



sanitation

Kathryn Garcia Commissioner

Bureau of Legal Affairs
125 Worth Street
New York, NY 10013

TECHNICAL MEMORANDUM NYC COMMERCIAL WASTE ZONE PROGRAM

CEQR No. 19DOS003Y

Intro. 1574 and 1082-A

October 25, 2019

A. DESCRIPTION OF PROPOSED PROJECT

This Environmental Review Technical Memorandum has been prepared to address certain modifications to the proposed New York City Commercial Waste Zone (CWZ) Program that was analyzed in a Final Generic Environmental Impact Statement (FGEIS) (CEQR No. 19DOS003Y) issued by the Department of Sanitation (DSNY) as lead agency on September 17, 2019 pursuant to the State Environmental Quality Review Act and the City Environmental Quality Review Procedure (SEQRA/CEQR).

PROJECT BACKGROUND

As described in the FGEIS, the City of New York is proposing the CWZ Program to advance the City's efforts to increase commercial recycling; reduce commercial waste carter truck traffic and associated air, noise, and greenhouse gas (GHG) emissions; and improve carting industry operational standards. The CWZ Program would involve local legislation (Intro. 1574 and Intro. 1082-A), DSNY rulemaking to implement the local law, and a contract-award process to establish a zoned commercial waste system throughout the City's five boroughs. The CWZ Program would regulate the collection of commercial waste, including refuse, designated recyclables such as paper, cardboard, metals, glass, and plastics, and source-separated organic waste. It would exclude specialized or intermittent waste streams, such as construction and demolition (C&D) debris, hazardous waste, and textiles¹ which would continue to be collected in the current manner under existing City and State regulatory requirements.

As studied in the FGEIS, the CWZ Program would be a non-exclusive system whereby private carters would competitively bid for the right to service businesses within 20 geographic collection zones with three to five carters operating in each zone. Carters that win zone contracts would be obligated to meet certain contractual requirements aligned with the City's program goals and objectives, as further discussed below.

¹ The excluded waste streams include hazardous waste, C&D debris, fill material, medical waste, electronic waste, textiles, yard waste collected by landscapers, waste collected by a one-time, on-call bulk waste removal service, grease, paper collected for the purposes of shredding or destruction, waste that is collected by a micro-hauler, sewage, industrial wastewater discharges, irrigation return flows, radioactive materials that are source-, special nuclear- or by-product material, and materials subject to in-situ mining techniques that are not removed from the ground as part of the extraction process.

The CWZ Program would standardize the carting contract process by requiring written service agreements between carters and customers and by making the pricing structure more transparent.

The legislative drafting process for the CWZ Program that resulted in the final version of Intro. 1574² modified the CWZ Program in several respects. In accordance with SEQRA/CEQR, the post-FGEIS modifications to the CWZ Program are reviewed below to determine whether they would result in a significant adverse environmental impact that was not adequately considered in the FGEIS.

B. POST-FGEIS CWZ PROGRAM MODIFICATIONS

Certain of these post-FGEIS modifications do not warrant detailed analysis in this Technical Memorandum as the modifications would not affect the analyses and conclusions in the FGEIS and, thus, would not have the potential to result in a significant adverse environmental impact.

These include:

1. Limit of Two Subcontractors per Zone

The FGEIS indicated that carters would be allowed to form consortiums or subcontract with other carters to provide recycling and organics collection in addition to refuse collection. The potential to submit proposals as a consortium with other carters, as well as certain subcontracting allowances, would provide opportunities for an array of different carters. The post-FGEIS modifications limit a selected vendor to two subcontractors per zone. However, a carter that collects waste using exclusively bicycles would not count toward this limit. In addition, as indicated below, since micro-haulers are exempt from the CWZ Program, they would not be affected by this modification. Therefore, this modification would not change the conclusions of the FGEIS.

