



Public Comment Analysis

Date: November 16, 2011
Topic: Proposed Extension of the Temporary Re-siting of P.S. 51 (02M051) in Building M816 Beginning in the 2011-2012 School Year
Date of Panel Vote: November 17, 2011

Summary of Proposal

On September 8, 2011, the New York City Department of Education (“DOE”) issued an Emergency Declaration temporarily re-siting P.S. 51 Elias Howe (02M051, “P.S. 51”), an existing zoned elementary school, from building M051, which is located at 520 West 45th Street in Manhattan’s District 2, to leased space at 323 East 91st Street, also in Manhattan’s District 2, known as “Our Lady of Good Counsel,” or building M816. The emergency re-siting took effect on September 8, 2011 and will be effective for six months. On October 3, 2011, the DOE issued an Educational Impact Statement (“EIS”) describing a proposal to extend the temporary re-siting of P.S. 51 until September 2013, at which point P.S. 51 would move to its new building, which is currently being constructed on property adjacent to the school’s former site.

On November 10, 2011, the DOE published an amended EIS that corrects the address of P.S. 51’s former site, clarifies the status of nearby construction projects that will be ongoing when P.S. 51 moves to the new site, and corrects typographical errors.

As stated in the Emergency Declaration, the re-siting is necessary for the health, safety, and general welfare of students. Currently, three major construction projects are taking place at sites adjacent to M051 property. Among these is a multi-year project to create a platform over the Hudson Rail lines adjacent to the school, on which a high-rise building will subsequently be built. Another nearby major construction project is the construction of a new facility for P.S. 51, which is taking place adjacent to the current building M051. In combination, the projects are expected to increase the noise levels surrounding the school building, affect air quality, and make the operation of P.S. 51 in building M051 impractical during the current and the 2012-2013 school years.

After extensive discussions with the school community and local elected officials, and efforts to mitigate the concerns while remaining in the M051 building, the DOE began to explore various ways to accommodate P.S. 51 in an alternate location until the construction of its new facility is completed. Building M816 is located approximately four miles from building M051 and was scheduled to be unused during the 2011-12 school year. While M816 is not in the immediate neighborhood of P.S. 51, it is located in District 2, and is the only building in District 2 with sufficient space to

accommodate all grades of P.S. 51 in one location. Other sites closer to the P.S. 51 building would have required split-siting the school in two locations, with both pieces co-located with other schools.

The DOE anticipates completion of P.S. 51's new facility by September 2013, though construction on the other projects adjacent to the school is expected to continue beyond that time. Nonetheless, P.S. 51 will move to its new building upon its completion in September 2013. At that time, the increase in noise levels and the impact on air quality will have subsided because construction on the new P.S. 51 facility will be completed. Nearby construction will largely be internal to the new structures, which is less noisy and creates fewer air quality issues than excavation work.

P.S. 51 is a zoned district elementary school that serves 334 students in kindergarten through fifth grade. While P.S. 51 had offered a pre-kindergarten program in its former location, it will not offer a pre-kindergarten program while it is located in building M816.

In a separate EIS published on October 3, 2011, the DOE proposed to open a new zoned district elementary school (02MTBD, "New School") beginning in September 2012 in building M816. If that EIS is approved, New School would offer a kindergarten class at M816 in 2012-2013, and would eventually expand to serve kindergarten through fifth grade.

If these two proposals are approved, New School would be temporarily co-located in M816 with P.S. 51 during the 2012-2013 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. If these proposals are approved, the combined enrollment in 2012-2013 of New School and P.S. 51 at M816 would be approximately 340-445 students, yielding a building utilization rate of 89-117%. (The concept of "utilization rate" is explained in the EIS.)

As noted, currently, the DOE plans to move P.S. 51 from M816 to its new permanent site adjacent to its former site in building M051 after the 2012-13 school year. If P.S. 51's new site is not ready at that time, the DOE would issue a separate EIS describing alternate siting plans for P.S. 51.

M816 is a leased facility with one year remaining on the lease. The lease on this facility expires August 31, 2012. The DOE is in active discussions with the Archdiocese of New York to obtain a long-term lease on this facility. If the DOE is not successful in obtaining a long-term lease on M816, future plans for New School and P.S. 51 would be proposed in a separate EIS.

