



Statement of Adriana Espinoza
NYC Program Director
New York League of Conservation Voters
City Council Committee on Sanitation and Solid Waste Management
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Good morning. My name is Adriana Espinoza, and I am Director of the New York City Program at the New York League of Conservation Voters (NYLCV). NYLCV represents over 31,000 members in New York City, and we are committed to advancing a sustainability agenda that will make our people, our neighborhoods, and our economy healthier and more resilient. NYLCV would like to thank Chair Reynoso and members of the Committee on Sanitation and Solid Waste for holding this important hearing.

NYLCV strongly supports the City's plans to establish Commercial Waste Zones (CWZ) and we believe it can begin a transformational shift in our commercial waste management system from the glaringly inefficient and substandard system it is today towards a more sustainable future. This system can make our streets safer, our air cleaner, and bring us closer to the city's goal of zero waste to landfills by 2030 (0x30).

It is imperative that the enabling legislation, Intro 1574, is designed in a way that maximizes benefits to the environment. To that end, NYLCV will be advocating for its five top priorities for Intro 1574:

Waste Diversion

According to the draft generic environmental impact statement (DGEIS) prepared by the Department of Sanitation (DSNY), compared to current conditions, a commercial waste zone system is projected to lead to a 19% increase in the total diversion rate of waste from disposal to recycling. While this is encouraging, we could further increase this number by setting waste diversion goals for each zone. Having targets for each zone will promote local engagement to reach those goals, allow DSNY to track its progress, and help the city to reach its stated goal of 90% waste reduction by 2030.

A major roadblock to increasing the City's waste diversion rate is the lack of education. While the bill proposes allowing waste haulers to offer third party waste audits, which we support and could be very useful, it is also optional. Like residential customers, commercial customers need a robust public education on how to properly recycle. Businesses need to know both how to properly sort their waste and *why* they should. Without education that addresses both, we will not reach 0x30. Carters should also be directed to conduct consumer education as part of the CWZ system.



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Reduction of Vehicle Miles Traveled

We are encouraged by the potential 66% reduction in vehicle miles traveled (VMT) that DSNY projects will result from this plan, as less VMT means fewer emissions from diesel exhaust. The toxic cocktail of gases and particulates that come from diesel trucks have serious impacts on our climate and on public health. Impacts that are especially felt in environmental justice communities. In addition, less circuitous routes will result in more alert drivers, leading to fewer accidents and fatalities, which will help to achieve the City's Vision Zero goals.

NYLCV recommends that Intro 1574 look at all common sense solutions to reduce VMT, some of which are already mentioned in the bill, including rewarding zones based on proximity to waste transfer and processing facilities, incentives for using a WTS closest to their zone, and investing in trucks that can haul both recyclable and putrescible waste for even further efficiency.

Prioritization for Clean Fleets

We believe CWZ presents an opportunity to spur a more rapid transition towards clean vehicle technology. As of April 2019, approximately 62% of the commercial waste trucks in the city were compliant with LL145 of 2013. This figure is far too low for a 12 year old standard, and though LL145 is a step in the right direction and the potential 66% VMT reduction for zones is promising, waste trucks should be as low emissions as possible in order to reduce the amount of NOx and particulate matter in the air, especially since these vehicles often start and end their routes in environmental justice communities. While the VMT reduction will have measurable impacts citywide, CWZ will do little to move the needle on air quality in neighborhoods like North Brooklyn or the South Bronx unless the disproportionately high number of haulers housed in those communities invest in cleaner fleets.

Companies that are already making efforts to reduce the environmental impact of their trucks beyond the requirements of LL145 should be given extra credit during the RFP selection process. Since a major goal of the CWZ system the City has proposed is reducing air pollution, giving companies with cleaner fleets extra points will not only be a boon in EJ communities, but also allow the City to meet its GHG reduction goals faster while ensuring that the carters chosen have a genuine commitment to cleaner air for New York City.



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Green Jobs

The DGEIS estimates some loss in low and middle wage field jobs will accompany a move to CWZ, but an increase in jobs for recycling and organics collection and materials recovery facilities that outweighs the estimated loss. In addition to those, the CWZ program should also include a plan to increase the number of green jobs available in diversion sectors such

as food rescue, organics processing, and electronics recycling. Since a major goal of this system is protecting workers, Intro 1574 should also ensure that those who lose jobs as a result of this new system can find new ones in similar industries. That cannot be done without a plan and relevant training programs.

Support for Micro-Haulers

Under CWZ, we anticipate more businesses participating in recycling programs such as organics recycling, e-waste, or textile waste. While we want to encourage diverting this waste from landfills as much as possible, we know it is usually much lower volume and therefore not efficient to send out a large diesel truck for collection. For these reasons, the use of micro-haulers should be included explicitly in Intro 1574. Winning haulers should be encouraged to subcontract with these micro-haulers, which often operate with zero emissions vehicles (such as cargo bikes), to pick up smaller loads of recycled products with less frequency than a typical waste truck.

Some haulers might point out the cost of the above recommendations. However, the DGEIS showed that carters will save approximately \$46 million in operating costs as a result of the new zone routing efficiencies in this program. Some of those savings should be reinvested into cleaner engines, upgrading facilities to accommodate organic waste, customer education, and other practices that will reduce the environmental impact of the City's waste.

To conclude, Intro 1574 is a once in a generation opportunity to restructure an emissions intensive industry for the betterment of the environment, public health, and workers. NYLCV thanks Chair Reynoso and DSNY for their work on CWZ, look forward to advocating for the passage of this bill, and will continue to advocate for safer, more sustainable waste management systems in New York City.