

Public Comment Analysis

Date: October 29, 2013

Topic: The Proposed Opening and Co-location of New High School 30Q335 with Long Island City High School (30Q450) and P.S. 993 Queens (75Q993) in Building Q452, Beginning in 2014-2015

Date of Panel Vote: October 30, 2013

Summary of Proposal

On September 12, 2013, the New York City Department of Education (“DOE”) issued an Educational Impact Statement (“EIS”) describing a proposal to open and co-locate 30Q335, a new district Career and Technical Education (“CTE”) high school, in building Q452 (“Q452”) located at 14-30 Broadway, Queens, NY 11106, within the geographical confines of Community School District 30 (“District 30”). CTE programs integrate academic study with workforce skills in specific career clusters. Students receive instruction in an industry-related area and have the opportunity to graduate high school with industry-specific competencies and skills that lead to postsecondary education, further industry training and/or entry into the workforce. The proposed new high school, 30Q335, will likely offer CTE programming in the Information Technology career cluster, as described in more detail below. If this proposal is approved, 30Q335 will be co-located in building Q452 with Long Island City High School (30Q450, “LIC”), an existing high school serving students in ninth through twelfth grade, and one site of P.S. 993 Queens (75Q993, “P993@H450”), a District 75 (“D75”) school serving students in grades nine through twelve. In addition, Q452 houses a Living for the Young Family through Education (“LYFE”) program, a School Based Health Center (“SBHC”) program, a program with the School of Cooperative Technical Education (“Co-op Tech”), and two community based organizations (“CBOs”), United Way and St. John University’s GEAR UP. 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.

This EIS has been amended to reflect that the planned enrollment reduction will not impact the admissions methods or policies of any of the programs LIC currently offers, including the zoned program. As indicated in the original EIS, this proposal is not anticipated to impact LIC’s ability to accommodate all of the zoned students who apply to LIC’s zoned program. Additionally, this amended EIS clarifies the status of building projects listed in Section VII.

P993@H450 is projected to serve approximately 40 students in grades nine through twelve who are classified as intellectually disabled (“ID”) under an Individualized Education Program (“IEP”) in Self-Contained (“SC”) sections in 12:1:1 classroom settings (ratio of students: teacher: paraprofessional). Students are placed in D75 programs based on their individual needs and recommended special education services and are referred to D75 during a period that extends into summer.

Currently, the DOE is planning to reduce the enrollment at LIC over a period of four years beginning in September 2014. By 2017-2018, enrollment at LIC will decrease by approximately 420-460 students so that it will serve 1,935-1,975 students at scale in ninth through twelfth grade. The enrollment reduction is intended to provide an opportunity for LIC to concentrate on a smaller cohort of students, and allow for a

new school option to develop in building Q452. The DOE does not anticipate reducing LIC's enrollment if this proposal to co-locate 30Q335 is not approved.

The proposed co-location of 30Q335 in building Q452 is part of the DOE's central goal to create new school options that will better serve future students and the community at large and to provide another option in the Q452 building. 30Q335 will be open to students through the Citywide High School Admissions Process and will have a limited unscreened selection method with priority for students residing in Queens.

According to the 2011-2012 Enrollment Capacity Utilization Report ("Blue Book"), building Q452 has a target capacity of 2,156 students. During the current 2013-2014 school year the building is serving a total of approximately 2,524 students, yielding an estimated building utilization rate of 117%.

If this co-location proposal is approved, 30Q335 will gradually phase into Q452 while LIC simultaneously scales back its enrollment. The new school will serve students in ninth grade beginning in the 2014-2015 school year and will add one grade level every year until reaching its full grade span of ninth through twelfth grade in the 2017-2018 school year, when it will serve approximately 420-460 students. In 2017-2018, once LIC has completed its enrollment reduction and 30Q335 has reached full scale, it is projected that there will be approximately 2,387-2,483 students served in Q452, yielding an estimated building utilization rate of approximately 111%-115%. Although a utilization rate in excess of 100% may suggest that a building will be over-utilized or over-crowded in a given year, this rate does not account for the fact that rooms may be programmed for more efficient or different uses than the standard assumptions in the utilization calculation, as described below.

The details of this proposal have been released in an Amended Educational Impact Statement ("EIS"), which can be accessed here: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2013-2014/Oct30SchoolProposals>.

Copies of the amended EIS are also available in the main offices of LIC and P993@H450.

Summary of Comments Received

A joint public hearing regarding the proposal was held at building Q452 on October 23, 2013. At the hearing, interested parties had the opportunity to provide input on the proposal. Approximately 350 members of the public attended the hearing and 71 people spoke. Present at the meeting were: Queens High School Community Superintendent Tamika Matheson; DOE representative Gregg Bethel; District 30 Community Education Council ("CEC 30") President Rachel Paster; CEC 30 representative Irving Torres; Aliya Rasool representing the Citywide District 75 Council; Vivian Selenikas, Principal of LIC; Vladimir Hurych, Ken Achiron, Peter Muhlbach, Maria Karaiskos, Tracey Brown, Anita O'Brien, Cassandra Swan, Osvaldo Luna, Divya Ramdath, and Erin Ramgulam representing the LIC School Leadership Team ("SLT"); Jane Blumer representing the P993@H450 SLT; State Senator Michael Gianaris; Assembly Member Aravella Simotas; Assembly Member Catherine Nolan; Dmytro Fedkowskyj, Queens Representative on the Panel for Educational Policy; District Leader and Democratic Nominee for City Council, Costa Constantinides; Michael Mallon representing Council Member Daniel Dromm; Deborah Tharrington representing Council Member Jimmy Van Bramer; and Jillian Roland and Savita Iyengar from the DOE's Division of Portfolio Planning.

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

1. CEC 30 President Rachel Paster spoke against the proposed co-location and asserted the following:
 - a. She expressed support for LIC, stating that LIC offers a diverse student body, 26 AP courses in addition to numerous advanced regents courses, that graduation rates are increasing, that the school was rated effective/proficient by the SED, and that the new leader is turning around the school.
 - b. She expressed concern that LIC's programmatic and extra-curricular offerings would be minimized or taken away as a result of the co-location and as enrollment decreases.
 - c. She stated that no one asked for a new school in LIC.
 - d. She expressed concern that the DOE portrays LIC as a failing school.
 - e. She stated that the community does not even know what type of school would open in the Q452 building since the EIS says the school will likely offer CTE programming.
 - f. She stated that the new school would not offer AP courses, advanced regents, band, orchestra, sports teams, robotics team, or CTE-certified courses.
 - g. She expressed concern that the proposal would negatively impact students if LIC is not able to offer the same extra-curricular activities under this proposal.
 - h. She stated that CEC 30 opposes this proposal.
2. CEC 30 representative Irving Torres expressed opposition to the proposed co-location and asserted the following:
 - a. He expressed concern about the impact of this proposal on the classes and clubs offered at LIC.
 - b. He expressed concern about the uncertainty around the proposed new school and new students in the building.
 - c. He expressed support for LIC and the extra-curricular activities the school offers.
 - d. He expressed support for the LIC leadership and stated that LIC is improving.
 - e. He stated that many students feel that LIC is their home.
 - f. He expressed concern about teachers being excessed as a result of this proposal.
3. State Senator Michael Gianaris expressed opposition to the proposed co-location and asserted the following:
 - a. He stated that he strongly opposes the proposed co-location.
 - b. He stated that the DOE tries to destroy LIC every year.
 - c. He stated that LIC is getting better.
 - d. He expressed concern that LIC is already overcrowded.
 - e. He asked why the DOE is proposing this when there will be a new Administration.
 - f. He stated that nobody wants the proposal, and that he has not heard a single argument for this proposal.
4. Assembly Member Aravella Simotas expressed opposition to the proposed co-location and asserted the following:
 - a. She said that it is not fair to put students in an overcrowded school.
 - b. She asked why the DOE does not reduce overcrowding at LIC by investing creative space ideas at LIC.
 - c. She stated that nobody wants this change.
 - d. She stated that LIC is on the rise, and that the DOE should continue to invest in LIC.
 - e. She expressed concern about reducing classes and programs and the impact of this on a student's education.
5. Assembly Member Catherine Nolan expressed opposition to the proposed co-location and asserted the following:
 - a. She stated that Info Technology high school is a few blocks from LIC.

