**To: NYC Department of Sanitation**  
**From: Kim Moscaritolo, Democratic District Leader, 76th AD Part B**

**December 26, 2018**

I applaud the City’s effort to transform the private carting industry. Such action is long overdue. However, I would like to see the City go further by studying an exclusive zone system.   
  
While the city’s plan is a step in the right direction, more can be done to improve the lives of workers and the communities impacted directly by the private waste industry. I strongly urge the Department of Sanitation to include an exclusive zone model - in which a single, high-quality waste service provider is contracted to collect and process waste in each commercial zone - as one of the alternatives in the Environmental Impact Statement. Only an exclusive system will give the city the necessary leverage to enforce higher standards for workers and communities while drastically reducing miles driven from private waste trucks.

Because of the disproportionate siting of waste facilities in low-income, communities of color, I also urge you to take a closer look at the standards at these facilities. The new zoned system should ensure that poorly sited facilities with a history of violations not be permitted to handle our city’s waste. The city should also ensure that transfer, recycling, and compost facilities are required to meet the same basic labor standards as the carters.

The study should also consider how wage standards can help raise the incomes of low-paid private sanitation workers.   
  
An exclusive zone system is the best option to ensure that workers, small businesses and our communities are protected under the highest labor, safety and environmental standards. Thank you.