



Testimony for March 3rd hearing, 2024 Hearing re. Intro 130, Preconsidered Bill, formerly Int 1100-2023

I am Clare Miflin, ED of the Center for Zero Waste Design and a member of the Save our Compost Coalition. I participated in the panel [What Happens to NYC's Organic Waste?](#), and the [Community Compost Teach-Ins](#). I have looked at how composting in Parks could take part citywide as part of our Put Waste to Work campaign, see [post](#).

I am strongly in support of composting Parks and NYCHA's yard waste, something that has been required of the Department of Sanitation by the city administrative code since 1989, and can be seen in section 16-308 sections b and c.

In 1997 a memorandum of understanding was signed between Parks and DSNY (see [appendix 2](#)) that *DSNY would collect leaves and yard waste from Parks, and Parks would provide lands for composting and needs compost for parkland enhancement*. This successful cooperation which led to the most extensive and successful community compost program in the US is now at risk of permanent elimination, with Parks not renewing leases for community compost organizations that were part of the NYC Compost Project, and DSNY cutting all funding for the Project.

To make this bill a success the collaboration between Parks and DSNY needs to be reinstated, Parks need to allow successful community composting projects which the community supports to continue on their lands, and NYC Compost Project needs to be refunded.

So we support this bill with the following modifications:

1. It is not feasible that DSNY establish new facilities abutting or near parks – that land is in many cases not available and would be prohibitively expensive. Instead this composting needs to happen primarily on Parks land, likely within maintenance areas or previously unutilized parks land (such as that used by Big Reuse under the Queensborough bridge). We would recommend “near or ~~abutting~~” language changed to “near or within”
2. Some of the 10 largest parks in each borough are boardwalks and beaches, natural areas, or parkway medians and not the most suitable for composting. We would suggest that there is a better way to determine the parks, for example those that produce the largest amount of yard waste, or largest turfed area, and therefore greatest need for compost. We also think that the requirement should be phased in, with a lesser number of parks by 2025 – possibly 1 or 2 in each borough.
3. The rule should require protection and continuing use of land by the successful community compost sites - Big Reuse sites in Gowanus and Queensbridge, Lower East Side site in Lower East Side and to be built in Canarsie, EarthMatter on Governors Island, Red Hook Farms, Queens Botanical Gardens, Snug Harbor Farm.

4. Language should be added for DSNY to be required to cooperate with community based organizations to operate the community composting sites, and to require food scraps to be part of the composting – this not only helps divert food scraps and engage community members, but it also allows for composting to be done faster, in a much smaller area of the Park, and to provide recreational and volunteer opportunities for New Yorkers.
5. We suggest that there could be a requirement or suggestion for the composting operations to engage and educate volunteers in composting and applying the resulting compost to street trees and parks, and to collaborate with green jobs training programs.

We thank CM Brewer for her leadership in drafting this bill, and look forward to working further on it.

For more information please see my opinion article written with Samantha MacBride, for more: [Don't Kill Community Composting in NYC](#)

I am very happy to discuss or expand on any of these ideas further,
Respectfully,

A handwritten signature in black ink that reads "Clare Miflin". The signature is written in a cursive, flowing style.

Clare Miflin,
Executive Director, Center for Zero Waste Design