- b. She asked why the DOE is proposing to co-locate a small school in a comprehensive community school.
 - c. She expressed support for the leadership of LIC and the many programs offered at LIC.
 - d. She expressed concern about the impact of the proposed co-location on LIC.
 - e. She stated that LIC serves OTC students well.
 - f. She stated that LIC did not receive 100% of their FSF funding.
 - g. She stated that an enrollment reduction does not help students.
 - h. She requested that the DOE withdraw the proposal and instead give the leadership of LIC time and resources to improve the school.
 - i. She expressed support for opening additional programs at LIC instead of opening a new school.
6. Michael Mallon representing Council Member Daniel Dromm stated that parental involvement is important for a school's success and that translation of the EIS did not allow sufficient time for families to review the proposal.
7. Deborah Tharrington representing Council Member Jimmy Van Bramer expressed opposition to the proposed co-location and stated the following:
 - a. She expressed concern about the impact of this proposal on LIC's community, students, families, and teachers.
 - b. She stated that the community did not have sufficient time to review the proposal in advance of the joint public hearing.
 - c. She urged the DOE to reevaluate the proposal.
8. Dmytro Fedkowskyj, Queens Representative on the Panel for Educational Policy, expressed opposition to the proposed co-location and stated the following:
 - a. He stated that this is not a sound proposal and that it has more flaws than benefits.
 - b. He expressed support for the leadership at LIC.
 - c. He asked why the DOE is not implementing the proposed new school's CTE program in LIC, instead of co-locating a new school in the building.
 - d. He stated that choice for a select group of students would punish thousands of children.
 - e. He stated that the Mayor is giving his agenda to the next Administration.
 - f. He expressed concern that this proposal does not reduce overcrowding in LIC.
 - g. He expressed concern that this proposal would impact programs at LIC, even though the EIS says otherwise.
 - h. He stated that he will vote against this proposal on October 30th.
9. District Leader and Democratic Nominee for City Council, Costa Constantinides, expressed opposition to the proposed co-location and asserted the following:
 - a. He stated that the Bloomberg Administration has been unfair to students in LIC.
 - b. He stated that no one in the community supports the proposed co-location.
 - c. He expressed concern about the DOE's engagement with the community around this proposal, specifically that the joint public hearing was scheduled a week before the PEP vote.
 - d. He stated that Bloomberg will no longer be in office when the proposed new school will take effect.
 - e. He urged the DOE to reconsider the proposal and instead have a conversation with the LIC community.
10. Ken Achiron read a letter on behalf of Council Member Peter Vallone that expressed opposition to the proposed co-location, and asserted the following:
 - a. He stated that Q452 is overcrowded and some students arrive at 7am for school.

- b. He asked that the DOE withdraw the proposal from the PEP agenda until everyone agrees what should be done to improve education at LIC.
11. Vivian Selenikas, Principal of LIC, expressed support for staff and students in the LIC building.
12. Representatives from student leadership at LIC expressed opposition to the proposed co-location and asserted the following:
 - a. They expressed support for LIC and the many programs it offers.
 - b. They expressed concern that LIC would lose funding as a result of this proposal and this would impact the school's ability to continue offering the same programming and extra-curricular activities.
 - c. They expressed concern that the proposed co-location would negatively impact LIC's environment.
 - d. They expressed concerns about overcrowding as a result of the co-location.
 - e. They expressed concerns about staff being excessed as a result of this proposal.
 - f. They asked that funding for the new school be given to LIC to support its programming.
 - g. They expressed support for the diverse student body at LIC.
 - h. They stated that the LIC community stopped turnaround in 2011-2012.
 - i. They expressed concerns about competition between LIC and the proposed new school.
 - j. They asked about the rationale for this proposal given LIC's improved performance.
13. LIC SLT representative Tracey Brown expressed opposition to the proposed co-location and asserted the following:
 - a. She stated that the LIC SLT unanimously opposes the proposed co-location.
 - b. She expressed concern that LIC would have fewer resources, fewer programs, and fewer AP classes as a result of the proposal.
 - c. She stated that the DOE would like to displace zoned students and bring in other students.
 - d. She expressed concern that LIC's success would be jeopardized by this proposal.
 - e. She stated that the DOE is using old data from 2011-2012 in the EIS, but there are new structures at LIC.
 - f. She expressed support for LIC's new leadership, and the school's AP and CTE classes.
14. LIC SLT representative Peter Muhlbach expressed opposition to the proposed co-location and asserted the following:
 - a. He stated that the EIS has not been translated, and that 61% of families at LIC speak Spanish.
 - b. He expressed concerns about the timeline for this proposal.
 - c. He stated that NYC needs more school buildings, and mentioned that there is a lot of property in Long Island City for a new school building for the proposed new school.
 - d. He requested that the DOE invest in LIC and not a new school, saying that the DOE should increase the capacity of existing schools to prepare students for college.
 - e. He asked if LIC would be allowed to take back space in the building if it needs more space or if the proposed new school were smaller than projected.
15. LIC SLT representative Divya Ramdath expressed opposition to the proposed co-location and asserted the following:
 - a. She expressed concern about the current overcrowding at LIC and the logistics of the proposed co-location.
 - b. She stated that LIC's resources would be limited if this proposal were approved.
 - c. She expressed support for the leadership of LIC and the many programs offered at LIC.
 - d. She stated that the co-location at Flushing High School is not going smoothly, and that there is tension between students.
 - e. She expressed concern about the impact of this proposal on LIC's environment.

16. LIC SLT representative Erin Ramgulam expressed opposition to the proposed co-location and asserted the following:
 - a. He expressed support for the LIC leadership and stated that LIC has met SED targets to move the school from a priority school designation.
 - b. He expressed concern that LIC would lose teachers and students under this proposal.
 - c. He stated that the building is only for LIC students.
 - d. He stated that the community does not support this.
17. LIC SLT representative Maria Karaiskos expressed opposition to the proposed co-location and asserted the following:
 - a. She stated that the DOE has not done outreach to the community.
 - b. She stated that the EIS should be translated into Spanish 45 days before the PEP vote.
 - c. She stated that over 1,500 community members signed a petition against this co-location proposal.
18. LIC SLT representative Ken Achiron expressed opposition to the proposed co-location and asserted the following:
 - a. He stated that LIC's enrollment and utilization in the EIS is inaccurate, and that there are 2,610 students on LIC's register.
 - b. He asked about the rationale for this proposal if the DOE is intervening for High Schools with 29% graduation rates, and LIC's graduation rate has increased to 61%.
 - c. He stated that LIC offers personalized instruction through its small learning communities.
 - d. He expressed support for the LIC faculty and college readiness programs.
 - e. He asked about DOE rationale for proposing to open a new CTE school with an information technology career focus when there is an Information Technology high school nearby.
 - f. He expressed concern that multiple bell schedules will be confusing for students enrolled at LIC, P993@H450, and the new school.
 - g. He expressed concern about the impact of the proposal on LIC's ability to offer the classes and programs it currently offers.
 - h. He stated that enrollment decline at LIC may not be due to low demand: In 2007, LIC asked for lower enrollment to manage overcrowding, and every year parents of students at LIC are given letters expressing that they have the right to have their child go elsewhere but very few parents request to transfer out.
 - i. He stated that nobody in the community wants this, and that there are 1,542 signatures and 15 pages of comments on a petition against this proposal.
19. LIC SLT representative Anita O'Brien expressed opposition to the proposed co-location and asserted the following:
 - a. She stated that the DOE has proposed changes to LIC over the past six years that will not benefit students.
 - b. She stated that LIC has shown progress.
 - c. She stated that families chose LIC as opposed to a smaller school because of the academic and extra-curricular options the school offers, and expressed concern that a co-location would reduce these options.
20. Citywide District 75 Council representative Aliya Rasool expressed opposition to the proposed co-location and asserted the following:
 - a. She expressed concern about overcrowding in the Q452 building, and the safety of adding another school to the building.
 - b. She asked why the DOE doesn't leave this decision up to the new Mayor.

21. Janeylla Hines representing the United Federation of Teachers expressed opposition to the proposed co-location and asserted the following:
 - a. She stated that there was a lack of translation of the EIS.
 - b. She expressed concern that the proposed new school is similar to Information Technology High School in the neighborhood.
 - c. She stated that she stands with the community, parents, and businesses in opposing this proposal.
22. James Vasquez representing the United Federation of Teachers expressed opposition to the proposed co-location and asserted the following:
 - a. He asserted that the Mayor is trying to fulfill a political promise he made to open 200 new schools.
 - b. He stated that the Mayor's educational policies have failed.
 - c. He expressed support for the LIC community, stating that communities working together is what works.
23. A representative from the Council of Administrators and Advisors expressed opposition to the proposed co-location stating that another school would compete for resources with LIC and asked that the DOE invest resources into improving LIC instead of into a new school.
24. Multiple commenters expressed support for LIC's leadership, teaching staff, diverse student body, diverse academic and extra-curricular offerings, and the LIC community.
25. Multiple commenters expressed concern that LIC would lose teachers as a result of this proposal.
26. Multiple commenters expressed concern about the impact of this proposal on LIC's budget and ability to offer many classes and extra-curricular options.
27. Multiple commenters expressed concern about the impact of this proposal on LIC's AP classes.
28. Multiple commenters stated that LIC is improving.
29. Multiple commenters referred to the DOE's turnaround efforts, and stated that this proposal is a response to turnaround.
30. Multiple commenters expressed concerns about the bell schedules for three schools in the LIC building.
31. A commenter stated that the proposed new school is not certified by the SED.
32. Multiple commenters asked why the DOE does not open a CTE program in LIC instead of a new CTE school.
33. Multiple student commenters stated that they felt that the DOE was destroying their second home.
34. Multiple commenters expressed opposition to the co-location.
35. Multiple commenters stated that small schools offer limited academic and extra-curricular options for students.
36. A commenter expressed concern about overcrowding in hallways during transitions between classes.
37. A commenter stated that the variety of programs offered at LIC positively impacts student learning, engagement, and graduation rate, and expressed concern about giving up space for these programs.
38. A commenter stated that LIC just got a great Quality Review.
39. A commenter stated that the DOE is closing LIC.
40. A commenter expressed concern with the logistics of co-location, stating that there are six schools co-located in Washington Irving High School and it is difficult to reserve space in the auditorium in a co-located school.
41. A commenter stated that LIC's AP Spanish classes have success rates above the national average.
42. Multiple commenters expressed concern about the timeline for translating the EIS, and the fact that the EIS was not translated in Arabic or Bengali.