2. Modification to the Exemption for Commercial Waste Collected by Micro-Haulers

As originally proposed, the CWZ Program exempted waste collected by micro-haulers from the definition of commercial waste and, consequently, the requirements of the CWZ Program. It specifically excluded small tonnages of organics collected by micro-haulers by means of a bicycle or zero-emission vehicle if it was brought to a facility other than a transfer station. The post-FGEIS modifications propose to increase the level of organics that a micro-hauler could collect annually while remaining exempt. Under the modifications, a micro-hauler would remain exempt if it collected less than 2,600 tons per year (TPY) of organics using a bicycle and less than 500 TPY in a zero-emission vehicle. The modifications will also enable DSNY to permit additional modes of transportation to be included through future rulemaking. By expanding the tonnages that could be collected by micro-haulers by means of transportation that have zero emissions, this modification does not change the conclusions in the FGEIS.

3. Consideration of Price in the Request for Proposals (RFP)

As noted in the FGEIS, in order to receive a zone to collect waste, commercial carters would respond to DSNY's RFP with proposals for DSNY's review. Proposals would be evaluated on criteria outlined in the RFP that would determine which carters provide the best overall value consistent with program goals and service requirements. Each proposal would be evaluated based on designated criteria to determine an overall weighted score of each proposal. The FGEIS indicated that the proposed carting fee and pricing would constitute at least 40 percent of the overall weighted score. The post-FGEIS modifications do not specify

² Intro 1082-A, part of the two proposed bills introduced to implement the CWZ Program, requires GPS units within carting trucks that are operating within a CWZ zone. This requirement was part of the FGEIS analysis.

the degree to which the various elements of the carter's proposal would be weighed and factored into the evaluation of proposals. It is expected that price will remain the factor weighed most heavily in evaluating a carter's proposal. Since this 40 percent number was not used in any of the analyses included in the FGEIS, this modification would not change the conclusions of the FGEIS. As indicated in the FGEIS, in addition to price, the RFP is anticipated to include a number of requirements that carters would implement in order to demonstrate compliance with applicable policies.

4. Residential and Institutional Supplemental Service

As indicated above, the CWZ Program excludes certain waste streams. In addition, waste from institutional uses, such as museums, and schools, as well as households and public facilities, is collected by DSNY and would not be affected by the Proposed Action. However, a small number of large residential and institutional users utilize supplemental services provided by commercial carters and are identified in the Business Integrity Commission (BIC) Customer Register.³

The post-FGEIS modifications would specify that only carters selected for the zone or selected for citywide containerized collection, explained in more detail below, are authorized to collect from large residential and institutional users that require supplemental service from a commercial carter. These users were already accounted for in the September 2019 FGEIS analyses; therefore, this modification would not affect the conclusions of the FGEIS.

5. Employee Retention List

The post-FGEIS modifications include an employee retention requirement that would only apply if a CWZ contract is assigned from one entity to another during the service period.⁴ The provision would limit the successive owner's ability to discharge the original carter's employees (except for cause) for a 90-day period from the date of assignment. If the successive owner determines during the 90-day transitional period that it needs fewer employees than the original carter employed, the employees retained from the original carter's staff must be chosen based on seniority. Employees from the original carter who are discharged without cause by the successive owner in the 90-day period must be placed on a preferential hiring list and provided a right of first refusal by seniority within their job category if positions become available in that 90-day retention period. This modification is not anticipated to change the conclusions of the FGEIS. The CWZ Program does not require carters to sell their companies and this provision is intended to provide some additional support to employees. The provision does not warrant that a new socioeconomic analysis be completed. The retention requirement is a temporary cost that will likely be evaluated as part of the value and purchase of the original carter and would not impact the operating costs to the carting industry overall or the price of carting services to NYC commercial businesses.

³ BIC 2017 Q2–Q4 Customer Register. This dataset includes customer information reported by individual carters on a regular basis to BIC.

⁴ This provision would not apply to any carter that, on or before the effective date of the assignment of the agreement, enters into a collective bargaining agreement covering the eligible employees or agrees to assume, or to be bound by, the collective bargaining agreement of the original owner covering the eligible employees, provided that such collective bargaining agreement provides terms and conditions regarding the discharge or laying off of employees.