The details of this proposal have been released in an Educational Impact Statement which can be found on the Department of Education's Web site:
<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/Nov2011Proposals.htm>.
Copies of the EIS are also available in the main office of P.S. 51.

Summary of Comments Received at the Joint Public Hearings

A joint public hearing regarding both the proposed temporary re-siting of P.S. 51 and the proposed opening of a new zoned district elementary school and temporary co-location with P.S. 51 in building M816 was held at building M816 on November 2, 2011. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 60 members of the public attended the hearing, and 23 people spoke, mainly regarding the opening of a new zoned district elementary school in building M816. (A summary and analysis of the

comments related to the new school proposal is available at <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/Nov2011Proposals.htm>). Present at the meeting were Community School District 2 Superintendent Mariano Guzmán; District 2 Community Education Council (“CEC 2”) President Shino Tanikawa; CEC 2 Representative Tamara Rowe; P.S. 51 Principal Nancy Sing-Bock; P.S. 51 School Leadership Team (“SLT”) Chair Lauren Miller; Shelby Garner, representing U.S. Representative Carolyn B. Maloney; Kristen Ellis, representing Manhattan Borough President Scott Stringer; Ricky Gunsberg, representing New York State Assemblymember Micah Kellner; Matthew Walsh, representing New York State Assemblymember Dan Quart; and Michelle Feldman, representing New York City Councilmember Jessica Lappin.

The following comments and remarks related to the P.S. 51 proposal were made at the joint public hearing on November 2, 2011:

1. CEC 2 President Shino Tanikawa commented as follows:
 - a. She expressed the opinion that the DOE listened to the community about temporarily re-siting P.S. 51.
 - b. She noted that the projections for enrollment growth at New School in the EIS shows an increase in enrollment between grades three and four in the 2016-2017 school year, and asked why the cohort’s enrollment increases and on what the projections are based.
 - c. She expressed the opinion that the EIS does not truly describe the impact co-location and re-siting have on children and academics. For example, issues arising from scheduling shared space takes away attention from teaching or starting lunch early is sometimes required by co-location.
2. P.S. 51 SLT Chair Lauren Miller asserted that if the sixth floor renovations are not completed in time for the 2012-2013 school year, there would not be enough room for New School to fit in the building, because all currently available space is needed for P.S. 51. She also noted that construction has not yet begun.
3. P.S. 51 Principal Nancy Sing-Bock asserted that:
 - a. The 2010-2011 school year was very difficult in the former school site because of the numerous construction projects on the block. Many people helped make the move for the safety and health of P.S. 51 students.
 - b. There are concerns about when the sixth floor renovations will be started and completed. They have not started yet.
 - c. The two schools can work out how to share the gymnasium and cafeteria.

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

The DOE did not receive any written or oral comments regarding the proposal.

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

Comment 1a supports the proposal, and thus does not require a response.

Comment 1b:

This will be addressed in the analysis of public comment for the proposal to open New School, available at <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/Nov2011Proposals.htm>

Comment 1c:

There are currently hundreds of schools in buildings across the City that are co-located. In all cases, the Instructional Footprint is applied to all schools in the building to ensure equitable allocation of classroom, resource and administrative space. In this case, P.S. 51 was informed about the one year co-location as a condition of their temporary relocation to M816, and the principal is committed to working collaboratively with New School to ensure student needs are met and shared spaces are scheduled to accommodate student needs appropriately.

Comments 2 and 3:

The renovations of the sixth floor are expected to be made over the summer of 2012 in order to minimize disruption for P.S. 51. The SCA and its consultants have visited the M816 building on several occasions to begin design and scope the project. The SCA previously renovated the fifth floor of the building over the summer of 2010, and completed renovations of the basement and first through fourth floors between May and beginning of school in 2009. Based on the similarity to the 2010 renovations of the fifth floor, and the time available for design and planning, the DOE is confident the sixth floor will be complete in time for P.S. 51 to relocate some of its classrooms to this floor for the beginning of school in September 2012.

The other comments received do not require a response.

Changes Made to the Proposal

No changes were made to the proposal.