

Public Comment Analysis

Date: March 19, 2013

Topic: The Proposed Opening and Co-location of New District High School 30Q258 with I.S. 204 Oliver W. Holmes (30Q204) Beginning in 2013-2014

Date of Panel Vote: March 20, 2013

Summary of Proposal

The New York City Department of Education (“DOE”) is proposing to open and co-locate¹ 30Q258, a new district Career and Technical Education (“CTE”)² high school, in school building Q204 (“Q204”) located at 36-41 28 Street, Queens, NY 11106, within the geographical confines of Community School District 30 (“District 30”). The proposed new high school, 30Q258, will offer rigorous CTE programming in the Engineering and Robotics career cluster, as described in more detail below, which is designed to prepare students for post-secondary college and careers. If this proposal is approved, 30Q258 will be co-located in building Q204 with I.S. 204 Oliver W. Holmes (30Q204, “I.S. 204”), an existing district middle school serving students in grades six through eight. There are two community based organizations (“CBOs”), Beacon and City Year, also located in Q204.^{3,4}

The proposed co-location of 30Q258 in building Q204 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 Q204 building. Building Q204 currently houses I.S. 204 and Academy for Careers in Television and Film (30Q301, “ACTVF”), an existing CTE school that serves students in grades nine through twelve. In a separate Educational Impact Statement (“EIS”) also posted on February 1, 2013, the DOE is proposing to re-site ACTVF to new building Q404 beginning in the 2013-2014 school year. That proposal may be found here: <http://schools.nyc.gov/AboutUs/Leadership/PEP/publicnotice/2012-2013/Mar202013Proposals.htm>. If that proposal is not approved, the DOE would re-assess building options for 30Q258 and, if necessary, issue a separate EIS describing any alternate plan for the opening of 30Q258.

I.S. 204 is a zoned middle school serving students in sixth through eighth grades. I.S. 204 also enrolls students through the Magnet School for Living Green in a Global Society program, which admits students through the limited unscreened admissions method. Limited unscreened schools give admissions priority to students who demonstrate interest in the school by attending an information session, attending an open house event, or visiting the school's exhibit at any one of the Middle School Fairs.

¹ 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.

² CTE programs integrate rigorous academic study with workforce skills in specific career pathways. Students participate in programs that meet business and industry standards. 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.

³ More information about the Beacon program is available at: http://www.nyc.gov/html/dycd/html/afterschool/beacon_program.shtml.

⁴ More information about the City Year program is available at: http://www.cityyear.org/CityYear/Home_New_2011/Home_A_2011.aspx

30Q258 will be an early college/CTE school with a focus on careers in the energy industry. Through a six year program, students will complete their high school graduation requirements, enroll in classes at CUNY, have the opportunity to earn an Associate's degree, and engage in a progressive sequence of work-based learning experiences informed by and aligned to career pathways within National Grid and Con Edison. In years five and six of the program, as necessary, students will be taking classes off-site and completing internships and will not necessarily be in the Q204 building full-time.

If this proposal is approved, 30Q258 will open in September 2013 in building Q204, where it will be co-located with I.S. 204. 30Q258 will be open to students through the Citywide High School Admissions Process and will have a limited unscreened admissions method, with priority for students residing in Queens. In 2013-2014, 30Q258 will enroll approximately 105-115 students in the ninth grade. 30Q258 will gradually phase in by adding one grade per year. The school is expected to reach "full scale" in 2018-2019, when it will serve approximately 630-690 students in grades nine through twelve, including the students who are still enrolled for their fifth and sixth years.

Q204 has been identified as an under-utilized building.⁵ Q204 has the capacity to serve 1,584 students.⁶ During the 2012-2013 school year the building serves a total of 1,144 students,⁷ yielding a building utilization rate of 72%.⁸ If this proposal is approved, there will be sufficient space to accommodate I.S. 204 and 30Q258.

