



Public Comment Analysis

Date: January 18, 2011

Topic: The Proposed Re-siting of Richard R. Green High School of Teaching (02M580) to the Broadway Educational Campus (M282) and Co-location with the Lower Manhattan Community Middle School (02M896) and the Urban Assembly School of Business for Young Women (02M316)

Date of Panel Vote: January 19, 2011

Summary of Proposal

Richard R. Green High School of Teaching (02M580, or “Richard R. Green”) is an existing school located in building M066 (“M066”) at 421 East 88th Street, New York, NY 10128. It currently serves 600 high school students in grades 9-12.

On December 3, 2010, the Department of Education (“DOE”) published a proposal to implement a “Re-Siting,” which means that Richard R. Green would move to the Broadway Educational Campus, school building M282 (“M282”), located at 26 Broadway, New York, NY 10004, within the geographic confines of Community School District 2 (“District 2”). If the proposal is approved, Richard R. Green would be co-located with the Lower Manhattan Community Middle School (02M896, or “LMCMS”), an existing school serving grades 6-8, and the Urban Assembly School of Business for Young Women (02M316, or “UA School of Business”), an existing single-sex school serving girls in grades 9-12, beginning in the 2011-2012 school year. A “co-location” means that two or more school organizations are located in the same building and may share common spaces like auditoriums, gymnasiums, and cafeterias.

Richard R. Green is currently located in M066, which was originally built to serve elementary grades. All the elementary school buildings in the Upper East Side neighborhood in District 2 are over capacity, ranging from 112 to 149% of target utilization. The move of Richard R. Green to M282 would provide additional space for elementary students zoned to attend elementary school in the area surrounding M066. In a separate Educational Impact Statement (“EIS”), also released on December 3, the DOE proposed to move P.S. 151 into the space vacated by Richard R. Green in M066 for the 2011-2012 school year. That proposal is contingent upon approval of this proposal.

The M282 building has adequate capacity to accommodate Richard R. Green at full organizational capacity as well as the existing schools in the building. The DOE's space in the building can serve 1,588 students. In 2011-2012, there would be approximately 1,265-1,350 students served in the building. When all schools are at scale in 2012-2013, there would be approximately 1,300-1,425 students served in the building.

The DOE recognizes that moving a school might not be easy for students, teachers and parents. However, this proposal provides new opportunities for the students at Richard R. Green by allowing them to attend school in a space designed to serve high school students and also grants the community some benefits that do not exist in the current location.

Furthermore, this proposal addresses some concerns from the Richard R. Green community. Two years ago, the DOE approached Richard R. Green with a proposal to move the school to the M045 building in East Harlem. The school community expressed some concerns about that proposal which the DOE believes are not applicable to the current proposal. The new location at 26 Broadway is convenient to public transportation, is a brand new high school building with excellent facilities designed for high school students including a gymnasium, library, and new science labs, and is close to cultural opportunities for students.

Summary of Comments Received at the Joint Public Hearings

Two joint public hearings regarding this proposal were held, one at the Broadway Educational Campus on January 5 and one at the Richard R. Green High School of Teaching on January 6. At the hearings, interested parties had an opportunity to provide input on the proposal. On January 5, approximately 60 members of the public attended the hearing, and 21 people spoke. Present at the meeting were District 2 Superintendent Daria Rigney; Community Education Council member Eric Greenleaf; Richard R. Green Principal David Raubvogel and School Leadership Team representatives Jeffrey Vogel, Kim Vogel, Gwen Ati, and Job Nogs; Lower Manhattan Community Middle School (LMCMS) Principal Kelly McGuire and School Leadership Team representatives LouAnna Smith, Crystal Clarson and Jane Eisen; Urban Assembly School of Business for Young Women Principal Patricia Minaya and School Leadership Team representative Sheniqua Simon.

On January 6, approximately 125 members of the public attended the hearing, and 34 people spoke. Present at the meeting were High School Superintendent Elaine Gorman; District 2 Community Education Council member Shino Tanikawa; Richard R. Green Principal David Raubvogel; SLT members Robin Taylor, Erica Pardot, Ritu Singh and Jeffrey Vogel.

