

CITY OF NEW YORK
MANHATTAN COMMUNITY BOARD FOUR

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JESSICA CHAIT
Chair

JESSE R. BODINE
District Manager

February 11, 2025

Javier Lojan
Acting Commissioner
NYC Department of Sanitation
125 Worth Street
New York, NY 10013

Re: DSNY Proposed Rule Relating to Entities Engaged in Cleaning Services

Dear Acting Commissioner Lojan:

Manhattan Community Board 4 (MCB4) is concerned with some of the proposed language and subsequent aftereffects of amending Section 16-120(e)(2) of the New York City Administrative Code which prohibits the placement of household or commercial refuse, including upon any sidewalk, street or public place. While we appreciate the value and efforts of containerization, MCB4 is concerned that the Department of Sanitation's (DSNY) rule change would undermine the efforts of various neighborhood organizations helping to keep our streets clean.

By a Full Board vote of 42 in favor, 1 against, 0 abstentions and 1 present not eligible at its February 5th meeting, MCB4 requests language be removed specifically targeting "business improvement districts, merchant associations, neighborhood associations and other non-governmental organizations" who are performing cleaning services "such as manual sweeping and cleaning of sidewalks, public plazas, streets, curbs and gutters, or emptying of public litter baskets, for the purpose of supporting local business or communities."¹

Currently, our community district receives supplemental cleaning services from a variety of sources including Business Improvement Districts (Times Square Alliance, Garment District

¹ Quoted text comes from the [Notice of Public Hearing](#) for this proposed rule

Alliance, Hudson Yards/Hell's Kitchen Alliance, 34th Street Partnership, Meatpacking District and Flatiron/23rd Street Partnership), The Association of Community Employment Programs (ACE) and volunteer groups such as Litter Legion and local block associations.

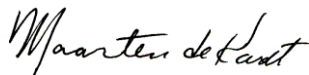
Instead of being allowed to leave filled bags next to public litter baskets for collection, under the proposed rule these entities will be required to place such materials in rigid receptacles with tight-fitting lids for collection by the Department. DSNY knows full well many of these non-profit and grassroots organizations have neither the physical capacity nor the funds to provide lidded receptacles for neighborhood cleanups. The irony is not lost that these organizations would not be necessary if DSNY was able to provide adequate service to keep our streets and curbsides clean and free of trash. With the potential penalty, the organizations augmenting the city's sanitation services will be dissuaded from their appreciated work.

MCB4 asks that the wording be modified to exclude volunteer and neighborhood organizations which are currently providing the district a valuable public benefit and more directly deal with the issue of abandoned bags. The cleaning of sidewalks, streets, curbs and gutters is not a service that the Department of Sanitation currently provides. We would like more clarity on the motivation for this proposed rule anticipating the adverse effects on hyperlocal clean up groups.

Sincerely,



Jessica Chait
Chair
Manhattan Community Board 4
Environment



Maarten de Kadt
Co-Chair
Waterfront, Parks & Environment
Committee



Leslie Boghosian Murphy
Co-Chair
Waterfront, Parks &
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