43. A commenter stated that the proposed new school would enroll students from other boroughs.
44. Multiple commenters stated that the DOE should give resources to LIC.
45. Multiple commenters asked the DOE to build a new school building, stating that there is real estate in the area.
46. A commenter expressed concerns that some students had to leave at 8:00pm and were not able to speak at the joint public hearing.
47. A commenter stated that students who are trying to register for LIC over-the-counter are being denied admission to the school.
48. The SLT of LIC submitted a petition with approximately 1,542 signatures urging the DOE to stop the proposed co-location:
 - a. The petition urges the DOE to expand LIC's CTE programs.
 - b. The petition states that the DOE has cut LIC's budget by \$3,000,000 and as a result staff have been excessed, and programs have been eliminated.
 - c. The petition states that students from two different schools will compete inside one building for limited resources.
49. Students of LIC produced videos highlighting programming at the school, which were projected for the public throughout the hearing.

The following questions were asked as part of the question and answer section of the joint public hearing on October 23rd, 2013:

50. A commenter asked whether students enrolled in LIC can transfer to the proposed new school.
51. A commenter asked how the new school would benefit the LIC community.
52. A commenter asked why the DOE is proposing to open a new school instead of opening a new program at LIC.
53. A commenter asked whether anything said at the joint public hearing will be brought to the DOE.
54. A commenter asked how the DOE reviews comments made at the joint public hearing.

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

55. The DOE received multiple calls, written comments, and oral comments expressing opposition to the co-location:
 - a. Multiple commenters expressed support for LIC's leadership, diverse community, and/or variety of academic and extra-curricular programs.
 - b. Multiple commenters expressed concern that the co-location would negatively impact programs offered at LIC.
 - c. Multiple commenters expressed concerns that LIC is already overcrowded and that there would be more overcrowding in the hallways as a result of the co-location.
 - d. Multiple commenters expressed concerns about the safety of the co-location.
 - e. Multiple commenters expressed concerns about the impact of a co-location on the LIC environment, stating that co-location would cause tension between students.
 - f. Multiple commenters expressed concern that many families in the community speak Spanish, and that the community was not notified of this proposal in a timely manner.
 - g. Multiple commenters expressed concerns that an added administration would take up space that could be used as classrooms.
 - h. Multiple commenters suggested that the new CTE program be added to LIC instead of opening a new school.
 - i. Multiple commenters expressed concern that instability at LIC negatively impacts the school community.

- j. Multiple commenters expressed concern about the impact of this proposal on LIC's resources.
 - k. Multiple commenters encouraged the DOE to listen to the community.
 - l. Multiple commenters expressed concern that LIC would lose teachers as a result of this proposal.
 - m. Multiple commenters stated that LIC is providing critical educational services to Hispanic students that they would not otherwise receive.
 - n. Multiple commenters expressed concerns that the Q452 building does not have adequate facilities for an information technology high school.
 - o. A commenter stated that LIC is dangerous.
 - p. Multiple commenters stated that Charter schools should pay to use DOE resources and should not be in LIC.
 - q. A commenter wrote that the US Department of Education should be abolished.
 - r. A commenter wrote that the proposal would entail closing the Culinary Arts program at LIC.
 - s. A commenter asked whether the CTE program at the proposed new school is SED approved.
 - t. The SLT clarified the status of the building projects for the Q452 building as of September 23rd.
 - u. Multiple commenters asked about the rationale for this proposal.
 - v. A commenter asked about Urban Assembly.
 - w.
56. The PA President of LIC submitted a letter expressing opposition to the proposed co-location:
- a. She wrote that LIC is beginning to improve, and that the administration needs time to implement change.
 - b. She stated that LIC is already at capacity.
 - c. She noted that turnaround and the naming of LICHS as Global Scholars Academy of Long Island City in the 2013-2014 High School Directory was confusing to families and thus had an effect on applications to LIC.
 - d. She asked if the Q452 building would get repairs if this proposal is approved and expressed concern that repairs during the school year would negatively affect and inconvenience students. Specifically, she noted that air conditioning and computer wiring are issues, particularly for an information technology school that would rely on wireless systems in the building.
 - e. She expressed concern about translations of the proposal being released in a timely manner.
 - f. She suggested that the new CTE program be added to LIC instead of co-locating a new school in the building.
 - g. She stated that Information Technology High School is in the area and families would choose this school if they were interested.
57. Queens Borough President Helen Marshall submitted a letter expressing concern about community engagement and notification for the proposal, and stating that building Q452 was closed for repairs during the summer.
58. State Senator Michael Gianaris submitted a letter expressing opposition to the co-location proposal:
- a. He expressed support for the new leadership of LIC.
 - b. He expressed concerns that opening a new school in the building would negatively impact LIC's progress.

- c. He expressed concern about co-locating a new school in a building that is currently overcrowded.
 - d. He expressed general support for opening career and technical education programming in different buildings in western Queens.
59. Assembly Member Aravella Simotas submitted a letter expressing opposition to the co-location proposal:
 - a. She expressed support for the new leadership of LIC.
 - b. She expressed concerns that opening a new school in the building would negatively impact LIC's progress.
 - c. She expressed concern about co-locating a new school in a building that is currently overcrowded.
 - d. She expressed general support for opening career and technical education programming in different buildings in western Queens.
 - e. She expressed concerns about community engagement about this proposal, stating that it was announced over the summer and that it was only presented in English.
60. Assembly Member Catherine Nolan submitted a letter expressing opposition to the proposed co-location:
 - a. She stated that LIC is improving and this proposal would have a negative impact on LIC.
 - b. She expressed concern that the proposal was shared in June, and stated that the community will not have adequate time to evaluate the proposal.
 - c. She stated that LIC is overcrowded and a co-location will add to this problem.
 - d. She stated that a CTE school in LIC would undermine LIC's CTE programming.
61. Assembly Member Catherine Nolan submitted a letter stating that over 60% of LIC's population is native Spanish speakers and requesting that the hearing be postponed since translations of the proposal were not available in Spanish by September 27th.
62. Council Member Jimmy Van Bramer submitted a letter expressing concern about the timeline for this proposal:
 - a. He expressed concern that the proposal would negatively impact the programming and environment at LIC.
 - b. He expressed concern that the community was not given sufficient time to consider this proposal in anticipation of the October 23 joint public hearing.
 - c. He expressed opposition to the co-location proposal.
63. Council Member Peter Vallone submitted a letter expressing opposition to the proposed co-location, stating that this location is not appropriate considering LIC's overcrowding.
64. Rachel Paster, President of CEC 30, submitted a letter demanding that the joint public hearing be moved and that the PEP vote be postponed due to the fact that the EIS was not filed in a language accessible to at least half of the LIC population until October 8, 2013. She added that the DOE's failure to comply with Chancellor's Regulation A-190 II.B and II.C is likely to render invalid any PEP decision made in violation of the Chancellor's Regulations.
65. UFT President Michael Mulgrew submitted a letter urging the DOE to move the hearing window due to the fact that the EIS was not translated in a timely manner even though 61% of families with children at LIC primarily speak Spanish.
66. Council Member Daniel Dromm submitted a letter demanding that the joint public hearing be moved and that the PEP vote be postponed due to the fact that the EIS was not filed in a language accessible to at least half of the LIC population until October 8, 2013. He added that the impacted school community should not be subject to a rushed process because translated EIS statements were not issued in a timely manner.

67. A representative of CEC 30 submitted a written comment expressing concern that the PEP does not have sufficient time prior to their vote to read proposals and public comment analysis and make informed decisions.
68. The DOE received a written comment from the Office of the NYC Public Advocate Bill de Blasio asking that the DOE review the following concerns expressed by the LIC community:
 - a. The comment expresses concerns that the EIS was not made available in Spanish until early October and this could be a violation of Chancellor's Regulations.
 - b. The comment expresses concern that the amended EIS should be amended to reflect that the Fire Alarm System Project has been placed on hold until funding becomes available.
69. Ken Achiron representing the LIC SLT submitted written comments expressing opposition to the proposed co-location, including the petition described above submitted during the joint public hearing, letters from elected officials described in this Public Comment Analysis, and SLT comments on the proposed co-location. The SLT comments assert the comments stated by LIC SLT representative Tracey Brown at the joint public hearing, as well as the following:
 - a. The SLT provided examples of ways LIC's performance and environment are improving such as increased graduation rates, increased credit accumulation, an effective/Proficient rating by the SED, a Proficient QR, reduced safety incidents, and an improved school environment.
 - b. The SLT expresses support for LIC's professional development schedule, small learning communities, and programming.
 - c. The SLT states that few students request to transfer out when they are given a letter explaining that parents have the right to move to another high school.
 - d. The SLT expresses concerns that the enrollment and performance data used in the Educational Impact Statement is outdated.
 - e. The SLT expresses support for LIC's college and career programming, including 26 AP courses, and state-certified CTE courses.
 - f. The SLT expresses concern that electives at LIC will be impacted, which contradicts the Chancellor's NYC Advanced Placement Initiative.
 - g. The SLT expresses concern that the DOE did not do outreach to the community and does not listen to the community.
 - h. The SLT expresses concern that the EIS was not translated in a timely manner for Spanish-speaking families at LIC, and states that this appears to be in violation of Chancellor's Regulation A-663, as well as CR part 154 regarding Limited English Proficient students.
 - i. The SLT asks about the rationale for this proposal, stating that this proposal does not fit the Chancellor's vision for NYC schools.
 - j. The SLT expresses concern that details of the proposed new school have not been determined, such as course offering, definite CTE pathway, and SED approval of its CTE program.
 - k. The SLT asks why the DOE is proposing to open an information technology school that is in walking distance to Information Technology High School.
 - l. The SLT asserts that LIC would welcome a new CTE program.
 - m. The SLT stated that the building Q452 has network and digital infrastructure issues, and asked if a physical survey was done to determine the building's readiness for an information technology school.
 - n. The SLT expresses concern that the building projects listed in the EIS are not accurately portrayed, and that the DOE is not amending the EIS because that would require a delayed PEP vote.