Certain other post-FGEIS modifications to the CWZ Program as outlined in Intro. 1574 warrant additional discussion. These modifications are summarized below and addressed as appropriate in the respective technical sections of this Technical Memorandum:

1. Number of Carters per Zone

The FGEIS analyzed the CWZ Program as a non-exclusive system of 20 geographic zones permitting at least three but no more than five carters operating within each zone. Specifically, 14 zones would allow three carters, four zones (all in Manhattan) would allow four carters, and two zones (in midtown Manhattan) would allow five carters.

The post-FGEIS modifications would limit the number of carters per zone to three citywide (see **Figure 1**). As in the FGEIS, each carter would be able to compete for one or more zones throughout the City based on its preferences and no carter would be able to win contracts for more than 15 zones. In total, 60 commercial waste zone carting contracts would be available to win, a reduction of eight contracts from the 68 possible waste zone contracts available in the CWZ Program reviewed in the FGEIS (not including dedicated containerized contracts discussed below). Additionally, the potential to submit proposals as a consortium with other carters, as well as certain subcontracting allowances, would still provide opportunities for an array of different carters.

2. Containerized Contracts

The CWZ Program analyzed in the FGEIS required carters servicing zones to be adequately prepared to handle all waste produced within a zone. The FGEIS assumed carters selected to operate in areas with large commercial properties would be prepared to service the waste collection needs of large commercial properties. This would include services already received by commercial properties in the existing condition, such as containerized pickup, compactor rental, unlocking and entering loading docks, and flexible collection. Under Intro. 1574, containerized commercial waste includes commercial waste that is stored on the premises of a commercial establishment in a container that has a capacity of 10 cubic yards or more, which may or may not be equipped with compaction ability, and is transported in the container to a transfer, processing, or disposal location. Containerized commercial waste generally includes waste collected in compactors and open top containers (roll-on/roll-offs). These types of waste pick-ups typically have only one or two customer stops per route. The route starts at the garage, picks up the containerized waste from one customer, drops off the waste at the transfer station, and brings the empty container back. Alternatively, the route starts at the garage, picks up the containerized waste from one customer, and drops off the waste at the transfer station, while another route drops off an empty container at the first customer and picks up a full container from a second customer on the way to the transfer station. The FGEIS included containerized collections within the estimated truck trips and these collections were treated as unchanged in the No Action and the Proposed Action conditions.

The post-FGEIS modifications would supplement the 20 proposed waste zones by establishing one citywide zone in which up to five carters could receive a contract to provide collection service of containerized waste from any commercial establishment within the City. Carters chosen for one of the 60 potential waste zone contracts could also continue to offer containerized service within the zone they are selected to operate within.

With this modification, large commercial property owners with containerized service in one or more zones would be able to contract with one carter for all their properties, in lieu of using a carter specified in their zones. A carter may have up to 15 contracts in 15 zones across the City, and also hold one contract for

containerized services. This would also result in some zones that may have more than three carters operating within a particular zone if that zone has large commercial properties with containerized contracts.

3. Enhanced Health and Safety Training

One of the goals of the CWZ Program is to improve training and safety standards to make the industry safer. The FGEIS analyzed the costs associated with a health and safety program that included safety training for workers in the commercial waste field. Safety training includes the costs associated with paying a vendor to provide training for commercial carting staff and the payroll expense associated with paying staff to participate in the training program.

The post-FGEIS modifications propose additional health and safety training requirements for carters awarded contracts under the CWZ Program. These additional requirements would increase the one-time training for field employees from the 16-hours studied in the FGEIS to 40 hours, add a minimum one-time training of eight hours for all other employees and add an annual refresher training for all employees.

