



**THE CITY OF NEW YORK
BRONX COMMUNITY BOARD 6**

1932 Arthur Avenue, Room 403-A, Bronx, NY 10457

Honorable Vanessa L. Gibson, Bronx Borough President

Honorable Oswald Feliz, New York City Council Member, 15th District

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MS. EVONNE CAPERS
Board Chairperson

MR. RAFAEL MOURE-PUNNETT
District Manager

February 19, 2025

Javier Lojan
Acting Commissioner
New York City Department of Sanitation

Re: Section 1, Chapter 1 of Title 16, RCNY, Section 1-12

Bronx Community Board 6 is home to two Business Improvement Districts, the Fordham and Belmont BIDs. Both BIDs have expressed concern with DSNY's rule to require BIDs to containerize trash or cart trash to Sanitation district stations. The Community Board is concerned that the upfront costs of new containers within each BID is an unfair burden on the BIDs, which are conducting supplemental services provided by DSNY. This upfront and continued maintenance cost may be prohibitive for BIDs. Siting these containers will take time to coordinate with DOT, and we are unsure if this coordination can be completed before the rule takes effect.

We ask that DSNY take on the upfront cost for additional containers to meet the needs of BIDs' supplemental trash services. The city should be supporting BIDs in their efforts to keep our communities clean, as they reduce the burden on DSNY staff. The current proposed rule risks forcing BIDs to cease all trash pickup services to protect themselves from the fines DSNY has imposed and the cost of new containers they may not be able to afford. If that is the result of this rule, DSNY will have created dirtier streets and sidewalks due to bureaucratic mismanagement of this rule's roll out.

In addition, it is unclear how community clean up events would work under this rule. Community Board 6 has often participated in community clean up events, and this rule creates logistical complications for trash disposal at community clean ups, in particular for organizations that don't know how to contact DSNY directly. Purchasing enough cans for these clean up events could become potentially cost-prohibitive and discourage groups from doing community clean up events. Again, the lack of guidance and consideration from DSNY on how this rule would take effect jeopardizes efforts from BIDs and community groups to support DSNY's work to keep our streets clean.

Regards,

Evonne Capers
Chair
Bronx Community Board 6

CC: Council Member Oswald Feliz
CC: DSNY Chief of Department and relevant Bureau Chiefs