The following comments and remarks were made at the joint public hearings:

1. Principal Raubvogel stated that Richard R. Green has struggled with a lack of facilities for many years. The proposal to site the school at 26 Broadway is a once-in-a-lifetime opportunity that the hard-working students and teachers deserve. They need appropriate science labs, and their basketball team, which made the City finals, deserves a gym to

practice in. The proposal also addresses the dire need for elementary school space on the Upper East Side.

2. Shino Tanikawa spoke as an individual member of the CEC, and voiced support for appropriate facilities for all high school students, and a good site for the zoned elementary school. She commented that she is wary of all school co-locations and think there is a lot required to make them work. She stated that the DOE should do a better job of long-term planning to avoid pitting the needs of different students against one another and prevent the necessity of co-locations.
3. Richard R. Green SLT member Robin Taylor stated she was in favor of the proposal as both a representative of the SLT and as a parent, because the current building does not have an appropriate cafeteria or gym, but one combined room for both purposes. Ms. Taylor also noted that the space is made for smaller students; teenagers need to crouch in stairwells.
4. Richard R. Green SLT member Erica Pardot stated that although she was aware that Millennium High School (“Millenium”) wanted to move into the 26 Broadway space, but stated Richard R. Green needs the space because it is too cramped.
5. Richard R. Green SLT member Ritu Singh stated that Richard R. Green needs the space more than Millennium. High school students deserve a high school space, not an elementary school space, and the new space would provide a better experience with better facilities for students.
6. UA School of Business SLT member Sheniqua Simon expressed concerns about safety, asking whether Richard R. Green students would have designated times for entering and leaving the building, whether there would be more safety officers, and how fire drills would be handled. She also commented that one nurse might not be sufficient to serve all students, and that lunch times would have to be coordinated.
7. LMCMS SLT member Jane Eisen raised safety concerns about a middle school being co-located with so many high school students.
8. LMCMS SLT member Crystal Carlson echoed concerns about co-locating the middle school with high schools, and commented that the school has a good relationship with Millennium and would like to be able to continue and develop that relationship.
9. Paul Goldstein spoke on behalf of Speaker Sheldon Silver, commenting that there are other locations to site Richard R. Green, and that the space at 26 Broadway should be used for the growing lower Manhattan student community, and asking that Millennium be allowed to expand there because it is successful, it addresses space needs and it is what the community wants.
10. Multiple commenters echoed assertions that the current Richard R. Green facility is inappropriate for high school students and negatively impacts their educational opportunities. Those commenters stated that the new facilities at 26 Broadway would increase student achievement at Richard R. Green.

11. Multiple commenters stated that Richard R. Green is doing wonderful things with its students. The commenters noted that the school offers 7 AP courses, and gets “great” results. Commenters noted that its students attend very selective colleges and are awarded many scholarships. Many have internships in elementary schools in the afternoon, and many alumni are currently teaching in New York City public schools.
12. Multiple commenters stated that the proposal, in conjunction with the proposal to re-site P.S. 151 to Richard R. Green’s current site, would address overcrowding on the Upper East Side and provide students of both schools would appropriate facilities. The commenters noted that both P.S. 151 and Richard R. Green have been waiting a long time for a permanent home.
13. One commenter stated that preparing future teachers should be a priority of the DOE and the City, and the proposal would improve both the school’s ability to educate and ability to recruit.
14. One commenter stated that the students at Richard R. Green are respectful and there has never been an incident of the sort that middle school parents at the new site are concerned about. Another commenter cited the students’ participation in the hearing as an indication of their pride in their school and how courteous they will be as neighbors.
15. Multiple commenters stated that despite support for finding a new home for both Richard R. Green and P.S. 151, there are not enough spaces for Millennium High School and screened programs in general.
 - a. The commenters stated that there must be another option for siting Richard R. Green so Millennium can expand into 26 Broadway.
 - b. The commenters opined that the school’s academic success and support from existing schools at 26 Broadway were cited as reasons to provide the space for a Millennium expansion.
 - c. One commenter mentioned that the space had been promised to Millennium in the past.
 - d. One commenter referred to statistics, citing higher demand figures for seats, higher attendance and higher college acceptance rate at Millennium than at Richard R. Green, and more suspensions at Richard R. Green. The commenter highlighted safety concerns as a result of the number of suspensions.
16. Multiple commenters expressed confusion or disappointment about the discussion of Millennium at the hearings, since they believed the DOE proposal that was the subject of the hearings has nothing to do with Millennium.
17. Multiple commenters stated that comparisons to Millennium were unfair and it should not be considered more deserving of the space at 26 Broadway than Richard R. Green. Richard R. Green is an unscreened school, unlike Millennium, which means it must work harder to support student achievement.
18. Multiple commenters felt that Richard R. Green students were judged stereotypically by the Millennium community and an article that appeared in the Tribeca Trib. The