4. Minimum Rate

As discussed in the FGEIS, in order to receive a contract to collect commercial waste within a zone, commercial carters would prepare and submit competitive proposals to DSNY for consideration. Proposals would be evaluated on criteria outlined in the RFP, which would determine the carters that would provide the best service consistent with program goals and service requirements. Each proposal would be evaluated based on designated criteria to determine an overall weighted score of each proposal. The FGEIS assumed that the competitive solicitation process would result in having competitively priced proposals from carters for waste collection services.

In order to ensure that carters do not propose unrealistically low rates, risking their operational viability in order to be competitive, post-FGEIS modifications would allow DSNY, at its discretion, to adopt a rule to set a citywide minimum rate for commercial carting services.

C. ENVIRONMENTAL REVIEW OF THE POST-FGEIS MODIFICATIONS

This Section assesses the potential for the relevant post-FGEIS modifications to the CWZ Program to result in significant adverse impacts to the environment not considered by the FGEIS such that a supplemental generic environmental impact statement would be warranted. As with the FGEIS, the review follows the 2014 *CEQR Technical Manual*. The post-FGEIS modifications are not expected to affect the following technical areas: land use, zoning and public policy; community facilities and services; open space; shadows; historic and cultural resources; urban design and visual resources; natural resources; hazardous materials; water and sewer infrastructure; energy; air quality, greenhouse gas emissions and climate change; noise; public health; neighborhood character; or construction. The CEQR technical areas considered below with the post-FGEIS modifications include socioeconomic conditions, solid waste and sanitation services, and transportation. The post-FGEIS modifications do not alter the conclusions of the September 2019 FGEIS, which found that the CWZ Program would not result in any significant adverse environmental impacts.

SOCIOECONOMIC CONDITIONS

The CWZ Program as analyzed in the FGEIS would impose restrictions on the number of carters operating per zone and impose certain costs on the industry, while making carting routes more efficient and reducing operating costs. While some carters may exit the market, overall the CWZ Program was found to not result in significant adverse effects on the commercial waste carting industry, or on businesses that rely on commercial waste carting services. Therefore, as disclosed in the FGEIS, the CWZ Program would not

result in significant adverse environmental impacts due to changes in socioeconomic conditions. The post-FGEIS modifications in Intro 1574 have been considered and found not to change the conclusion of the FGEIS of no significant socioeconomic impact, as discussed below.

NUMBER OF CARTERS PER ZONE

The post-FGEIS modifications to the CWZ Program would reduce the total number of commercial carting zone contracts from 68 to 60, resulting from the reduction of available contracts for six zones in Manhattan from either four or five carters to three carters in each zone. With the additional five citywide containerized contracts discussed below, there would be a total of 65 zone contracts available. The modifications would still allow all carters to bid on all zones and would limit the total number of zones a single carter could service to 15 plus the potential to hold one of the containerized contracts.

As discussed in Chapter 3, “Socioeconomics,” of the FGEIS, the reduction of overlapping routes and the time necessary to complete a route in a specific area or zone within the city under the CWZ Program would result in increased zone routing efficiencies (ZRE) as compared to the current and No Action system. As the modifications would reduce the total number of commercial waste carting contracts, and the number of carting businesses collecting waste from the most commercially dense portions of Manhattan, the modifications are likely to result in increased ZRE as compared to the CWZ Program as studied in the FGEIS. As discussed in Chapter 3 of the FGEIS, while the total waste collected would remain unchanged under the CWZ Program, increased ZRE would have the potential to reduce the total number of trucks and vehicle miles traveled (VMT) necessary to collect commercial waste in a zone. The post-FGEIS modifications would result in a further reduction in the number of trucks and VMT necessary to collect commercial waste in a zone, affecting six of the 20 zones, all of which are located in dense, compact areas of Manhattan. As a result of the anticipated increase in ZRE, the operational costs of carters would likely be slightly reduced, compared to the cost of carter operations analyzed in the FGEIS.

