to
18 commend the Department for proceeding
19 this way and to offer our help in any
20 way we can to see that it succeeds.
21 Thank you.

22 MR. BRAUTIGAM: Thank you.

23 MR. GARCIA: Good evening. My name
24 is Jose Garcia, and I'm a driver at
25 Rizzo, and I am also a member of

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Teamsters Local 813. I'm here tonight because I want my brothers and sisters in the private-carting industry to have safety and good pay, so that they can take care of their families.

At many sanitation companies, workers are put in danger on the job. They work too many hours, their paycheck is not enough to live in New York City. There are many companies that workers aren't getting paid overtime. There are companies, where workers are hired off the street and sent to work with just the clothes on their back. There are companies that don't maintain their trucks, and put everyone on the road in danger. There are also companies that don't -- Oh, I'm sorry. There are companies that don't maintain their trucks, and put everyone on the road in danger. It's got to change. New York City has got to fix this industry.

The Teamsters are calling for one private carter in every zone of the

1
2 city. It will mean that workers can
3 work safer, it will mean that the
4 industry will be more efficient, and we
5 will be able to provide a better service
6 for a better price. It will also mean
7 that the Sanitation Department can
8 finally hold the bad carters
9 accountable. If a company doesn't take
10 safety seriously, they shouldn't be in
11 business. Thank you.

12 MR. BRAUTIGAM: Next speakers will
13 be Suany Velez, followed by Leslie
14 Velasquez, and Rodney Hawkins.

15 MS. VELEZ: Good evening, everyone.
16 My name is Suany Velez, representing the
17 Real Estate Board of New York. As the
18 city's leading real estate trade
19 association representing residential,
20 commercial and institutional property
21 owners, law makers, investors, brokers,
22 sales people and other organizations and
23 individuals active in New York City real
24 estate, the Real Estate Board
25 appreciates the opportunity to provide

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comments on the DGEIS for the Commercial Waste Zone Program.

The REB agrees with the Department of Sanitation, that there is a need for an safe-and-efficient, waste-collection system throughout the city. The Commercial Waste Zone Program, however, contemplates a significant restructuring of how commercial waste is collected throughout the city. And the DGEIS does not adequately evaluate the impact this proposal will have on large commercial-property owners, who already operate efficient waste collection systems.

Owners of relatively large commercial properties manage waste differently than small businesses, who place a few bags of trash out on the curb when they close up shop for the day. Large commercial building owners typically contract with up to three private haulers to collect and manage waste for their entire building

1
2 portfolios. And they work closely with
3 haulers to determine any adjustments in
4 service needs, coordinate pick-up times
5 or request additional pick ups, if
6 necessary. Owners gain significant
7 benefits, including better pricing,
8 operational efficiencies because of
9 their ability to manage waste-collection
10 operations across their entire building
11 portfolios.

12 The level of service to manage waste
13 at large buildings is significant. For
14 many large commercial buildings, service
15 pickups can only happen during a very
16 limited amount of time. And any
17 breakdown in that process can
18 dramatically impact the daily operation
19 of the entire building. For that
20 reason, when a hauler is not able to
21 meet an owner's needs, the owner may
22 change haulers by shopping for services
23 from the best pool of service firms.
24 Large commercial properties are also
25 unique, in that they may produce enough

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waste for fill an entire packer truck in any one trip. Alternatively, haulers may followup the same truck with two or more buildings in a single owner's portfolio, depending on geographic proximity before going directly back to the transfer station.

Further, many of the City's largest buildings deposit their waste in a trash compactor that the hauling companies will pick up and take directly to the transfer station without serving any other building along the way.

This efficient, economical and environmentally-sound method of waste hauling for large buildings would no longer be possible under the DSNY's zone program proposal.

The imposition of a commercial waste zone system would unduly restrict the large building owner's choice as to who they do business with, and, thereby, diminish its ability to ensure efficient service and compliance with

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environmental standards in a cost-competitive manner. This is especially true for buildings that use compactors or fill an entire packer truck, given that those routes can never be environmental efficient than they are today.

The DGEIS has, therefore, failed to consider how limiting the number of waste haulers available to serve large commercial buildings would raise costs of delivering environmental benefits to the city. Consequently, the FDIS must include a detailed analysis of the potential for a zone proposal -- for the zone proposal to have detrimental impacts upon large building owners, as well as consider the potential for significant adverse impacts, if the zone system cannot properly service the needs of customers for waste hauling services.

Thanks for the opportunity to address you.

MR. BRAUTIGAM: Is there anyone else

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who still wants to speak, and hasn't filled out a card should be at the back table there?