commenters noted that Richard R. Green students consider themselves high performing and stated that the suspension numbers cited are as high as they are due to a strong disciplinary approach at the school; many are a result of cell phones and wearing hats. The commenters stated that students are respectful and looking forward to being a part of a community at 26 Broadway. They would like to explore the opportunity to collaborate with the Lower Manhattan Community Middle School, since the school provides teacher education preparation and many students currently intern at schools.

19. One commenter stated that they were dismayed to hear that other schools at 26 Broadway preferred to share space with Millennium, and expressed the opinion that Richard R. Green should not be sited at what the commenter characterized as an unsafe location like Norman Thomas.
20. One commenter stated that public education is the great equalizer. The commenter expressed the opinion that Richard R. Green's current location is not fair to students, and not having facilities for appropriate academic and extracurricular activities makes a difference in college admissions. The commenter stated that differences between Millennium and Richard R. Green students are not differences in abilities, but differences in opportunities.

Summary of Issues Raised in Written and/or Oral Comments Submitted to the DOE

21. Approximately 273 comments were received in support of the proposed re-siting. A petition with 364 signatures was also received in support of this proposal and the proposal to re-site P.S. 151 to Richard R. Green's current location. Reasons given were:
 - a. Richard R. Green is currently housed in a building intended for elementary school students, which negatively affects the students' educational opportunities.
 - b. Richard R. Green has been looking for a permanent home for 20 years.
 - c. A new, up-to-date facility intended for high school students would improve students' academic experience and success. Students need access to a modern computer lab, science labs, opportunities for extra-curriculars, and in particular, a gymnasium, which they lack in their current location.
 - d. Despite the longer commute for some students, parent and student satisfaction with the school is high and they are willing to accommodate.
 - e. The new zoning plan on the Upper East Side has been approved and will address overcrowding concerns for all schools in the district; it is dependent upon the approval of this proposal.
 - f. Comparisons between Richard R. Green and Millennium High School students are irrelevant; students at Richard R. Green are respectful, interested in giving back to the community as teachers, and deserving of an appropriate environment and resources.
22. One commenter opposed the proposal due to concerns about a longer commute and safety issues in the downtown community, due to the events of September 11, 2001 and the controversial mosque siting.