Commercial businesses in the impacted zone that rely on services provided by the commercial waste industry would have access to three competitively priced waste collection service providers under the post-FGEIS modifications. Additionally, larger commercial customers, many of which are located in Manhattan, would also have the opportunity to contract with one of the five carters selected to provide citywide containerized service. With the increased ZRE and slight reduction in operating costs resulting from the modifications, it is not anticipated that the total price that commercial businesses will pay for commercial carting services will increase due to the modifications as compared to the minimum viable price (MVP) analyzed in the FGEIS. As in the FGEIS, the proposed post-FGEIS modifications are not anticipated to change the ability of commercial waste carting customers to select their own carter from those awarded contracts in their zone. All carters selected to operate within the six Manhattan zones affected by the post-FGEIS modifications would have adequate capacity to service customers and be held to the same contractual requirements as in the CWZ Program studied in the FGEIS.

CONTAINERIZED CONTRACTS

The post-FGEIS modifications would establish a mechanism for the provision of an additional five citywide collection contracts solely for the collection of containerized waste. These containerized waste contracts would be in addition to the 60 CWZ contracts, and would modify the CWZ Program by introducing flexibility such that not all carters would need to invest in containerized waste collection infrastructure, including specialized trucks and compactors.

As the total volume of containerized waste collected and the total number of containerized waste routes are not anticipated to significantly change under the post-FGEIS modifications, the operational costs associated with servicing these containerized routes are anticipated to remain the same as the operational costs estimates in the FGEIS. In the FGEIS, containerized routes were treated as unchanged in the No Action and the Proposed Action conditions since these types of waste pick-ups have only one or two customers per route with a carter arriving at a large business via a direct route, loading the containerized waste onto its truck, and traveling directly to the waste transfer station. As the post-FGEIS modifications would not change the method by which containerized waste is collected, the cost of commercial carting operations, or commercial carting services as compared to the FGEIS, it is unlikely that the modifications would result in an increase in the MVP that disrupts the business dynamics of the commercial carting industry or of businesses that rely on the carting industry.

ENHANCED HEALTH AND SAFETY TRAINING

The post-FGEIS modifications to the CWZ Program include certain increased health and safety training for commercial carting employees. As a result, commercial carters would have increased expenses associated with health and safety training as compared to the costs evaluated in the FGEIS; however, these additional costs were reviewed and are not anticipated to increase the cost of commercial waste collection so as to result in significant adverse socioeconomic effects.

As analyzed in the FGEIS, health and safety training requirements of the CWZ Program were anticipated to cost the commercial carting industry in the aggregate approximately \$1.3 million in the 2024 analysis year. This cost includes approximately \$525,000 for third party vendors to provide 16 hours of safety training for all field employees (estimated at 1,751 workers); and approximately \$816,000 in payroll expenses to compensate workers for their time participating in training programs, for a total cost of approximately \$1.3 million for training. As indicated in the FGEIS, the \$1.3 million costs associated with a one-time, 16 hour health and safety training combined with the other costs assumed with the implementation CWZ Program's implementation—such as required GPS units, a City administrative fee, and free waste assessments for customers—would be offset by the reduction in carter operating costs resulting from ZRE. As such, the FGEIS determined the CWZ Program would result in an estimated \$14.1 million reduction in operating costs from the No Action condition.

The post-FGEIS modifications include additional enhanced health and safety requirements, including a one-time 40-hour, on-the-job training for field employees, 24 hours more training than the 16 hours already accounted for in the FGEIS. Specifically, the modifications would require vehicle operators, laborers and helpers (estimated at 1,751 workers), who are directly assigned to the collection, removal, transport or disposal of trade waste on or about the public right-of-way, to attend one-time, documented training consisting of at least 40 hours of which no fewer than 16 hours would be dedicated to classroom instruction. For all other non-field workers (estimated at 880 workers), such training would consist of no less than eight hours. These enhanced health and safety training requirements would cost approximately \$3.6 million. Using the analysis of the FGEIS for the other costs assumed with the CWZ Program's implementation, health and safety training accounts for approximately 0.65 percent of the carters' operating costs under the CWZ Program for the first-year only. The post-FGEIS modifications would also include an annual refresher training class to all workers; however, the annual impact of the safety training requirements in future years would be lower as compared to the 2024 Analysis Year. While the enhanced health and safety requirements would increase the health and safety costs to carters by approximately \$2.3 million from the cost studied in the FGEIS, the overall reduction in carter operating costs would be approximately \$11.8 million compared to the No Action condition. As health and safety costs make up a small component of the total operational