MS. VELASQUEZ: I'm Leslie Velasquez. I manage environmental justice programs at Hyundai. We're an -- community-based organization founded in 1982. We serve the low-income communities of color of Williamsburg South Side, and Bushwick. Like many historically, low-income communities of color, South Side Williamsburg and Bushwick are environmental justice communities and traffic from waste transfer stations is one of the risks that unfairly affects communities like ours. In fact, North Brooklyn is disproportionately one of the most waste-burdened communities in New York City and bring 40 percent of the city's total waste.

Traffic from highly polluting trucks to and from nearby waste transfer stations contribute to the extremely

1
2 poor-air quality in our neighborhoods.
3 In an authentic study on air quality in
4 our neighborhood parks, we found that
5 all parks have peaked PM2.5 levels four
6 to six times higher than the maximum
7 level recommended by National Air
8 Quality Standards. This degree of air
9 pollution, of course, has serious
10 consequences. In the Lynford, Bushwick
11 area, asthma rates are twice as high as
12 the overall rates for Brooklyn and New
13 York City, and air pollution also causes
14 many other respiratory and psychological
15 diseases and even cancer. This is why
16 our organization supports community
17 waste zones and its Environmental Impact
18 Statement.

19 Like my fellow New York city
20 Environmental Justice Alliance members,
21 upon this the -- study that this GEIS
22 confirms, that our current commercial
23 waste collection system is inefficient
24 and harmful, and that exclusive zoning
25 would reduce air and noise pollution by

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taking excessive truck traffic off the streets.

Additionally, exclusive zoning as written within the Draft GEIS could further improve air quality by ensuring compliance with the 2007 EPA standards for truck fleets, and promote and enhance labor standards for workers, safety standards for pedestrians and cyclists, and transparency for customers. We strongly urge that this legislation -- for the communities ensure reduction in truck traffic by encouraging that waste be transferred into transfer stations located close to the waste collection zones.

Furthermore, we support the incentivization of commercial waste haulers to secure and utilize nearby transfer stations, which are equitably distributed throughout the city, and have the ability to replace the equivalent of vehicle miles from 58 long-haul diesel trucks. These

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stipulations would result in dramatic reductions in PM2.5 pollution -- a pollutant which causes asthma and other respiratory diseases, as previously mentioned.

We also encourage truck-count monitoring to ensure that truck traffic is actually reduced in communities like ours, where in some locations, we have counted 203 trucks per hour, 30 percent of which are waste trucks.

Air-quality monitoring should also be done post-implementation to study the effects of this policy, and ensure that it's effective. We would be for introduction of this bill, and considering the fight for waste equity and environmental justice for our communities and communities like ours. Thank you.

MR. HAWKINS: How are you doing? My name is Rodney Hawkins, I work for -- I'm a driver for Waste Connection and also an 813 Teamster driver.

1
2 I've been in this industry almost 30
3 years. I'm a second generation in this
4 business. The waste zoning is good for
5 the city. It cuts down on vehicle
6 traffic, commercial traffic in a
7 high-traffic city, especially at night
8 when we work. Some of the companies out
9 there in this industry are -- drive
10 crazy, we all see that on the news
11 report and everything. And we all know
12 a lot of companies out there run 100
13 miles. They run from Brooklyn, Queens,
14 Manhattan and Bronx.

15 We got 50 different carter companies
16 out there in the neighborhood picking up
17 traffic. Trucks being out all night.
18 That's not the -- how the Department of
19 Sanitation works. They do their zone
20 and that's it. The guys go home for an
21 eight-hour shift. It should be one
22 company zone. It should be the same
23 truck picking up the trash for each
24 business on the block, and take -- my
25 company would take safety very

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seriously. We go through trainings everyday, we watch videos, we wear the colors that we need to wear out there in the streets and everything. We make sure the workers get training, workers get equipped, and workers have the time to drive safe. Please clean up the industry. Thank you.

MR. BRAUTIGAM: Thank you. Okay. Is there anyone else who would like to offer comments? That's all the cards that I had handed to me. So anyone else?

If not, I think we can declare this hearing closed, and you have until April 8th to send in written comments. So thank you all for coming.

(Time Noted: 7:23 p.m.)

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C E R T I F I C A T E

STATE OF NEW YORK)

:ss

COUNTY OF NEW YORK)

I, TIFFANIE JONES, a Notary Public within
and for the State of New York, do hereby
certify:

That the witness whose examination is
hereinbefore set forth was duly sworn and that
such an examination is a true record of the
testimony given by such a witness.

I further certify that I am not related to
any of these parties to this action by blood or
marriage, and that I am not in any way
interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my
hand this 14th day of March, 2019.


Tiffanie Jones