23. Approximately 290 commenters stated that Millennium should have the opportunity to expand to the space at 26 Broadway instead of Richard R. Green. Reasons cited were:
- a. Millennium was forced to accept more students than its space can handle, and is overcrowded and some classes are conducted in hallways. It needs more space for arts programs, AP courses and extracurriculars.
 - b. Millennium is a very successful school and, along with its principal, provides an example of what a high-quality New York City school should be. Millennium is more diverse than Richard R. Green, which is something the building seeks. Millennium does not represent one particular neighborhood or a group of influential parents. As such, it deserves the space.
 - c. There is a very high demand for excellent, screened schools. More students should have access to the Millennium program.
 - d. A downtown space ought to serve downtown students. The School Overcrowding Task Force helped convince the DOE to obtain the space at 26 Broadway for this purpose.
 - e. Millennium already has an established relationship with the schools at the 26 Broadway location.
 - f. Richard R. Green does not need to move until 2012, and the DOE has other options for siting it due to its proposed phase-out of other high schools. Some commenters also cited a New York Times article discussing the amount of new space and seats the DOE has obtained.
 - g. Millennium has no gymnasium and fitness options are inadequate. Physical education and sports are conducted in a ground floor room adjacent to a smoke shop, where the presence of cigar smoke is detectable.
 - h. Millennium was promised a gym and has been waiting for the appropriate space and opportunity for several years. Access to the two gymnasiums at 26 Broadway would solve that problem. Alternatively, there are funds available for the construction of the gym, and the project would be helpful to the economy.
 - i. One parent commented that Millennium had provided an excellent education for his child with an IEP.
 - j. The proximity of 26 Broadway to Millennium's current location makes it a logical choice for Millennium's expansion. It will be difficult to find another space downtown.
 - k. Richard R. Green students had 131 suspensions last year; the downtown neighborhood is not suitable for this type of student population, which will create difficulties for other schools, in particular the middle school sited at 26 Broadway.

**Analysis of Issues Raised, Significant Alternatives Proposed
and Changes Made to the Proposal**

Comments 1, 3-5, 10-14 and 21, a-d, are in support of the proposal and do not require a response.

With regard to comment 2, co-locations are necessary in order to make use of limited space most effectively. The DOE works with co-located schools and sets up appropriate systems to help schools collaborate.

With regard to comments 6, 7 and 8, the space at 26 Broadway is specifically designed for high school students. As a result, the DOE would seek to use the space to serve high school students whether or not this proposal is approved. In addition, there are many middle schools that are effectively co-located with high schools. Decisions about entering and leaving times, sharing the cafeteria and fire drills will be made by the Building Council, comprised of representatives from all schools in the facility. The number of school safety agents assigned to a building is determined in consultation with the School Safety Division of the NYPD. If it is deemed appropriate or necessary, more agents will be assigned.

With regard to comments 9, 15-20 and 23 a-k, the principal of Millennium High School submitted a proposal to create a new school, but that proposal was not approved. The space was discussed as a potential location by the principal and the community, but the DOE's new school application process does not involve applying for a specific space. The relationships between Millennium and the existing schools at 26 Broadway were developed despite not sharing a building; they can be maintained and continued within the current arrangement. Richard R. Green would like to develop relationships with existing schools at 26 Broadway, particularly the middle school, since its focus is on teaching and it currently works to provide its students with experiences and internships in other schools.

The DOE believes that the current proposals to re-site Richard R. Green and P.S. 151 best serve the overall needs of New York City public school students. These proposals support the approved re-zoning plan for District 2, which addresses overcrowding concerns throughout the Upper East Side.

The opening of a Millennium High School in Brooklyn addresses general concerns about demand and availability of high-quality screened high schools. Students at Millennium are not only downtown students; in fact, roughly 35% of them live in Brooklyn. Every eligible lower Manhattan student who was ranked by the school (as meeting its admissions criteria), and was not matched to a higher choice, got in. In the current freshmen class, 1,577 lower Manhattan students applied, 475 were ranked, 398 were matched to a school of higher choice, and 77 were offered a seat at Millennium. Twice as many lower Manhattan students could be accommodated, if students rank the school more highly or the school ranks more lower Manhattan students. Both Millennium and Richard R. Green have been operating without a dedicated gym. Millennium selects its students and was not forced to increase enrollment; however, this proposal does not mean that there will not be future efforts to address overcrowding and facilities concerns for Millennium. The achievement of Millennium students and suspension rates of Richard R. Green students are not deciding factors in space issues.

With regard to comment 22, the new location is situated close to multiple transportation options, including the 4 and 5 trains, which is the same line serving Richard R. Green's current site. The DOE believes the benefits of the site outweigh whatever transportation and security concerns might exist.

Changes Made to the Proposal

No changes have been made to this proposal as a result of public comment.