



CITY OF NEW YORK

**MANHATTAN COMMUNITY BOARD FOUR**

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**COREY JOHNSON**  
Chair

**ROBERT J. BENFATTO, JR., ESQ.**  
District Manager

February 23, 2012

Amanda M. Burden, FAICP  
Director  
Department of City Planning  
22 Reade Street  
New York, New York 10007

Lorraine Grillo  
President & Chief Executive Officer  
NYC School Construction Authority  
IDCNY Center 1  
30-30 Thomson Avenue  
Long Island City, NY 11101

**Re: CEQR Reform & Public Schools**

Dear Ms. Burden and Ms. Grillo:

Manhattan Community Board 4 (MCB4) respectfully requests that the Department of City Planning (DCP) reevaluate the current City Environmental Quality Review (CEQR) multipliers for estimating public school students and screening level assessment guidelines and thresholds which determine whether detailed study on potential school impacts will be necessary.

Community District 4 continues to experience an increase in residential construction and influx of new families. Such an increase in the residential population is accompanied by an increased need for community and social services, such as parks, police services, emergency care and schools. A quality public education is a right that should be afforded every current and new resident in our district. Overcrowding continues to be a concern in schools in Community Education Council District 2.

Currently, the 2010 *CEQR Technical Manual* calculates new residential units to yield 0.55 K-8 for public school children in the Bronx but only estimates 0.16 children per unit in Manhattan.<sup>1</sup>

Such CEQR formulas used to calculate school seats for new residential development are based on outdated assumptions and contribute to inadequate planning for public school capacity. The current CEQR formula is inherently flawed because it only requires residential projects that generate 50 or more elementary/intermediate school students or generate 150 or more high school students to conduct detailed analyses.<sup>2</sup> The spirit of CEQR is to study and mitigate potential impacts that construction may have on public schools and other community facilities and assess whether there would be insufficient seats available to serve the projected population.

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<sup>1</sup> Chapter 6, Table 6-1a

<sup>2</sup> *CEQR Technical Manual*, Chapter 6, Table 6-1

All new residential construction and residential conversions, regardless of size, can potentially increase the school age population. Disappointingly, under the current CEQR formulas, only residential projects with a minimum of 310 units are required to conduct a detailed analysis of the potential impact on a public elementary or middle school in Manhattan.<sup>3</sup> Multiple projects that individually do not trigger a detailed analysis nonetheless can, in an aggregate, have a significant impact on the school age population and increase the demand for public school seats.

Manhattan Community Board 4 urges the Department of City Planning to expand current formulas to include all available residential data and adopt a mechanism that requires developers of residential buildings of any size to contribute to a capital fund for public schools. We are confident that the incorporation of all residential construction and residential conversions into CEQR screening level assessment guidelines and thresholds will help provide more reliable data on which further detailed school impact studies may faithfully depend.

Thank you for your esteemed consideration.

Sincerely,

A handwritten signature in blue ink, appearing to be 'CJ', is written below the word 'Sincerely,'.

Corey Johnson  
Chair

cc: Christine Quinn, Speaker NYC Council  
Dennis Walcott, DOE  
Shino Tanikawa, CECD2  
The Office of Portfolio Development, DOE

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<sup>3</sup> Ibid