- o. The SLT states that there is widespread opposition to the proposal.
 - p. The SLT expressed concern that the Q452 building will continue to be overcrowded under this proposal, and ask how the building will manage the number of students in the building.
 - q. The SLT expresses concerns about the impact of this co-location proposal on LIC's continued success.
 - r. The SLT states that LIC's enrollment has decreased since 2007 because the school asked to reduce its enrollment, and that LIC was not included in the 2013-2014 High School Directory.
 - s. The SLT states that there is space for lease in the neighborhood for a new school.
 - t. The SLT expresses concern about the impact of another co-location on students attending P993@H450.
 - u. The SLT expresses concern about the history of interventions of LIC and their impact on students attending the school.
 - v. The SLT thanks the elected officials who have supported their position on this proposal.
70. CEC 30 submitted written comments concerning the proposed co-location:
- a. The comments assert that small schools are unable to offer challenging college preparatory coursework that LIC is able to offer due to its size.
 - b. The comments express support for LIC's extensive academic and extra-curricular offerings, including 26 AP classes.
 - c. The comments assert that LIC is one of the few high schools in the City that offers AP and upper-level Regents courses to a large Hispanic population.
 - d. The comments express concern that the DOE does not describe the impact of the proposal on the availability of LIC's classes.
 - e. The comments express concern that the DOE did not notify LIC's Spanish-speaking population of the proposal until October 8th.
 - f. The comments assert that elected officials have urged the DOE to postpone the PEP vote, yet the proposals remains on the PEP agenda for October 30th.
 - g. The comments express concern that LIC will continue to be overcrowded, and that classrooms will be used for administrative purposes.
 - h. The comments ask why the DOE is proposing to open an information technology program near Information Technology High School.
 - i. The comments assert that LIC can offer a new CTE program and that a new school is not needed, and that CEC 30 would collaborate to open this program at LIC.
 - j. The comments express concern that the DOE has failed to identify the programming of the proposed new school, and as such the community cannot evaluate the proposal and the DOE cannot assess space needed for the new school.
 - k. The comments express concern that the Q452 building does not have adequate physical requirements for an information technology school, and that the EIS does not address the cost of upgrading the building facilities.
 - l. The comments ask how the proposed new school's partner, Urban Assembly, was selected, and why this partner was not shared in the EIS.
 - m. The comments express concern that the EIS provides outdated information about LIC's performance.
 - n. The comments express concerns that the proposed CTE school is not approved by the SED, and as such students would not receive CTE-endorsed diplomas or VTEA funding. The comments further add that the EIS does not share the impact if the school's program does not receive SED approval.

- o. The comments state that the EIS does not address the fact that LIC would have difficulty continuing to fully prepare its student body for college and career readiness.
 - p. The comments inquire about the rationale for this proposal.
 - q. The comments state that the EIS lacks rational basis and is arbitrary and capricious due to the fact that no rationale is provided for the proposal, and that the impact on LIC's class and extra-curricular offerings is not defined in the EIS.
 - r. The comments express support for LIC and state that the school is on the rise.
 - s. The comments urge the PEP to reject this proposed co-location.
71. The Queens High School Presidents' Council submitted a letter requesting that the PEP vote against co-locations in Queens:
- a. The letter asserted that co-locations are being rushed and do not adequately engage communities.
 - b. The letter expressed support for construction of new schools with additional seats.
 - c. The letter expressed concern that the cost of additional administrative staff for a new school takes funding and classrooms away from students.
 - d. The letter expresses concern that small schools have a limited number of academic and extra-curricular offerings.
 - e. The letter encourages the DOE to assess the impact of co-locations on students.
72. Multiple commenters expressed concerns about LIC's zoned admissions and the ability of LIC to serve its zoned students.
73. The DOE received a letter from Ken Achiron representing the LIC SLT stating that no one spoke in favor of the proposal at the joint public hearing. He included the statement of Assemblywoman Catherine Nolan from the joint public hearing, a statement from the SLT reiterating their initial comments, as well as letters expressing opposition to the proposal, which stated the following:
- a. A letter from the Executive Director of St. John's University GEAR UP stated that the proposal would negatively impact the culture at LIC.
 - b. A letter from the Executive Director of St. John's University GEAR UP expressed support for LIC, stating that graduation rates have improved and that they provide college and career readiness programs for students.
 - c. A letter from the Executive Director of St. John's University GEAR UP expressed concern that their space in Q452 would be taken away.
 - d. A letter from the Executive Director of St. John's University GEAR UP stated that LIC can offer more CTE programs.
 - e. A letter from the Executive Director of St. John's University GEAR UP expressed concern about co-locations stating that there is a lack of shared mission, limited resources, and a culture of divisiveness in buildings with co-located schools.
 - f. A letter from the Pastor at the Community Church of Astoria expressed support for the LIC community.
 - g. A letter from the SLT reiterated their initial comments and stated that every speaker, including multiple elected officials, at the joint public hearing spoke in opposition to the proposed co-location.

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

- Comments 1(c,h), 3(a,f), 4c, 5(b,g), 7(a,c), 8(a,h), 9b, 10b, 13a, 15d, 16(c,d), 17c, 18(b,i), 21c, 22(a,b), 34, 51, 55u, 62c, 69(i,o,v), 70(f,p,s), 71e, and 73g express general opposition to this co-location proposal.

Co-location is the everyday experience of more than half the schools in New York City. Of all district schools, approximately two-thirds are co-located with another school, most with another district school.

Co-locations allow the DOE to use its limited facilities efficiently while simultaneously creating additional educational options for New York City families. This is necessary because the DOE has scarce resources and a demand for more options.

As mentioned in the EIS, the enrollment reduction of LIC is driven by LIC's performance and applicant demand for the school. LIC received an overall C grade on its Progress Report in 2011-2012 for the third consecutive year. Additionally, in 2011-2012, the school received F grades in both Student Performance and School Environment, and C grades in Student Progress and College and Career Readiness. Moreover, enrollment at LIC overall has decreased by 10% since 2007-2008, with a 34% decrease in ninth-grade enrollment from 1,000 ninth-grade students in 2007-2008 to 662 ninth-grade students in 2012-2013, indicating declining demand for the school. Applicant demand for LIC is low, particularly demand for the West Queens Center for Humanities Program to which students apply as part of the High School Admissions Process. For the 2012-2013 school year, there were 1.4 applicants per seat available in this program, as compared to the Citywide average of 8.6 applicants per seat in high schools, with only 9% of all applicants to the program ranking it as their first choice.

At this time, the DOE believes that reducing the enrollment of LIC beginning in September 2014 and providing a new option for high school students in the Q452 building will benefit current and future students at LIC and in Queens. The enrollment reduction is intended to provide an opportunity for LIC to concentrate on a smaller cohort of students, and allow for a new school option to develop in building Q452.

- Comments 18h, 56c, and 69(c,r) concern the reasons for why demand for LIC is low.

LIC was included in the High School Directory for 2013-2014 admissions. For the 2012-2013 school year, LIC was listed in the Addendum to the High School Directory, due to the fact that, in April 2012, the Panel for Educational Policy voted to implement the closure and replacement of LIC but a lawsuit prevented the DOE from following through with those plans. When the addendum was published, it was made available on line and in print, schools were alerted of the addendum, and it was sent home with students. In both school years, students applying for high school were able to indicate interest in LIC on their high school applications.

As explained in the EIS, applicant demand for LIC is low, particularly demand for the West Queens Center for Humanities Program to which students apply as part of the High School Admissions Process. For the 2013-2014 school year, there were 0.6 applicants per seat available in this program, with only 12% of all applicants to this program ranking it as their first choice. For the 2012-2013 school year, there were 1.4 applicants per seat available in this program, with only 9% of all applicants to the program ranking it as their first choice. For the 2011-2012 school year, there were 2.2 applicants per seat available in this program, with only 11% of all applicants to the program ranking it as their first choice. For the 2013-2014 school year, the Citywide average of applicants per seat in high schools is 8.1. In fact, the demand for the West Queens Center for Humanities Program has been significantly below the citywide average of applications per seat for several years prior to the 2011-2012 school year.

As mentioned in the EIS, the enrollment reduction of LIC is driven by LIC's performance and applicant demand for the school.

- Comments 3e, 8e, 9d, and 20b express concern about the timing of this proposal and the fact that it would be implemented under a new Mayor.

This proposal represents a continuation of DOE's strategy to increase access to high quality schools in communities that need better options for the 2014-2015 school year.

This timeline is not new. The PEP already approved 23 proposals for September 2014 implementation during the May and June PEP meetings.

The development of these 2014-2015 proposals reflects the DOE's extensive strategic planning to advance its proven strategy of bringing high quality schools online, as well as its desire to allow the maximum allotment of time for communities and educators to work towards their successful implementation.

