Center for Zero Waste Design

DSNY Draft EIS Testimony

July 24, 2026

The Center for Zero Waste Design is a nonprofit organization that has researched best practices for waste containerization around the world, and advocated for NYC to containerize its waste for almost a decade.

While we are very happy that the Mamdani administration is moving forward on waste containerization, it is missing valuable opportunities to improve how it is done. DSNY's current plan is unchanged from the Adams administration, with its narrow aim of addressing rats and litter.

As a member of the Transition Committee, I know that the concerns of the Mamdani administration are much broader, and include zero waste, the economic health of small businesses, housing affordability, sustainable mobility, delivery infrastructure and the quality of life on NYC streets.

Waste containerization has a major effect on all of these aims, and I believe that institutionalizing DSNY's current plan would be a mistake. Instead I recommend a wider assessment of the impacts of the current plan, as well as the piloting of alternatives that promise greater benefits, and have been successfully rolled out in Hoboken, ahead of formalizing the Mamdani approach to Citywide containerization.

These are the issues we see with the Draft EIS:

1. ***Missing considerations:***

   This Draft EIS does not consider many negative impacts, chiefly:

   a. impacts of trash-only containerization on waste diversion rates.
   b. impacts of permanent and temporary bins on sidewalks to pedestrian mobility, sidewalk cleanliness, economic impacts to storefront businesses, and flooding events.
   c. Impacts on worker safety for building labor who will have to lift tons of bags 4' high into Empire Bins
   d. Costs for building owners, which are passed through to New Yorkers via rents or maintenance charges.

2. ***Lacks assessment criteria:***
   DSNY has not shared any data assessing the pilot performance for CD9, beyond a reduction in 311 rat complaints. The Draft EIS does not commit to studying impacts as the first few districts are rolled out, and using these to assess whether their approach should be changed as the program is rolled out. We believe the impacts should be studied and shared, and they should include:
   a. Diversion of recycling and compostable waste,
   b. Number of permanent and temporary bins obstructing sidewalks
   c. Amount of curb lane permanently and temporarily used for waste staging
   d. Impacts to both building and DSNY labor.
   e. Impacts of truck traffic
   f. Costs - to the city and to building owners

3. ***Inaccurately dismisses alternate waste containerization methods:***
   The draft EIS inaccurately dismisses the alternates we are advocating for:
   a. Shared on-street containers for all streams for small to medium buildings
   b. Temporary 4-wheeled bins for many large buildings with trash chutes
   c. Safety concerns around robotic-arm top-lifted containers

4. ***Considers current not future curb use:***
   The draft EIS measures the amount of current parking space available, without considering the future condition that is required of DOT per LL 195/2019 and NYC Streets Plan. As NYC reinvisions its public realm, embraces sustainable mobility, and adjusts to the increase in deliveries to residential buildings, it is short sighted to embark on a waste containerization program that looks at streets as they are now, not how NYC is planning them to be.

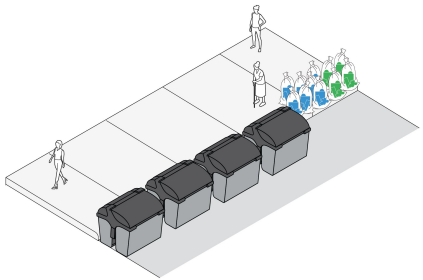
This is a program of unprecedented scale, ~70,000 Empire Bins and millions of individual bins to containerize all of the residential trash produced in the city. New Yorkers, especially those who care about economic justice, climate, and the city's budget, have a right to know the consequences of these changes. An EIS impact study is designed to measure the impacts of large new building developments, and is not well suited to measure the impacts of changes in waste and curb management. The CfZWD recommends DSNY commit in the FEIS to fully study the impacts of waste containerization as it is rolled out in Brooklyn CB2, as well as to pilot alternate containerization methods and evaluate them against their proposed methods. The results of these studies should be shared publicly and be used to assess the best ways to roll out containerization citywide.

As experts on waste management within buildings and waste collection practices in cities across the globe, we already know that DSNY's program is not designed for maximum public benefit. We worked on Hoboken's Zero Waste Plan, which was followed by a pilot of 4-wheeled bins attached directly to trash chutes for large buildings. This was successful and is being required municipality-wide.

We strongly suggest that DSNY pilot our strategies for large and small to medium buildings as part of the Brooklyn CB2 rollout, and evaluate them, while the opportunity is still available to align waste containerization with the Mamdani administration's goals.

See below and here for more information about our waste containerization pilots and the benefits they could bring!

