

September 30, 2019

The New York City Council  
City Hall  
New York, NY 10007

Dear Council Members:

We write to you today about the future of one of our city's most overlooked but critical infrastructure issues: commercial waste collection. As a coalition of New Yorkers representing a range of industries and causes – from hospitality and health care to planning and environmental – we are deeply concerned with the commercial waste reform bill being proposed by the City Council.

We are encouraged that the City Council understands that the current commercial waste collection system needs an overhaul and are grateful for the leadership of Council Member Reynoso and many of his colleagues as they work to address this issue.

The Council's proposal to limit new zones to a single carrier, however, is misguided and would quickly lead to a drop in the level of collection service. That's because this legislation would remove one of the most important factors when it comes to commercial waste collection: the ability of property owners and businesses to choose a carter that can best meet their highly specialized needs. With sole control over a particular zone, carters would have no incentive to compete or improve the quality of their service.

But we don't need to guess what the consequences of this plan would be. In Los Angeles, which recently passed similar legislation, the quality of trash collection plummeted, and residents, workers and visitors quickly noticed. Mountains of trash formed on sidewalks and the smell of uncollected waste wafted into lobbies and entranceways. Knowing all this, why make the same mistake in New York?

This is not to say that we don't support the Council's goal to pass legislation that makes our commercial waste collection greener and safer. It's clear that on both fronts, our current system needs improvement.

But as with so many urban planning and policy issues, there must be a thoughtful middle ground. And we firmly believe the Council must find a way to balance environmental and pedestrian safety concerns with the need to maintain at least some flexibility – though not the free-for-all of today's system – when passing commercial waste reform legislation. All these important goals can and should be met.

We are eager to see the City Council tackle commercial waste reform and appreciate the attention to this issue. For more than three years, many of us have worked closely with the Department of Sanitation on commercial waste reform in good faith to create a plan that makes sense. The Council's bill should reflect that thorough engagement process. We implore you to consider a nuanced approach that will ensure a greener New York, a safer New York, and a New York that offers the choice necessary for a high level of commercial waste collection. Let's rework the proposed legislation before it's too late.

Sincerely,

Association for a Better New York  
BOMA New York  
Brooklyn Chamber of Commerce  
Bronx Chamber of Commerce  
Downtown Alliance  
Downtown Brooklyn Partnership  
East Midtown Partnership  
Fifth Avenue Association  
Flatiron/23<sup>rd</sup> Street Partnership  
Food Industry Alliance of New York State, Inc.  
Grand Central Partnership  
Hotel Association of New York City  
Hudson Yards Hell's Kitchen Alliance  
Lincoln Square BID  
Manhattan Chamber of Commerce  
National Supermarket Association  
NoHo BID  
NYC Hospitality Alliance  
NYS Restaurant Association  
Park Slope Fifth Avenue BID  
Partnership for New York City  
Queens Chamber of Commerce  
Real Estate Board of New York  
SoHo Broadway Initiative  
Staten Island Chamber of Commerce  
Union Square Partnership