Forward planning allots more time for:

- School/leaders to meet each other; and
 - OSP to plan school placement and implement any needed facilities upgrades; and
 - Charters to submit proposals for facilities matching; and
 - Division of Facilities to review and conduct work on approved proposals.
- Comments 9e, 17a, 55k, 69g, and 71a express concern about the DOE's engagement with the LIC community; comments 7b, 9c, 14b, 57, 60b, and 62b express concern that the DOE shared information about this proposal at the conclusion of the 2012-2013 school year; and comments 53, 54, and 67 ask how the DOE shares public comment with the PEP.

The DOE is committed to engaging with the community for all proposals to implement a significant change in school utilization. Chancellor's Regulation A-190 sets out the public review and comment process that the DOE undertakes with respect to all such proposals by the Chancellor (e.g., grade reconfigurations, re-sittings, co-location of schools, or phase-outs).

In May and June of 2013, several months prior to the issuance of the EIS describing this proposal, representatives from the Office of Portfolio Management spoke with LIC's Principal and Network Leader, the Community School District 30 and Queens High Schools Superintendents, and CEC 30 representatives about the potential proposed co-location of a new school in the Q452 building. At that time, the DOE advised CEC 30 that the LIC community will have additional time to learn more about the proposal and provide feedback after the start of the 2013-2014 school year. Additionally, the DOE indicated that it welcomes the opportunity for the SLT to convene over the summer to discuss the proposal, and/or after the LIC building re-opened at the end of the summer. The DOE discussed this proposal with the District 30 community at an August 15th CEC meeting.

Consistent with applicable laws and regulations, the EIS was published on the DOE's website on September 12th, 2013, and hard copies were made available in the main offices of LIC and P993@H450. Hard copies of the EIS were also sent to the impacted CEC, the impacted community boards, the community superintendent, the SLTs of the impacted schools, the Citywide Council on English Language Learners ("CCELL"), the Citywide Council on Special Education ("CCSE"), Citywide Council for High Schools ("CCHS") and the D75 Council. Parents were notified of the proposal and the joint public hearing via English and Spanish parent letters and joint public hearing notices that were backpacked home with students by September 20th. The DOE dedicated a proposal-specific website, voicemail and email address to collect feedback on this proposal.

In addition, the DOE reached out to CEC 30 and the impacted SLTs in advance of issuing the EIS to schedule the joint public hearing. The hearing was held approximately six weeks after the issuance of the EIS, consistent with applicable statutes and regulations.

The fact that approximately three hundred and fifty people attended the joint public hearing demonstrates that the community was well aware of the proposal and had a robust opportunity to provide public comment. All feedback received from the community via email, phone, or at the hearing is included in this document, which has been provided to the PEP and is publicly available on the DOE Web site.

Should the PEP approve this proposal, the DOE can continue to work with the community to ensure there will be further opportunities to learn about 30Q335 over this school year.

With regards to comments 53, 54, and 67, the transcript of the joint public hearing was posted on the dedicated proposal web site within 24 hours of the PEP meeting. Further, this public comment analysis will be posted on the DOE Web site and made available to the PEP the evening prior to the vote. In addition, there will be a public comment period at the PEP meeting prior to the votes, during which members of the public may provide further feedback about proposals.

- Comments 3d, 4a, 4b, 8f, 10a, 12d, 15a, 18f, 20a, 30, 36, 40, 55(c,d,o), 56b, 58c, 59c, 60c, 63, and 69p express concerns about the proposal's impact on overcrowding and safety in the Q452 building.

There are currently hundreds of schools in buildings across the City that are co-located. In all cases, allocation of classroom, resource, and administrative space is guided by the Citywide Instructional Footprint (the "Footprint") which is applied to all schools in the building.

The DOE seeks to fully utilize all its building capacity to serve students. In all cases, the DOE seeks to provide high quality education and allow parents/students to choose where to attend school.

The Footprint is the guide used to allocate space to all schools based on the number of class sections the school programs and the grade levels of the school. The number of class sections at each school is determined by the Principal based on enrollment, budget, and student needs; there is a standard guideline of target class size (i.e., number of students in a class section) for each grade level. At the middle school and high school levels, the Footprint assumes every classroom is programmed during every period of the school day except one lunch period. The full text of the Instructional Footprint is available at http://schools.nyc.gov/NR/rdonlyres/78D715EA-EC50-4AD1-82D1-1CAC544F5D30/0/DOEFOOTPRINTSConsolidatedVersion2011_FINAL.pdf.

As mentioned in the EIS, currently, building Q452 is overcrowded and does not have enough space pursuant to the Citywide Instructional Footprint (the "Footprint").

The proposal to co-locate 30Q335 in building Q452 will not substantially increase the number of students in the building at any given year above current practice, as LIC's enrollment will decrease as the new school phases into the building.

LIC currently manages its overcrowding by serving students on split-schedules. This means that the school operates a longer school-day than usual. For example, many high schools operate on a schedule that contains eight periods in the day. LIC, however, operates on a schedule that contains thirteen periods in the day. Students are typically in school for only eight periods, i.e. from first to eighth periods, from second to ninth periods, or from third to tenth periods. Split-scheduling enables the same number of classrooms to meet the instructional space needs of a larger number of students. Queens high schools

have successfully served students in buildings with a utilization in excess of 100% by efficiently scheduling classes through additional periods and split-schedules. If this proposal is approved, building Q452 may continue to program on split-schedules or in different ways than the standard assumptions to continue to accommodate approximately the same number of students as it currently serves.

Queens high schools, and many high schools throughout the city, have successfully served students in buildings with a utilization in excess of 100% by efficiently scheduling classes through additional periods and split-schedules. Some examples include Forest Hills High School and Francis Lewis High School in Queens, which each operate on more than one session and have received “A” and “B” progress report grades every year, with each receiving an “A” grade for the 2010-2011 and 2011-2012 school years.

If this co-location proposal is approved, although the building will continue to operate above 100% capacity and 30Q335, P993@H450, and LIC will be under Footprint (i.e. LIC’s actual allocation will be less than the school’s baseline Footprint allocation), the schools will be able to use all building resources to meet the needs of students throughout the period while LIC’s enrollment is reduced and 30Q335 phases in. In addition, during the course of the enrollment reduction, LIC will actually receive a greater proportion of its baseline allocation of space than it currently does.

Specific decisions regarding the allocation of the shared spaces will be made by the Building Council, consisting of principals from all co-located schools, in conjunction with the DOE’s Office of Space Planning. The proposal to co-locate 30Q335 in building Q452 is not anticipated to increase the number of students in the building at any given year above current practice, and thus common spaces in the building will continue to serve approximately the same number of students. The Office of Space Planning will also work with LIC to ensure a smooth transition, if necessary, of any rooms currently being used by LIC.

In regards to the concerns about safety, pursuant to Chancellor’s Regulation A-414, every school/campus is mandated to form a School Safety Committee, which is responsible for developing a comprehensive School Safety Plan that defines the normal operations of the site and what procedures are in place in the event of an emergency. The School Safety Plan is updated annually by the Committee to meet the changing security needs, changes in organization and building conditions and any other factors; these updates could also be made at any other time when it is necessary to address security concerns. The Committee will also address safety matters on an ongoing basis and make appropriate recommendations to the Principal(s) when it identifies the need for additional security measures.

In addition, the DOE makes available the following supports to schools around safety and security:

- Providing “Best Practices Standards for Creating and Sustaining a Safe and Supportive School,” as a resource guide;
- Reviewing and monitoring school occurrence data and crime data (in conjunction with the Criminal Justice Coordinator and the New York City Police Department);
- Providing technical assistance via the Borough Safety Directors when incidents occur;
- Providing professional development and support to Children’s First Network (CFN) Safety Liaisons;
- Providing professional development and kits for Building Response Teams; and
- Monitoring and certifying School Safety Plans annually.

The DOE is confident that the Principals in the Q452 building will continue to create a collaborative and mutually respectful environment for all students, staff, and faculty members.

- Comments 6, 14a, 17b, 21a, 42, 55f, 56e, 59e, 61, 64, 65, 66, 68a, 69h, and 70e express concerns about the translation of the EIS.

According to the language needs submitted by Long Island High School, approximately 40% of students speak Spanish while the remainder either speak English or another language spoken by less 4% of the student population. The EIS for this proposal was issued on September 12th and sent for translation directly thereafter. Given the length of the document and the translation quality control measures, this process took considerable effort. The EIS was amended on September 27th. The DOE posted the Spanish translation of the amended EIS on October 8th, more than two weeks in advance of the joint public hearing.

In addition, on September 20th, more than a month before the joint public hearing, a translated parent letter and hearing notice for the proposal were distributed to the school community. The parent letter summarizes the proposal and describes opportunities to provide feedback, including the October 23rd joint public hearing and dedicated phone and email venues for feedback. The hearing notice also includes a brief overview of the proposal and outlines opportunities for feedback including the October 23rd joint public hearing and dedicated phone and email venues for feedback. When the proposal was amended, the amended notice of joint public hearing was translated within one week.

Given the information provided above, the DOE communicated to CEC 30 that the joint public hearing would take place as scheduled on October 23rd, 2013, and the proposal would remain scheduled to be voted on during the October 30th, 2013 PEP meeting.

Additionally, Spanish, Bengali, and Arabic interpreters were available at the joint public hearing on October 23rd, 2013 to assist attendees in need of translation services.