expense, increasing health and safety costs are unlikely to result in an increase in the MVP that disrupts the business dynamics of the commercial carting industry, or of businesses that rely on the carting industry.

MINIMUM RATE

Intro 1574, as revised, would allow DSNY at its discretion to adopt a rule to establish a minimum carting rate. If such a rule were implemented by DSNY, this would not alter the findings of the socioeconomic assessment presented in the FGEIS. The detailed analysis in the FGEIS, which did not consider a minimum rate, found that the CWZ Program would not jeopardize the viability of the commercial carting industry or businesses that rely on the commercial carting industry. The proposed minimum rate if adopted by DSNY rule could ensure that carters do not charge unrealistically low rates, risking their operational viability in a “race to the bottom” in order to be competitive. Further, as the minimum rate would not affect operational costs of the CWZ Program, the cost of commercial carting services to business customers is not anticipated to change if DSNY chooses to implement this modification by rule. The FGEIS analysis found that on the aggregate, current rates are greater than the estimated MVP; therefore, the proposed minimum rate would also be expected to fall below current rates.

Conclusion

The cumulative effects of the post-FGEIS modifications would not alter the FGEIS finding that the CWZ Program would not result in significant adverse environmental impacts due to changes in socioeconomic conditions. The post-FGEIS modifications to the MVP for commercial carting services is anticipated to remain below the median cost of carting services in the existing condition, or the cap rate set in the No Action condition. While the post-FGEIS modifications to health and safety standards could increase the cost of commercial waste carting operations as compared to the FGEIS, these cost components comprise a small portion of total operating expenses and, overall, the CWZ Program would reduce carters’ operating expenses. The enhanced health and safety requirements are unlikely to require the MVP for carting services to increase in a manner that disrupts the business dynamics of the commercial carting industry, or the viability of businesses that rely on the carting industry. Moreover, costs associated with the modifications would likely be lessened as the proposed reduction in total CWZ contracts awarded is anticipated to increase ZRE, reducing the overall operational expense for carting services in the affected six Manhattan zones. Any potential increase in operating costs as a result of the modifications is not anticipated to increase the MVP for commercial carting services in a way that disrupts the business dynamics of the commercial carting industry, or of businesses that rely on the carting industry.

SOLID WASTE AND SANITATION SERVICES

NUMBER OF CARTERS PER ZONE

The post-FGEIS modifications to the CWZ Program would not alter the findings of the solid waste and sanitation services assessment presented in the FGEIS.

As discussed in the FGEIS, as both carters and customers would be required to comply with any existing laws regarding recycling and organics as well as comply with any new or revised laws or regulations, there would be an expected increase in recycling and organics diversion, but this would not decrease the overall volume of total collections of all three commercial waste types (refuse, designated recyclables, and organics). Therefore, the CWZ Program would not increase the total volume of waste being produced or collected but would result in a redistribution of what waste would be collected and by which carter it would be collected. Further, the FGEIS estimated that, as a result of more efficient routing and more efficient truck loading (e.g., filling to capacity), the commercial carting industry would require fewer trucks under the

Proposed Action as compared to the No Action and existing conditions. The FGEIS found that under the CWZ Program, the commercial carting industry would require an estimated fleet of 739 trucks, which would provide sufficient capacity in order to collect the commercial waste generated within New York City.