In 2018-2019, once 30Q258 has fully phased in, there will be approximately 1,350-1,440 students served in the building, yielding a building utilization rate of approximately 85%-91%. However, it is important to note that this range of 85%-91% represents the DOE's most conservative estimate of building utilization, and is in fact an over-estimation, as it includes 210-230 students in their fifth and sixth year of 30Q258's six-year Early College program, who will primarily complete their studies at off-site classes and through energy career development opportunities, and will only occasionally be in the Q204 building, but whose use of the building cannot be perfectly estimated at this time.⁹ Two additional classrooms will be allocated to 30Q258 for use by fifth- and sixth-year students on an as-needed basis, but the DOE does not believe that these students will increase the day-to-day building utilization rate from its current utilization as significantly as the 85%-91% range suggests.

The DOE strives to ensure that all students in New York City have access to a high-quality school at every stage of their education. The co-location of 30Q268 in building Q204 is intended to provide an additional option to students and families in District 30 and in Queens. Additionally, the DOE strongly believes in the importance of CTE education and supports the opening of a new high school in the Q204 building which will offer Engineering and Robotics CTE programming. The DOE has been eager to bring

⁵ The most recent Under-Utilized Space Memorandum and List was updated on November 20, 2012, and can be accessed at: http://schools.nyc.gov/NR/rdonlyres/6D8EA76A-82FA-4740-9ED1-66BCABEE8BFB/134525/UnderutilizedSpaceMemorandum112012_vFINALforprint.pdf.

⁶ 2011-2012 Enrollment Capacity Utilization Report ("Blue Book").

⁷ 2012-2013 Unaudited Register (as of October 26, 2012).

⁸ All references to building utilization rates in this document are based on target capacity data from the 2011-2012 Blue Book and enrollment data from the 2012-2013 Unaudited Register (as of October 26, 2012) or charter headcount as of October 1, 2012. This methodology is consistent with the manner in which the DOE conducts planning and calculates space allocations and funding for all schools. In determining the space allocation for co-located schools, the Office of Space Planning will conduct a detailed site survey and space analysis of the building to assess the amount of space available in the building.

⁹ This estimate is also conservative in that it presumes that all incoming ninth-graders will exercise their option to complete years five and six of the Early College program.

new CTE opportunities to Q204 to serve District 30 families; the co-location of 30Q258 will help meet this goal.

Summary of Comments Received

A joint public hearing regarding this proposal was held at building Q204 on March 14, 2013. Members of the School Leadership Team (“SLT”) from every school organization in the Q204 building as well as members of the District 30 Community Education Council (“CEC”) were invited to participate. At that hearing, interested parties had an opportunity to provide input on the proposal. While representatives from the Citywide Council for Special Education and Citywide Council for English Language Learners were invited, they did not choose to participate in the hearing. Approximately 70 members of the public attended the hearing and 17 people spoke. Present at the meeting were: Phil Composto, District 30 Superintendent; Edgar Rodriguez, Principal of ACTVF; Yvonne Leimsider, Principal of I.S. 204; District 30 CEC Members: Isaac Carmignani (CEC Co-President), Jeffrey Guyton (CEC Co-President), Valerie Lamour, Michelle Norris, and Ernie Brooks; I.S. 204 SLT Representative Fotina Lambos; ACTVF SLT Representative Simoa Santiago; Nick Gulotta from Congressman Jimmy Van Bramer’s office; and Allen Miller and Jillian Roland from the Division of Portfolio Planning.

