New York City Environmental Justice Alliance
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On the ground – and at the table

October 15, 2026

New York City Environmental Justice Alliance's Testimony on Waste Equity and Environmental Justice

Good afternoon, Chair Sanchez and members of the Council. My name is Shravanthi Kanekal, and I'm the Senior Resiliency Planner at the New York City Environmental Justice Alliance (NYC-EJA). Founded in 1991, NYC-EJA is a non-profit citywide membership network linking 13 grassroots organizations from low-income neighborhoods and communities of color across all the 5 boroughs in their struggle for environmental justice. NYC-EJA is also a founding member of Transform Don't Trash (TDT), a longstanding coalition of environmental justice, labor, and climate organizations working to transform New York City's sprawling solid waste management systems to be far more equitable, efficient, sustainable, and safe for workers and the communities most affected by solid waste infrastructure.

NYC's current solid waste system is an ongoing environmental injustice in which 75% of the City's privately managed waste is still trucked in and out of just five community districts – which represent low-income communities and communities of color. The vast majority of this garbage generated by businesses and buildings citywide pass through communities with some of the highest rates of asthma such as North Brooklyn, the South Bronx, and Southeast Queens. Despite laws intended to change this, for years these communities of color have had to deal with far more than their fair share of heavy truck traffic, safety hazards, pollution, noise, and odor.

For this reason, **NYC-EJA strongly urges DSNY to implement the remaining zones as indicated in Local Law 199 of 2019, also known as the commercial waste zone law.** This would reduce both the number of trips and the lengths of collection routes for commercial waste, resulting in corresponding reductions in air pollutant emissions and noise, as well as improvements in traffic safety.

- The continued delay in the roll out of this program continues to disproportionately impact low income and communities of color by the private waste industry, while jeopardizing the health and safety of sanitation workers.
- The clear intent of this law is to simultaneously make the current inefficient, dangerous, and polluting commercial waste system far more transparent, accountable, efficient, and safe while giving the City the tools it needs to sharply incentivize reductions in the vast amounts of commercial waste disposed of in landfills and incinerators.
- We call on DSNY to fulfill the waste equity goals of the current 2006 SWMP by planning for designated haulers in these new zones to maximize use of marine and rail transfer

facilities and ensure that these facilities are competitively priced to incentivize haulers to utilize them. The CWZ system provides many opportunities to continue moving NYC towards its climate and equity goals including reducing VMT and pollution in communities with unfair concentrations of private truck based waste facilities - North Brooklyn, South Bronx, and Southeast Queens communities.

The 2026 Solid Waste Management Plan (SMWP) should fulfill the 2006 SWMP's strategy of using municipal marine transfer stations to accept commercial waste – a long standing demand of environmental justice communities. DSNY reports have estimated that full MTS implementation would decrease truck traffic associated with commercial waste collection by 50% citywide, as measured in vehicle miles traveled, reducing both the number of trips and the lengths of collection routes for commercial waste, resulting in corresponding reductions in air pollutant emissions and noise, as well as improvements in traffic safety. Despite an evaluation of accepting commercial waste at four MTS locations, DSNY permit and tonnage data shows that several MTS facilities still handle far less waste than their permits allow, ultimately delaying much needed relief to environmental justice communities.

- It is disappointing to see the lack of progress in fulfilling a commitment in the 2006 Solid Waste Management Plan to enable commercial haulers to export some waste via city-owned marine and rail transfer stations located near the zones where waste is generated and collected. One barge can replace nearly 96 trips of an 18 long-haul truck from driving through our communities.
- **We ask that the Council pass Int 367 (CM Nurse) at the earliest** - requiring the DSNY to accept and process commercial solid waste at all city-owned or operated marine and rail transfer stations, and to publicly report the amount and type of waste received at such stations on an annual basis.
- It's imperative that the 2026 SWMP considers GHG and co-pollutant reductions in disadvantaged communities to be consistent with State law. New York's Climate Leadership and Community Protection Act (CLCPA) passed in 2019 obligating state agencies and entities, including the Department of Environmental Conservation (DEC), to ensure that all agency actions are consistent with a 40% reduction in statewide GHG emissions by 2030 and to prevent or mitigate disproportionate environmental burdens on Disadvantaged Communities (DACs).

The City should cease expanding waste management solutions like anaerobic co-digestion at City Wastewater Resource Recovery Facilities (WRRFs) at the cost of expanding composting facilities across NYC, which could help establish green-jobs among other benefits.

- We are troubled to see continued investment in sending collected organics to be co-digested with sewage sludge at the Newtown Creek Wastewater Resource Recovery Facility. Collected gas from the anaerobic co-digestion process should only be used as a critical on-site energy source for operating the WRRFs, not for any other purposes. The problems of anaerobic co-digestion here in NYC include fugitive emissions, flaring of excess methane into the atmosphere and the perpetuation of fossil fuel infrastructure

piping gas into New Yorkers' homes as seen in the National Grid pilot project at Newtown Creek WRRF.

- **Community advocates from neighborhoods around the Newtown Creek WRRF have repeatedly raised concerns about the excessive flaring of excess unusable methane over the years.** It has taken National Grid and the City over 10 years to get this pilot project running and it raises serious concerns about the same technology being applied to the Hunts Point WRRF in the Bronx, a community that has been disproportionately burdened with air pollution.
- Municipal composting sites are necessary to process increasing amounts of food and yard waste separated by both residents and businesses as landmark curbside composting and commercial waste zones programs are fully implemented. These facilities could efficiently process hundreds of tons of organic waste per day, reducing the need for expensive and environmentally harmful waste export, reducing distances traveled by compost collection trucks, and creating good local jobs in our communities. Composting facilities are far preferable to anaerobic co-digestion facilities where food waste is added to sewage sludge to produce biogas.
- The City should commit to downsizing and ultimately ending contracts with "waste to energy" facilities outside of the City such as in Essex County which further imposes environmental harm on other overburdened environmental justice communities.

Key equity goals of the 2006 Solid Waste Management Plan (SWMP) remain unaddressed in the more than two decades since it was drafted. While the Draft 2026 SWMP articulates broad goals and principles that have the potential to address major areas of concern across the five boroughs, it does not provide the level of actionable detail necessary for transparency, accountability, or effective implementation over the next ten years. Major operational and policy elements are described in general terms without measurable milestones and inclusion of the community-led solutions provided in previous testimonies.

- **We urge the City Council, DSNY, and the NYS Department of Environmental Conservation to consider adopting the 30 recommendations of TDT's A People's SWMP in the forthcoming 2026 Solid Waste Management Plan**, which inform public education, infrastructure investments, and enforcement programs needed to divert significantly more waste and to deliver good jobs, safer streets, and less pollution across our City.

Reducing emissions and pollutants from waste management operations is necessary for the climate and health of all New Yorkers. NYC-EJA and TDT will continue to push the City to not only handle its trash and siting of waste transfer stations more equitably, but also reduce its GHG and co-pollutant emissions by transitioning to greener, alternative modes of solid waste management. We look forward to continued engagement with the Committee on Sanitation and the Council to ensure that we continue to make rapid progress toward a more sustainable and just future.