The post-FGEIS modifications to the CWZ Program would reduce the total number of commercial carting zone contracts from 68 to 60, resulting from the reduction of available contracts for six zones in Manhattan from either four or five carters to three carters in each zone. Additionally, the modifications would also add five citywide containerized contracts as discussed in detail above. The total volume of waste collected within these zones would not change as a result of the modifications despite the number of carters operating within these zones being reduced in the six affected Manhattan Zones. Containerized routes would most likely serve densely developed central business district areas. As a result, the operating carters within these zones would provide sufficient capacity to continue collecting commercial waste generated within the zones without missed pick-ups or disruption to service. The FGEIS Alternatives analysis found that having just one exclusive carter per zone (including in Manhattan) would be sufficient to maintain adequate service; therefore allowing three (plus containerized routes) would also be adequate to maintain service levels.

Therefore, the post-FGEIS modifications are not anticipated to result in any significant adverse impacts to solid waste and sanitation services.

TRANSPORTATION

NUMBER OF CARTERS PER ZONE

The post-FGEIS modifications to the CWZ Program would not alter the findings of the transportation assessment presented in the FGEIS but would change certain aspects of the analysis.

As analyzed in the FGEIS, the CWZ Program would result in an overall decrease of overlapping carting truck routes along road segments, resulting in a decrease in VMT within New York City.

As a result of the proposed limit of three carters within six zones in Manhattan, further increases in the efficiency in waste collection routes are anticipated, such that associated VMT and overall truck traffic would further decrease from the CWZ Program analyzed in the FGEIS.

CONTAINERIZED CONTRACTS

The post-FGEIS modifications with respect to containerized contracts would not alter the findings of the transportation assessment presented in the FGEIS. The FGEIS used 2018 routing data⁵ that included data for the collection of containerized waste from 22 carters. This data was used in the baseline VMT calculations. Since these types of waste pick-ups have only one or two customers per route where a carter arrives at a large business via a direct route, loads the containerized waste onto its truck, and goes directly to the waste transfer station, such, containerized routes were treated as unchanged in the No Action and the Proposed Action conditions in the FGEIS. In addition, the direct transportation of the container to the transfer station means that these routes are already optimized and VMTs are minimal.

With the post-FGEIS modifications, carters could still provide for the collection of containerized waste within their designated zone; however, the CWZ Program would also allow five citywide contracts for carters to collect containerized waste citywide. As the FGEIS included containerized waste pickups in zones

⁵ BIC, 2018, Private Carter Routing Data collected for one week between March 4 to March 10, 2018 and supplemental days between March 11 to March 17, 2018 to replace the data collection on days impacted by snow. This 2018 route data collection was done to provide carters the opportunity to provide more up-to-date routing data than the 2014–2015 data.

across the city in the No Action and Proposed Action conditions, the analysis already accounted for the modification and it is not anticipated to result in any significant adverse impacts to transportation.

Conclusion

The cumulative effects of the post-FGEIS modifications to the CWZ Program as outlined in Intro. 1574 would not alter the FGEIS finding that the CWZ Program would not result in significant adverse environmental impacts to transportation. The post-FGEIS modification to the number of carters within six zones in Manhattan increases the efficiency in waste collection routes, such that associated VMT and overall truck traffic would further decrease from the CWZ Program analyzed in the FGEIS. In addition, since containerized waste was included in the FGEIS analysis, adding five containerized waste citywide contracts would not change the results of the FGEIS. Therefore, the CWZ Program with the post-FGEIS modifications is still anticipated to result in reduced VMT and overall truck traffic associated with commercial carting industry and is not anticipated to result in any significant adverse impacts to transportation.