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

1. CEC Co-President Isaac Carmignani expressed some support for the proposal but also expressed some concerns.
 - a. Representative Carmignani said there was not enough community input in the DOE’s generation of proposals.
 - b. Representative Carmignani said he was concerned about middle schools in District 30 (as they were very over-crowded). He asked that I.S. 204 accept more middle school students to alleviate middle school overcrowding in the rest of District 30.
 - c. Representative Carmignani stated that if you take all students who are turned away from I.S. 204 it is approximately 300 students. He said that I.S. 204 would be able to accommodate those students if the new CTE school were not co-located in Q204.
 - d. Representative Carmignani expressed that though not ideal, he supported to a certain extent the creation of the new CTE high school that is being proposed in the co-location proposal. He stated that there needed to be a greater emphasis on vocational training and the CTE focused school would provide that.
 - e. Representative Carmignani stated that a large amount of money had been spent making ACTVF’s current space in Q204 useable for instruction purposes. He questioned whether that money would now go to waste since ACTVF was resiting.
2. CEC Co-President Jeffrey Guyton expressed some support for the proposal but also expressed some concerns.
 - a. Representative Guyton expressed support for the proposals—he said that CTE preparation was critical in this day and age. He further stated that skills in engineering and energy would be critical and that the skills were really valuable. He also expressed support for the career preparation the school would provide students.
 - b. Representative Guyton requested a District 30 priority to the CTE program. He said that the school should be all but guaranteed to students in District 30 and then the rest of Queens should get second priority.

- c. Representative Guyton stated that there was not enough genuine community input in the creation of the proposal. He said that he saw no demand from the community for an engineering focused CTE program. Representative Guyton stated that there needed to be more community input.
 - d. Representative Guyton stated that the one thing he is happy about is that rezoning has increased the CEC's power and legislative authority.
3. CEC Member Valerie Lamour expressed opposition to the proposal.
 - a. Representative Lamour expressed frustration that the 2 different EISs for the resiting of ACTVF to Q404 and the co-location of a new CTE program in Q204 were both being discussed on the same night 1 week before the PEP. She stated that the timing and decision not to include the families of Hunters Point was disheartening. Representative Lamour further stated that this cemented her belief that 99% of DOE proposals are set in stone.
 - b. Representative Lamour stated that there was no community input in the process and that there could have been a better plan for the use of space in Q204 with the additional community input.
 - c. Representative Lamour stated that District 30 needed more middle schools. She doesn't understand why the DOE is constantly cramming schools into buildings instead of allowing the existing middle school to grow.
 - d. Representative Lamour said that the new CTE high school would have students aged 21 years old in close proximity to middle school students, which is problematic. She asked why the DOE couldn't find 2 classrooms somewhere else for the students in their fifth and sixth year of the program.
 - e. Representative Lamour expressed her belief that the PEP just votes according to what the Mayor asks. She encouraged people to write to the PEP. In addition, Representative Lamour further clarified the CEC's job was as an advisory panel and to advocate for the District 30 community. The PEP members are the ones who ultimately make the final decision.
 - f. Representative Lamour stated that building Q204 was built to be a middle school and not to house other schools.
 - g. Representative Lamour stated that the EIS is wrong because the proposal would in fact affect IS 204's admissions because they wouldn't be able to take as many students as they would like to.
 - h. Representative Lamour stated that programming at I.S. 204 is currently affected by co-location because of overcrowding in the building and the challenges of sharing public spaces.
4. CEC Member Michelle Norris expressed opposition to the proposal.
 - a. Representative Norris said she was very concerned with putting a 9-14 school in the same place as a middle school because she stated that children who are in the proximity of older people are more likely to engage in high-risk behavior. She stated that the age spread in Q204 would be too wide. She stated that 21 year olds, who are sexually active and can buy cigarettes and do drugs, would be in the same building as 10 year olds. The older students would be the gateway to high risk behavior for much younger children.
 - b. Representative Norris stated that the CTE students in their 5th and 6th years would have a lot of time off. She asked how it would be possible to fit all those people into 2 classrooms. There will be too many students and they will be there for much longer than brief periods of time.