The DOE believes that it has complied with all applicable regulations.

- Comments 2d, 3c, 4d, 5e, 12j, 13d, 16a, 19b, 28, 38, 41, 56a, 60a, 69(a,q), 70r, and 73b state that LIC's performance is improving; comments 13e, 18a, 69d, and 70m contend that the performance and enrollment data provided in the EIS are incorrect; and comments 5h, 12f, 14d, 23, and 44 ask that the DOE give LIC time and resources to improve.

The DOE acknowledges these comments and that there are ways in which LIC has improved and is serving certain student populations well. LIC will continue to serve approximately 1,935-1,975 students by the end of the enrollment reduction, and will continue to receive support and assistance from its superintendent and [Children First Network](#), a team that delivers operational and instructional support directly to schools.

As mentioned in the EIS, at this time, the DOE believes that reducing the enrollment of LIC beginning in September 2014 and providing a new option for high school students in the Q452 building will benefit current and future students at LIC and in Queens. The enrollment reduction is intended to provide an opportunity for LIC to concentrate on a smaller cohort of students, and allow for a new school option to develop in building Q452.

Information about funding for LIC is addressed in the response to comments 5f and 48b.

With regards to comments 13e, 18a, 69d, and 70m, the EIS includes 2013-2014 Budget Register Projections (as do all proposals published before October 31st), which are the most reliable indicator of expected enrollment. While school registers may differ from projections during the start of the school

year, the DOE notes that registers often fluctuate daily through October 31st, when the unaudited register becomes available.

With respect to comments about the EIS's inclusion of 2011-2012 progress report data, it should be noted that 2011-2012 progress report grades are the most up-to-date, publicly available information at this time.

- Comments 2e, 8b, 11, 12g, 18c, 22c, 58a, 59a, 69b, and 73f express support for LIC; and comments 1a, 2c, 5c, 12a, 13f, 15c, 18d, 24, 49, 55(a,m), 69e, and 70(b,c) express support for LIC's diverse programming.

The DOE commends the collaborative role that parents and principals partake in developing schools. In addition, schools throughout the city are not just educational institutions, but rich and tight-knit communities. The DOE expects that all schools will be fully engaged with the community and will continue to play a vital role as an anchor for the community.

Additionally, the DOE acknowledges the diverse offerings available at LIC and, as mentioned below, the school will continue to be a sufficient size to provide a wide array of academic and extra-curricular offerings for students. Decisions about elective course offerings rest with school administrators and will be based on student demand and available resources.

As stated in the EIS, LIC serves students classified as English Language Learners ("ELLs"). LIC offers English as a Second Language ("ESL") services and a Transitional Bilingual Program in Spanish. All students enrolled at LIC will continue to receive their mandated ELL services if this proposal is approved.

- Comments 1(b,g), 2a, 4e, 5d, 8g, 12b, 13b, 18g, 19c, 26, 27, 37, 55(b,r), 60d, 62a, 69f, and 70(d,o,q) express concern about the impact of this proposal on LIC's programming.

As mentioned in the EIS, as total enrollment at LIC declines throughout the course of the enrollment reduction, the school may need to scale back its elective course offerings. It is difficult to predict how those changes might be implemented, as decisions will rest with school administrators and will be based on student demand and available resources. However, the school will still have 1,935-1,975 students by the end of the enrollment reduction, and this is a sufficient size to continue offering a wide array of academic and extra-curricular offerings.

Additionally, the DOE does not anticipate that this proposal will affect the extra-curricular programs or partnerships currently offered at LIC. The school will still have 1,935-1,975 students by the end of the enrollment reduction, and this is a sufficient size to continue offering a wide array of extra-curricular offerings. LIC will continue offering student athletics and other extra-curricular programs options, but the number and range of programs offered may change due to declining student enrollment as a result of the enrollment reduction.

LIC will continue to offer extra-curricular programs based on student interests, available resources, and staff support for those programs. The proposed co-location will not impact those opportunities. Students will continue to have the opportunity to participate in a variety of extra-curricular programs, though the specific programs offered at a given school are always subject to change. That is true for any City student as all schools modify extra-curricular offerings annually based on student demand and available resources.

Additionally, with regards to comment 55r, given the demand for the Culinary Institute program at LIC, the proposed co-location is not expected to affect the CTE programming in building Q452. LIC's and Co-

Op Tech's CTE programs will continue to be offered to current and future students, with no anticipated changes to the programs or to enrollment as a result of this proposal.

- Comments 2f, 12e, 16b, 25, and 55l express concern that LIC's teachers may be excessed as a result of this proposal.

As mentioned in the EIS, as student enrollment at LIC declines, the school's staffing needs may be reduced. All excessing would be conducted in accordance with existing labor contracts. For example, the current UFT contract would require excessing to take place in reverse seniority order within each given teaching license area. Barring system-wide layoffs, excessed teachers would be eligible to apply for other City positions, and any teachers who did not find a permanent position would be placed in the Absent Teacher Reserve ("ATR") pool, meaning that they would continue to earn their salary while serving in the capacity of a substitute teacher in other City schools. Should there be a vacancy in the school in a teacher's license area within one year of the teacher being excessed, the teacher would have a right of return to the school, consistent with applicable contractual provisions regarding teachers' seniority.

30Q335 will need to hire teachers during each year of its phase-in as the total number of students enrolled in the school increases over each of the next four years. The precise number of positions needed for the 2014-2015 school year will be determined once annual enrollment projections are released in the Spring of 2014. Similarly, the number of new positions created to serve students in tenth through twelfth grade will be determined based on annual enrollment projections available as the school grows to serve those grades.

New administrative staff and non-pedagogical positions will be created at 30Q335 over the course of its phase-in. 30Q335 is expected to hire additional administrative and non-pedagogical staff as each new grade is added. New district schools follow the hiring process consistent with the procedures set forth in the collective bargaining agreement between the DOE and UFT.

- Comments 8d, 12(c,i), 15e, 33, 48c, 55e, 58b, 59b, 69t, and 73(a,e) express concerns about the impact of a co-location on the environment in the Q452 building.

Co-location is the everyday experience of more than half the schools in New York City. Of all district schools, approximately two-thirds are co-located with another school, most with another district school.

Co-locations allow the DOE to use its limited facilities efficiently while simultaneously creating additional educational options for New York City families. This is necessary because the DOE has scarce resources and a demand for more options.

Many school buildings successfully house co-located schools. Examples in Queens include the Springfield Gardens Campus which houses four high schools, three of which received "A" or "B" on their progress report grade for the 2011-2012 school year; the Jamaica High School Campus which houses two high schools that received an "A" on their 2011-2012 progress report and two high schools that are currently phasing in and do not yet have progress report grades; the Middle College Campus which houses two high schools that received an "A" and a "B" on their 2011-2012 progress reports; and Queens High School Complex, Q735 which houses three A-rated schools according to their 2011-2012 progress reports. Principals across the city have collaborated to meet the needs of all students served in their buildings.

In addition, there are several examples of school buildings in which co-located schools have collaborated to meet the needs of all students served in the building, such as:

- Building K023 currently houses Brooklyn Charter School, a charter elementary school serving students in grades K-5, and P.S. 23, a district elementary school. The Principals of both schools attended Principal Academy together and regularly collaborate on joint school events and extracurricular opportunities for students.
- Building M142 currently houses Manhattan Charter School, a charter elementary school which is growing to serve students in grades K-5 at full scale, and P.S. 142 Amalia Castro, a district elementary school serving students in grades K-5; there is also an Educational Alliance Head Start program served in the building, which offers Pre-Kindergarten services. During the 2009-2010 school year, Manhattan Charter and P.S. 142 Amalia Castro worked together to submit a joint grant application for funding for facilities improvements to benefit all students currently attending school in the M142 building.

The DOE has confidence in the abilities of LIC, P993@H40, and the new school to create strong cultures supportive of student progress and high quality performance. As mentioned above, many DOE schools are successfully co-located and Building Councils are established to allow school leaders to collaborate in sharing common space, facilitating administrative decision-making and ensuring that all schools in a building operate smoothly and safely. Furthermore, if the Building Council, which is comprised of the principals of the co-located schools, is unable to resolve an issue, it should engage in the dispute resolution process outlined in the Campus Policy Memo, which is available at <http://schools.nyc.gov/community/campusgov>.

- Comments 5i, 8c, 32, 48a, 52, 55h, 56f, 69l, 70i, and 73d propose that the DOE open a new CTE program at LIC instead of a new CTE school.

CTE schools differ from CTE programs in schools: Every student enrolled in the new school would partake in a CTE sequence; CTE programs in large high schools, such as the Culinary Arts program at LIC, are an option for students already enrolled in the school.

LIC continues to have the ability to work through the DOE's Office of Postsecondary Readiness if it is interested in offering new CTE programs, which must go through a DOE and state approval process. The DOE does not anticipate that the proposed new school would impact LIC's current CTE programming, or its ability to offer additional CTE programming.

This proposal provides a new, different, and smaller school option for students and families in Queens and across New York City, while allowing LIC to continue to offer a wide array of educational options for students. As described in the response to comments 1f, 35, 70a, and 71d, new small schools have demonstrated success. The DOE believes that the CTE program will be more successful within the structure of a small new school.

- Comments 1d, 3b, 9a, 12h, 19a, 29, 55i, and 69u concern the history and impact of prior interventions at LIC.