DSNY is Containerizing Waste

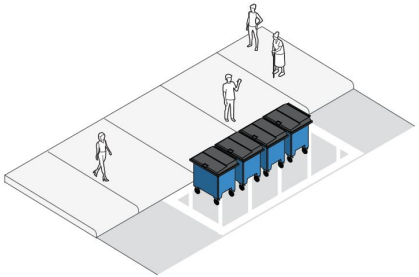


Reduce litter and rats
Bins and containers mitigate rats compared to leaky plastic bags.

What DSNY solves

We See An Opportunity for Additional Benefits

A holistic approach brings many more benefits

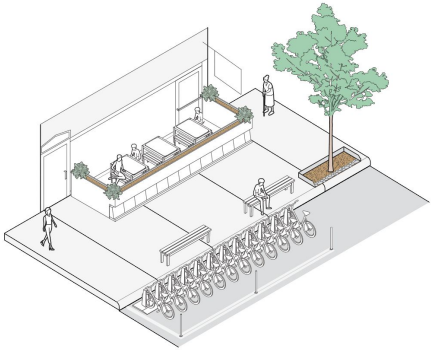


Reduce litter and rats

Bins and containers mitigate rats compared to leaky plastic bags.

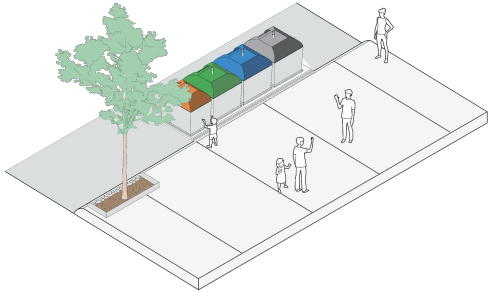
Reduce Costs for New Yorkers

An average of $75 / apartment / month is spent on managing waste



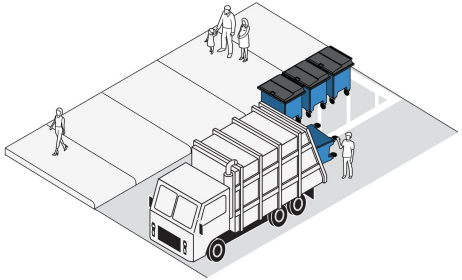
Renew vitality of streetscapes

Containerization that reclaims valuable public space and keeps sidewalks free for pedestrians and street life.



Help reach zero waste goals

Containerization that makes it equally convenient to dispose of trash, recycling and organic waste. Trash-only systems don't encourage residents to recycle.

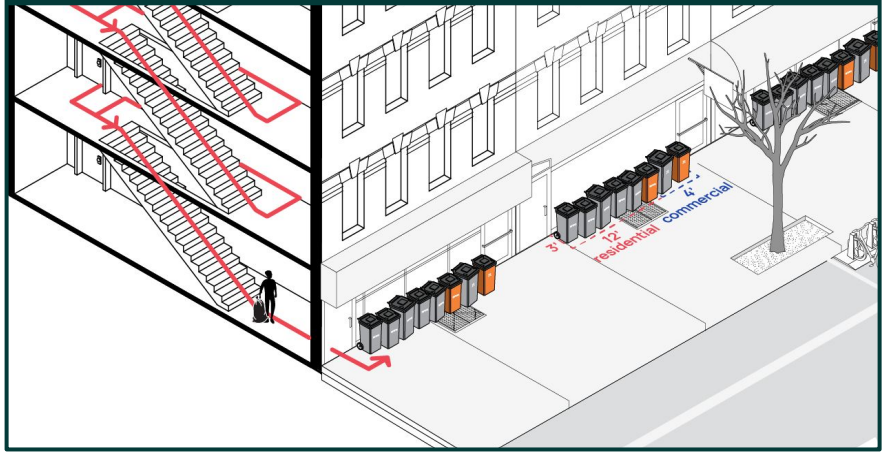


Improve worker safety

Using semi-automated collection will improve hygiene and ergonomics for sanitation workers. Using 4-wheeled bins means porters do not need to lift bags.

