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The City of New York
Community Board 8 Manhattan

August 7, 2026

Via Electronic Mail

Abas O. Braimah
Administrative City Planner
DSNY Bureau of Legal Affairs
125 Worth Street, Room 710
New York, NY 10013
containerEIS@dsny.nyc.gov

RE: Community Board 8 Manhattan's comments on the Draft Environmental Impact Statement for the Citywide Containerization Program CEQR No. 25DOS003Y

Dear Mr. Braimah,

Community Board 8 Manhattan is offering the following comments on the Draft Environmental Impact Statement re Citywide Containerization Program CEQR No. 25DOS003Y, dated July 1, 2026 (the "DEIS") for your consideration.

Our comments are based on a review of the DEIS, our Chair's attendance at the public hearing in respect of the DEIS, and a public hearing that was held at a joint meeting of the Environment and Sanitation Committee and Transportation Committees of Manhattan Community Board 8 on August 3, 2026. Our public hearing was attended by a representative of the New York City Department of Sanitation (DSNY), Director of Outreach Andrew Hoyles and more than 50 members of the public.

Our comments are as follows:

As a procedural matter, the issuance of the DEIS on July 1, 2026, with a public hearing held less than 4 weeks thereafter and the closure of the public comment period on August 7th is inappropriate given that Community Boards typically do not meet in July or August (we meet in July but being unaware that the DEIS was to be issued, did not have a meeting of our Sanitation Committee scheduled and there was not enough time, to put it on our Transportation agenda; in fact, we called a special meeting in August to discuss the issue) and many members of the public are on vacation during this time. None of us were aware that the Community District 8 would be the prototypical neighborhood reviewed in the DEIS. We question the selection of East 76th Street between Second and Third Avenues as the observation point since that is a block taken up primarily by a public school and is not representative of most streets in our district.

Our substantive comments deal with two areas of the DEIS:

The first centers on the loss of on-street parking, which falls under the Transportation section (Section 8) of the DEIS. The CEQR Technical Manual states that the availability of on and off-street parking as well as the availability of alternative modes of transportation will be considered in making a determination of "significance". The projected availability of parking in Community District 8 after giving effect to the project, is clearly, over the threshold, so as to qualify as a "significant impact". The DEIS states that significant impacts occur when there is a shortage of parking that exceeds 6.42 percent. In Community District 8, the shortage of available parking is projected to be approximately 9.99 percent. Despite this percentage, the DEIS concludes there is not a significant impact because "alternate modes of transportation" are available and its inclusion of parking availability beyond the usual 0.25-mile radius area, i.e., up to 0.50-mile radius. The DEIS does not review in any detail how the alternate modes of transportation in Community District 8 will make up for the loss of parking in a district with a high percentage of car ownership and the DEIS does not consider at all that Community District 8 has the largest percentage of older residents in New York City and the impact that has on the whether there are real "alternate modes of transportation" available to that population. In addition, there does not appear that any consideration was given to the fact that our District is the home to more than 9 hospitals, and several colleges and universities. Many employees of those institutions, as well as employees of many residential buildings, must travel into our District by car. They rely on the availability and affordability of on-street parking because of their shift hours, and the lack of fast reliable public transportation from their homes to their place of employment. The DEIS also fails to account for those New Yorkers, and others who must travel to our District by car from all over New York City and beyond for medical care at these hospitals, and their related private medical offices. Many people who use on-street parking cannot afford the cost of off-street parking in our District (which can run upwards of $800-900 a month (we question the approximate $290 figure mentioned in the DEIS for off-street parking)). The DEIS tacitly recognizes the severity of the parking availability issue in our District but suggests, in order to avoid the conclusion of a "significant impact", that you can look at availability of parking up to a 0.50-mile radius when in fact the CEQR Manual makes clear that you cannot go out that far in Manhattan. We therefore conclude that further review is required to assess the true impacts of this project on availability of parking in our District.

Our second substantive concern relates to the DEIS conclusions with respect to the Design and Visual Resources set forth at section 6.1 of the DEIS. That section makes a number of generalizations about how the placement of the Empire Bins in the street full time will be much better visually than having garbage bags or cans on the sidewalk for limited periods of time only several days a week. There are photos in the DEIS which show the placement of small containers and larger ones (Photos 10 through 12). However, the photos are very selective and do not depict what a number of very large containers (the DEIS indicates the containers will be 6.16 feet long by 5 feet wide by 5.25 feet tall) all placed in a row would look like. Given the number of buildings with 30 plus apartments in a row on many of the streets in our District, we are concerned that for all practical purposes, a permanent wall of huge dumpsters will exist in front of buildings. We are concerned about the resulting 24/7 visual blight, and perhaps even

more significant than the effect on our quality of life, we are concerned about public safety, especially at night, as ambient light from street traffic which helps illuminate the sidewalks may be blocked by these tall and wide non-transparent containers. We believe this needs more study since New York City and in particular Manhattan has streets, with many almost attached, large apartment buildings side by side that would require a significant number of these Empire Bins. Many members of the public raised this issue at the August 3rd joint meeting; they do not want to be living in "Upper East Dumpsterville".

Finally, the DSNY representative who attended our August 3rd meeting indicated that the DSNY would consult with buildings that have particular circumstances and want to place their containers in different areas in an effort to make accommodations to those special situations. We hope that this is something that will happen if this program is implemented.

We are happy to meet with the appropriate persons to provide more information about the concerns of our District at your convenience.

Respectfully submitted,

Valerie S. Mason

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Chair

Sahar Husain and Addeson Leho

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Co-Chairs, Sanitation and
Environment Committee

Craig Lader and Charles Warren

Craig Lader and Charles Warren
Co-Chairs, Transportation Committee

cc: Honorable Kathy Hochul, Governor of New York
Honorable Zohran Mamdani, Mayor of the City of New York
Honorable Brad Hoylman-Sigal, Manhattan Borough President
Honorable Jerrold Nadler, 12th Congressional District Representative
Honorable Liz Krueger, NYS Senator, 28th Senatorial District
Honorable José M. Serrano, NYS Senator, 29th Senatorial District
Honorable Edward Gibbs, NYS Assembly Member, 68th Assembly District
Honorable Alex Bores, NYS Assembly Member, 73rd Assembly District
Honorable Rebecca Seawright, NYS Assembly Member, 76th Assembly District
Honorable Julie Menin, Speaker, NYC Council, 5th Council District
Honorable Virginia Maloney, NYC Council Member, 4th Council District
Honorable Elsie Encarnacion, NYC Council Member, 8th Council District
Honorable Gale A. Brewer, NYC Council Member, 6th Council District
Ovie Lattimore, Manhattan Borough Manager, Mayor's Office of Mass Engagement
Gregory Anderson, Commissioner, New York City Department of Sanitation
Andrew Hoyles, Director of Outreach, New York City Department of Sanitation
Marissa Yanni, Community Affairs Liaison, New York City Department of Sanitation