The central goal of the Children First reforms is simple: to create a system of great schools. Every child in New York City deserves the best possible education. This starts with a great school – led by a dedicated leader with a vision for student success.

LIC has struggled to meet performance targets for several years. In 2011, the DOE applied to the SED to place the school into the Transformation model, one of four federally approved intervention models. Based on later evidence that the school was not equipped to significantly improve student performance, in April 2012, the Panel for Educational Policy voted to implement the closure and replacement of LIC. A lawsuit prevented the DOE from following through with those plans.

The enrollment reduction of LIC is driven by LIC's performance and applicant demand for the school. LIC received an overall C grade on its Progress Report in 2011-2012 for the third consecutive year. Additionally, in 2011-2012, the school received F grades in both Student Performance and School Environment, and C grades in Student Progress and College and Career Readiness. Moreover, enrollment at LIC overall has decreased by 10% since 2007-2008, with a 34% decrease in ninth-grade enrollment from 1,000 ninth-grade students in 2007-2008 to 662 ninth-grade students in 2012-2013, indicating declining demand for the school. Applicant demand for LIC is low, particularly demand for the West Queens Center for Humanities Program to which students apply as part of the High School Admissions Process. For the 2012-2013 school year, there were 1.4 applicants per seat available in this program, as compared to the Citywide average of 8.6 applicants per seat in high schools, with only 9% of all applicants to the program ranking it as their first choice.

At this time, the DOE believes that reducing the enrollment of LIC beginning in September 2014 and providing a new option for high school students in the Q452 building will benefit current and future students at LIC and in Queens. The enrollment reduction is intended to provide an opportunity for LIC to concentrate on a smaller cohort of students, and allow for a new school option to develop in building Q452.

- Comments 1e, 2b, 31, 55s, 69j, 70j, and 70(n,l) concern the information provided in the EIS about 30Q335's programming; and comments 1f, 35, 70a, and 71d express concern about the ability of small schools to offer advanced courses.

As mentioned in the EIS, 30Q335 will likely offer CTE programming in Information Technology, with specific program focus on interactive design, networking, and software development. Students would complete their high school graduation requirements and earn industry-recognized credentials (such as Adobe certifications) as they prepare a portfolio of work and develop a senior capstone project that meets a real business or social need. If this proposal is approved, students who are interested in applying to 30Q335 will have the opportunity to submit an admissions application with new school rankings in March for Round Two of the High School Admissions Process. Other new high schools designated to open throughout the City for the 2014-2015 school year will also be available for students to consider.

The New York City High School Directory, which is available in print at DOE middle schools, Borough Enrollment Offices, or on the DOE's Web site at: <http://schools.nyc.gov/ChoicesEnrollment/High/Publications>, offers a full list of high schools Citywide.

Detailed information about new high schools is published annually in the new schools directory, available in print at a Borough Enrollment Office or on the DOE website: <http://schools.nyc.gov/ChoicesEnrollment/High/Publications>.

With regards to comment 70j, 30Q335 will serve approximately 420-460 students and, thus, according to the Instructional Footprint, which guides space allocation and use in City schools, has a baseline footprint allocation of 16 full-size instructional rooms, one of which is larger than 750 square feet, 1 half-size room, and 3.5

FSE rooms of administrative space when it is at full scale. The Q452 building has approximately 69 classrooms that are larger than 750 square feet.

With regards to comment 31 and 55s, the CTE program of the proposed new school is not yet approved by the SED. The DOE supports all CTE programs through the program approval process, which includes an initial self-assessment and formal self-evaluation followed by external review and submission to SED, which ultimately confers the approval. Regardless of program approval status, schools may have the capacity to teach toward and prepare students for an industry-certified exam.

With regards to comment 70n, the EIS notes that new district schools are provided with a fixed per-school allocation and a variable per-pupil allocation of funds to cover start-up other than personal services (“OTPS”) costs. Based on current one-time allocations for new schools, 30Q335 will receive a fixed allocation of \$80,000 and approximately \$49,875 - \$54,625 in new school OTPS start-up per-pupil allocations during its first year.

In addition, 30Q335’s basic operating budget will be allocated on a per pupil basis, based on current by the Fair Student Funding (“FSF”) per capita allocation levels. Schools receive additional funds for students with disabilities, English language Learners (ELLs), and those with other supplemental academic needs.

Additionally, as SED approval is necessary for VTEA funding eligibility, 30Q335 will have to receive SED approval for its CTE programs in order to apply for and receive VTEA funding following its fourth year of operation.

With regards to comments 1f, 35, 70a, and 71d, LIC will still serve 1,935-1,975 students by the end of the enrollment reduction, and this is a sufficient size to continue offering a wide array of academic offerings. Additionally, small schools under this administration have demonstrated success. It is evidenced in the data - graduation rates at new schools are higher than at the large high schools they replaced. Some examples:

- *Manhattan:* The new schools located on the Seward Park Campus in lower Manhattan had a graduation rate of 76.0% in 2012, compared to Seward Park High School’s graduation rate in 2002 of 36.4% (Seward Park HS completed its phase-out in 2006).
- *Manhattan:* The new schools located on the Park West Campus in Manhattan had a graduation rate of 73.6% in 2012, compared to Park West High School’s graduation rate in 2002 of 31.0% (Park West HS completed its phase-out in 2006).
- *Brooklyn:* In 2012, the schools on the Van Arsdale campus in Brooklyn had a graduation rate of 87.2%—more than 40 points higher than the former Harry Van Arsdale High School’s graduation rate of only 44.9% in 2002 (Van Arsdale HS completed its phase-out in 2007).
- *Brooklyn:* The Erasmus Hall High School graduated only 32.0% of student in 2002. The new schools on the Erasmus campus are getting tremendous results, graduating 74.6% of students in 2012. (Erasmus Hall HS complete its phase-out in 2006.)
- *Queens:* The new schools located on the Springfield Gardens Campus in Queens had a graduation rate of 70.0% in 2012, compared to Springfield Gardens High School’s graduation rate in 2002 of 41.3% (Springfield Gardens HS completed its phase-out in 2007).
- *Bronx:* The new schools located on the Evander Childs Campus in the Bronx had a graduation rate of 70.1% in 2012, compared to Evander Childs High School’s graduation rate in 2002 of 30.7% (Evander Childs HS completed its phase-out in 2008).

Further, a recently published report by MDRC found that the DOE's new, small schools, "which serve mostly disadvantaged students of color, continue to produce sustained positive effects, raising graduation rates by 9.5 percentage points. This increase translates to nearly 10 more graduates for every 100 entering ninth-grade student."

While there may be differences in the types of offerings at large, comprehensive high schools, which can provide a wide array of courses, and small high schools, which can provide more individualized attention, students can rank their school preferences through the high school admissions process, depending on a high school model that best suits their needs.

There is more work to do, but the recently released MDRC report shows that the DOE policies are effective and serving those who matter most: students.

- Comments 13c, 43, and 50 concern the admissions method of 30Q335 and whether it would serve the LIC community.

The proposed new high school would offer ninth grade in 2014-2015 and therefore would be open to all eighth-grade and interested first-time ninth-grade students. Students who are interested in applying to 30Q335 will have the opportunity to submit an admissions application with new school rankings in March for Round Two of the High School Admissions Process. The new school will admit students through a limited unscreened admissions method with priority for those that attend an information session, open house event, or high school fair, and a priority for Queens residents. All students in the community are welcome to apply for grades offered at 30Q335 as it phases in. Please refer to Chancellor's Regulation A-101 regarding transfer policies.

The DOE believes strongly in CTE education and providing new small school options for students and families. The DOE believes that this new school, which would focus on graphic design, computer systems networking, and computer science and media applications would provide the community with an additional and different choice.

- Comments 5a, 18e, 21b, 56g, 69k, and 70h concern the rationale for opening a CTE school with an information technology focus at Q452, when Information Technology High School is located nearby.

The DOE notes that Information Technology High School is located approximately 1.5 miles from the Q452 building. This school has four CTE programs in the Information Technology career cluster – Apple Academy, Cisco Academy, Film/Video Production, and Web Design Academy – which are not yet approved by the SED. The school's overall enrollment is approximately 900 students for the 2013-2014 school year.

Information Technology High School admits students through an educational option admissions method. Educational option programs are designed to attract a wide range of academic performers. Each program has a certain proportion of seats reserved for students with high, middle, and low reading levels. From the applicant pool, half of the students matched are selected from those ranked by the schools' administration and the other half is selected randomly. If a student scores in the top 2% on his or her previous year's English Language Arts reading exam and lists an educational option program as his or her first choice, he or she would be guaranteed a match to that program.

The school offers 200 seats for ninth-grade students, and received approximately 7.5 applicants per seat offered in the 2013-2014 school year. Moreover, approximately 36% of applicants to the program ranked the school in their top three choices, indicating demand for this type of programming. This data indicates that there is high demand for CTE schools with a technology focus. Additionally, technology is a fast growing industry in New York City, and the proposed new school would help position students to take advantage of opportunities in this sector.

The proposed new school, 30Q335, will likely offer CTE programming in the Information Technology career cluster and, as mentioned above, would admit students through a limited unscreened admissions method, with a priority for students residing in Queens. Limited unscreened schools give admissions priority to students who demonstrate interest in the school by attending an information session, open house event, or visiting the school's exhibit at any one of the High School Fairs.