Solutions for Small-Medium Buildings

DSNY: Individual Bins



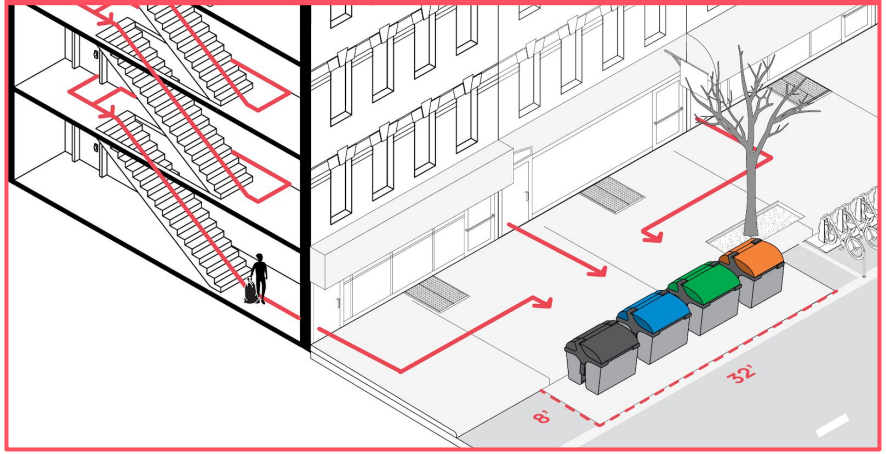
Benefits

No loss to parking spaces
No changes to collection

Challenges

Blocks pedestrian mobility
Detracts from storefronts
High labor for building staff
Time-consuming collection
Not ergonomic for DSNY
Illegal use of bins
Costs to building owners

CfZWD: Resident-Accessed On-Street Containers



Benefits

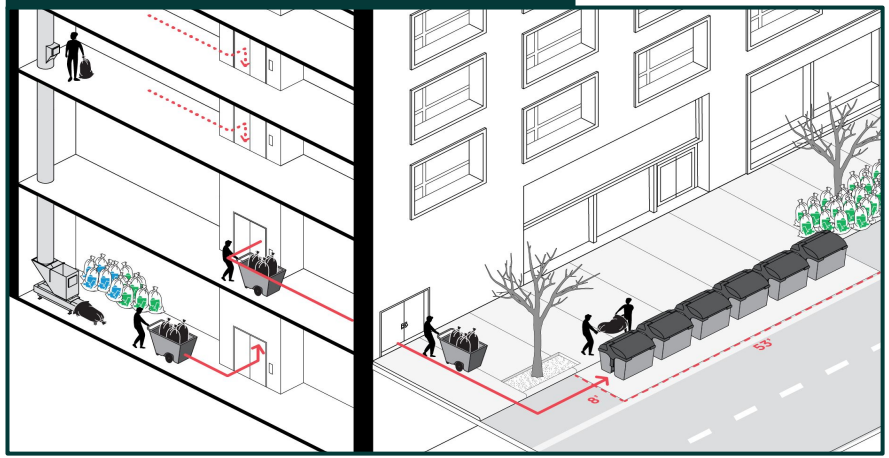
Increased waste diversion
Pedestrian-friendly
Improved storefronts
24/7 access for residents
Efficient, ergonomic collection
Reduced operating costs for buildings

Challenges

New trucks and collection schedules
Placement of on-street containers
Illegal use of containers
Costs to City for provision and maintenance
Loss of parking spaces

Solutions for Large Buildings

DSNY: Permanent On-Street Containers



Benefits

No changes required within the buildings

Challenges

Requires new trucks

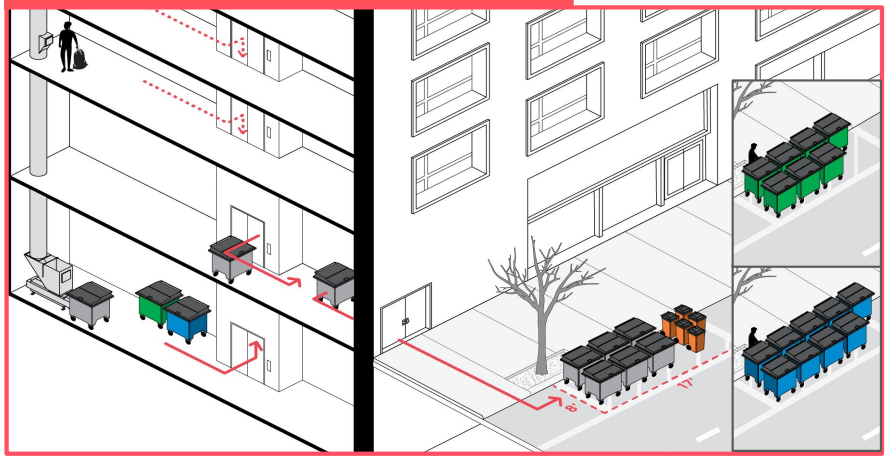
Permanently takes up curb space

High labor for building staff

Not feasible in many locations

Recycling bags still crowd sidewalks

CfZWD: Temporary 4-Wheeled Bins



Benefits

Increased waste diversion

Hygienic and ergonomic for building staff

Reduced operating costs

Temporary set-out, no permanent impact to streets

Can use existing DSNY rear-load trucks

Challenges

Coordinating placement on street

Requires retrofitting of interior compactors

Enforcement of illegal parking