CONCLUSION

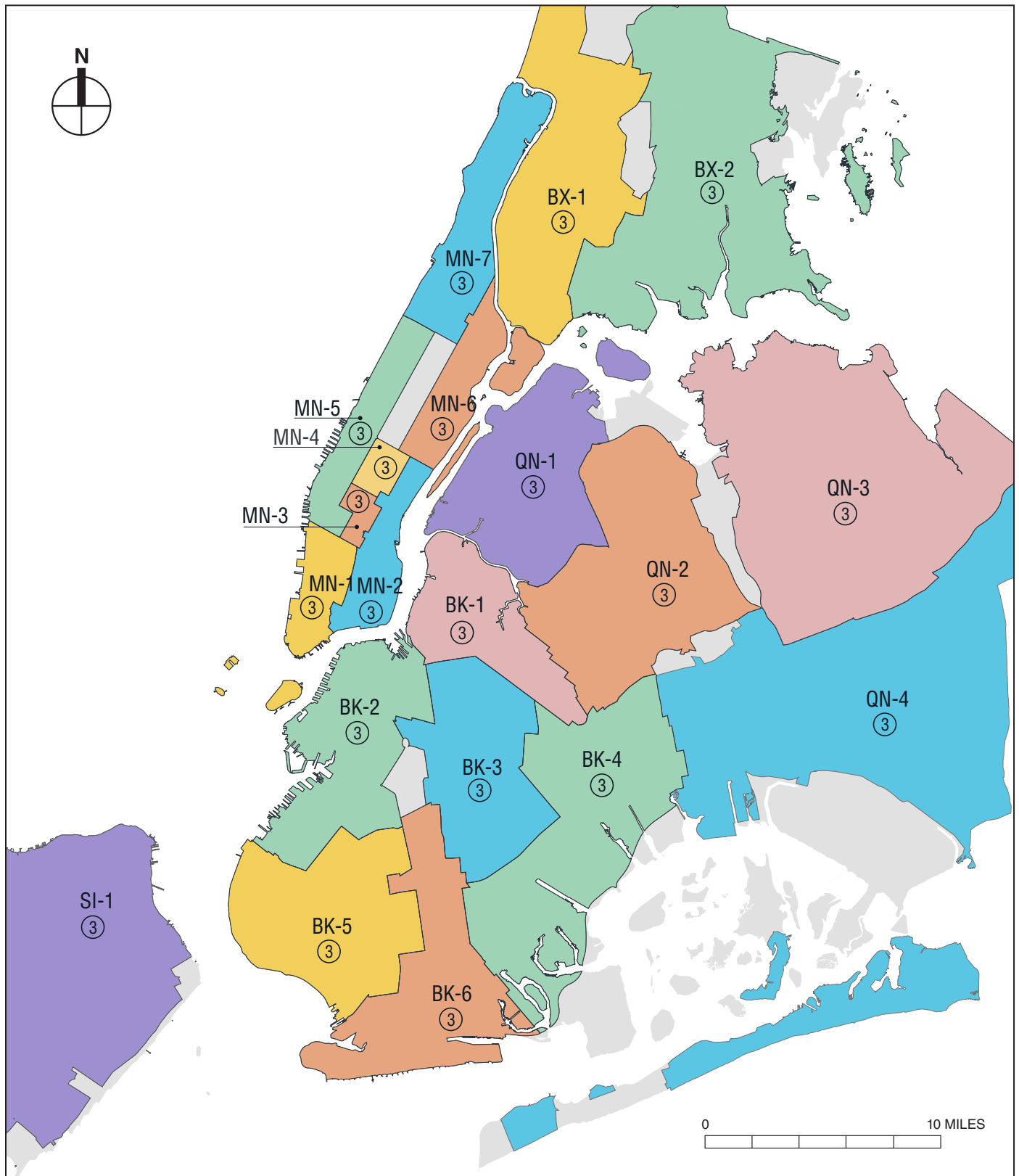
Based on the above assessment, no new or additional significant environmental impacts are expected to result from these post-FGEIS modifications to the CWZ Program. Therefore, consistent with the September 2019 FGEIS, the CWZ Program as modified would not result in any significant effects on the environment, and a supplemental GEIS is not warranted.


Steven N. Brautigam, Assistant Commissioner, Legal Affairs
NYC Department of Sanitation

October 25, 2019

Attachment

Figure 1. Map of Proposed Commercial Waste Zones



Ⓝ Number of Carts To Operate In Each Zone