As mentioned above, the DOE believes in the importance of CTE education and supports the opening of 30Q335 in the Q452 building. CTE programs position students to complete high school and advance to higher education and career-track employment at family-supporting wages in high-demand industries. CTE incorporates academic rigor, real-world relevance and workplace skills, through programs informed by industry stakeholders providing guidance on curriculum and technology and offering work-based learning opportunities that students build upon for success in college and career.

- Comments 55t, 68b, and 69n concern building projects for building Q452; and comments 55n, 56d, 69m, and 70k concern the ability of the infrastructure of building Q452 to support the siting of an information technology school.

With regards to comment 55t, the EIS was amended on September 27, 2013 to clarify the status of building projects listed in Section VII of the proposal. Specifically, the amended EIS notes that the Fire Alarm System project is in progress but not yet in construction, and the FY13 Reso A Technology project is in the purchase and install phase.

With regards to comments 56d, 69m, and 70k, the DOE notes that building Q452 has nine computer labs located on the third, fourth, and fifth floors of the building. Additionally, as the DOE is always looking to improve building facilities, the DOE will investigate any current network and digital infrastructure issues. The DOE will also ensure that the building will have sufficient information technology systems to support the proposed new school.

- Comments 55g, and 70g assert that the proposed new school would use much needed classrooms for administrative spaces.

As mentioned in the EIS, building Q452 has a total of 21.0 full-size equivalent (“FSE”) rooms of designed administrative/office space, 16.0 FSE of which are not currently allocated towards shared spaces. If this proposal is approved, when all schools are at full scale in 2017-2018, there is adequate administrative space for all school organizations in Q452: LIC’s baseline footprint includes 10.0 FSE of administrative space; P993@H450’s baseline footprint includes 1.5 FSE of administrative space, although they are currently not using administrative space; and 30Q335’s baseline footprint includes 3.5 FSE rooms of administrative space. While the assignment of rooms to specific schools is ultimately up to the Building Council, and schools can choose to use excess full-size, half-size, and quarter-size rooms for administrative purposes, there is adequate designed administrative space in building Q452 for the proposed new school 30Q335.

- Comments 5f and 48b concern funding for LIC; and comments 15b, 55j, and 71c concern the impact of this proposal on LIC's budget.

Fair Student Funding (FSF) dollars – approximately \$5.0 billion in the 2012-2013 school year based on projected registers – are used by all district schools to cover basic instructional needs and are allocated to each school based on the number and need-level of students enrolled at that school. All money allocated through FSF can be used at the principals' discretion, such as hiring staff, purchasing supplies and materials, or implementing instructional programs. As the total number of students enrolled changes, the overall budget will increase or decrease accordingly, allowing the school to meet the instructional needs of its student population. In addition to the FSF student-need based dollars a school receives, all schools receive a fixed lump sum of \$225,000 in FSF foundation and \$50,000 in Children First Network Support to cover administrative costs.

Principals have discretion over their budget and make choices about how to prioritize their resources to best align with their educational goals. Schools may choose to hire fewer administrative staff (e.g. forgoing or only having a single assistant principal) freeing up dollars to be directed toward other priorities.

As mentioned in the EIS, as a result of the enrollment reduction, the total number of students enrolled at LIC would decline each year, meaning that the school's budget would decrease each year, and the school would need fewer teachers and fewer supplies to meet the needs of its smaller student population. If the overall school enrollment grows again, the overall budget would increase accordingly. In any case, funding will be provided in accordance with enrollment levels, allowing the school to meet the instructional needs of its student population. This is how funding is awarded to all schools throughout the City, with budgets increasing or decreasing as enrollment fluctuates from year to year. Regardless of enrollment shifts, students will be able to take the necessary courses staffed with appropriately licensed teachers to satisfy their graduation requirements.

Please refer to the FSF Guide¹ and FY14 School Allocation Memoranda² for additional information on cost of instruction and how the changes to FSF funding and other school allocations will be impacted as a result of register changes at LIC.

Additionally, schools with CTE programs receive funds related to the Carl D. Perkins Vocational and Technical Education Act ("VTEA"). VTEA federal funds are used to improve career and technical education programs designed to prepare students to work in high-skill, high-wage, high-demand careers. Currently all programs, approved or not yet approved, are eligible for these funds. After June 2014, programs that serve grades nine through twelve must have earned SED approval to remain eligible for VTEA funding. As VTEA funds are funded on a per pupil basis, LIC might lose some of its additional funding to support the CTE program development if enrollment in the program declines.

- Comments 14c, 45, 58d, 59d, 69s, and 71b urge the DOE to lease a new site for the proposed new school.

As mentioned in the EIS, the opening and co-location of 30Q335 in building Q452 is intended to provide an additional option to students and families in District 30 and in Queens at large. As mentioned above, the DOE is planning to gradually decrease LIC's enrollment by approximately 420-460 students over a

¹ The FSF Guide is available at:

http://schools.nyc.gov/offices/d_chanc_oper/budget/dbor/allocationmemo/fy13_14/FY14_PDF/sam01_1c.pdf

² The FY14 School Allocation Memoranda are available at:

http://schools.nyc.gov/offices/d_chanc_oper/budget/dbor/allocationmemo/fy13_14/FY14_PDF/sam21.pdf

period of four years. The proposal to co-locate 30Q335 in building Q452 will not substantially increase the number of students in the building at any given year above current practice, as LIC's enrollment will decrease as the new school phases into the building.

There are no further available capital funds to construct additional school capacity in District 30 in the current FY 2010-2014 Five Year Capital Plan. However, the new FY2015-2019 Capital Plan will be released in early November. If a seat need were to be identified for Queens high schools, the School Construction Authority ("SCA") in conjunction with the DOE will be happy to evaluate potential sites.

- Comment 14e asks whether LIC will be able to use more space in building Q452 if its enrollment increases above projections.

As mentioned in the EIS, the Instructional Footprint guides space allocation and use in City schools: http://schools.nyc.gov/NR/ronlyres/78D715EA-EC50-4AD1-82D1-1CAC544F5D30/0/DOEFOOTPRINTSConsolidatedVersion2012_FINAL.pdf. Enrollment is one of several factors that determines the number of rooms a schools is allocated. More specifically, the Footprint allocates the number of baseline classrooms for student support services, resource rooms, and administrative space based on the grades a school serves and its enrollment at scale. Any space remaining beyond the baseline shall be allocated equitably among the co-located schools. In determining an equitable allocation, the DOE may consider factors such as the relative enrollments of the co-located schools, the instructional and programmatic needs of the co-located schools, and the physical location of the excess space within the building.

- With respect to comment 46, which indicates that some students did not remain for the duration of the joint public hearing, students who wished to speak were given the opportunity to speak before other public commenters. Additionally, it should be noted that all students (as well as any other interested parties) have had the opportunity to submit feedback via email or voicemail, or on the DOE Web site. All feedback will be taken into consideration prior to the PEP panel meeting. In addition, stakeholders may provide further comments at the PEP meeting.
- With respect to comment 47, which states that students trying to register for LIC are being denied admission to the school, as mentioned in the EIS, LIC has traditionally accepted students over-the-counter ("OTC") and continues to accept both zoned and non-zoned OTC students. Some students may receive a placement at 30Q335 through the OTC process, as well. OTC placement is a term that refers to the method of enrolling students who need a school assignment because they were not part of any admissions process for entry grades and/or were not enrolled in a NYC school at the time school started. Most of these students fall into one of four categories:
 - New to the New York City school system; or
 - Left the New York City school system and have returned; or
 - Are seeking transfers (based on the guidelines outlined in Chancellor's Regulation A-101); or
 - Students who did not participate in the High School Admissions Process for some other reason.

When a student arrives for an OTC placement, his/her school assignment is determined by his/her interest, home address, and which schools have available seats, and, where applicable, transfer guidelines. The student visits a Borough Enrollment Office where he/she meets with a counselor who reviews options that will meet the student's needs.

As of October 15th, LIC admitted approximately 75 students, or 17% of its new ninth-grade students, through the over-the-counter admissions process. Additionally, all students interested in LIC through the High School Admissions Process were given the opportunity to attend LIC.

- With regards to comment 55v, the proposed new school would partner with the Urban Assembly, which operates and supports a network of 21 high schools in New York City. The UA school network consistently achieves a graduation rate 10% or more above the city average, and nearly 20% above the city average for African American and Latino students, with over 75% of graduates enrolling in college. To learn more about The Urban Assembly, please visit their Web site at: <http://www.urbanassembly.org/>.
- With respect to comment 39, as stated in the EIS and re-iterated by facilitator Gregg Bethel during the joint public hearing, this proposal is for the co-location of a new district high school, and not for the phase-out of LIC or P993@H450.
- With respect to comment 72, on September 27th, the DOE issued an amended EIS to reflect the fact that the planned enrollment reduction will not impact the admissions methods or policies of any of the programs LIC currently offers, including the zoned program. As indicated in the original EIS, this proposal is not anticipated to impact LIC's ability to accommodate all of the zoned students who apply to LIC's zoned program.
- With respect to comment 55p, this is a proposal to open and co-locate a district high school, not a charter school, in building Q452.
- In regards to comment 73c, as stated in the EIS, GEAR UP is not expected to lose any space or reduce the services offered at LIC as a result of this proposal. It would continue to operate in the Q452 building subject to interest and demand.
- Comment 55q does not relate to the proposal and thus does not require a response.

Changes Made to the Proposal

No changes have been made to the proposal.