- c. Representative Norris expressed her general enthusiasm for CTE education. She said the DOE should provide more CTE education.
 - d. Representative Norris proposed that the CTE students meet in a different building, essentially split siting the school.
 - e. Representative Norris asked for further detail regarding the total number of students who applied to I.S. 204 who were turned down due to limited space at the school and who are now in an overcrowded middle school building somewhere else in District 30.
 - f. Representative Norris stated that students with disabilities are in overcrowded buildings and learning in the hallways right now because there wasn't enough space in their middle school buildings. She urged the DOE to bring those students to I.S. 204.
5. CEC Member Ernie Brooks expressed opposition to the proposal.
- a. Representative Brooks stated that the proposed co-location was very concerning. He stated that I.S. 204 is a great school and that they should be able to grow and increase.
 - b. Representative Brooks stated that the older children in the CTE program placed in the same building as the younger middle school students was a concern.
6. I.S. 204 Principal Yvonne Leimsider expressed opposition to the proposal.
- a. Principal Leimsider expressed concern with the co-location. She said that I.S. 204 can only offer seats to 20% of their applicants because they have very little space.
 - b. Principal Leimsider further stated that I.S. 204 is already concerned about overcrowding and that this proposal would make the school more crowded.
7. I.S. 204 SLT Member Fotina Lambos expressed opposition to the proposal.
- a. Representative Lambos said more than an additional 600 students coming in to Q204 would be too many. There is already too much overcrowding.
 - b. Representative Lambos stated that scheduling events is already very hard. She further expressed that shared space is hard to work out and that there are already too many scheduling conflicts. Representative Lambos stated that I.S. 204 already doesn't have enough after school sports due to space constraints.
 - c. Representative Lambos stated that middle school students at I.S. 204 are as young as 10—they need a nurturing environment.
 - d. Representative Lambos said that I.S. 204 is already constricted and has to turn many away many prospective students as they take in only 15% of the applicant pool. Representative Lambos said that with more space I.S. 204 could grow and accept more of these students.
 - e. Representative Lambos expressed concerns about ACTVF's admissions process.
8. ACTVF Founding Principal Mark Dunetz expressed support for the proposal.
- a. Principal Dunetz said the studio space in Q204 used by ACTVF was very versatile—any school could use the space and that the space was unused when ACTVF first came in. He said he created instructional space in an overcrowded district when ACTVF came into Q204. He further suggested that the new CTE program could use that space now that ACTVF was leaving without a large investment in money.
 - b. He said that earlier claims regarding money being spent on renovations to their space were false and that not a single cent was wasted. Furthermore the renovated space could be used by any school.

- c. He said that co-locations are often challenging but that it is possible. He saw it as an opportunity for collaboration between schools. He stated that many of the concerns expressed during the hearing were the same concerns raised more than five years ago about bringing in a new CTE high school when ACTVF was proposed to co-locate with Q204.
 - d. He stated that the presence of high-school students in the building does not have any impact on teen pregnancy, violence, etc.,
 - e. He stated that there was not a single safety concern or issue with older students in ACTVF antagonizing the younger students at I.S. 204 in all 5 years of the co-location.
 - f. He stated that while there was no specific District 30 preference for ACTVF, as any student who comes to an open house get preference. All you have to do is show up for an open house. He stated that there was never any exclusion of I.S. 204 students—all those students from I.S. 204 who showed up to the open house were accepted into program.
9. Multiple commenters said that I.S. 204 should be completely geared towards middle school students and should be allowed to use the extra space to grow as a middle school.
 10. Multiple commenters stated that there were safety concerns with older high school and college students in the same building as younger middle school students.
 11. Multiple commenters stated that the co-location meant that I.S. 204 would have to share public spaces that are already overcrowded. These commenters stated that there was not enough space in the gymnasiums, library, cafeteria, etc.,
 12. Multiple commenters stated that while the co-location worked with ACTVF, the new CTE school should have their own space as it is very difficult to share space and there is not enough space in I.S. 204 for everyone.
 13. One commenter expressed that although co-locations are tough, middle school and high school students and their schools have to make it work. It is possible to get along together in the same building.
 14. One commenter said a CTE program in Queens would be a benefit to the neighborhood.
 15. One commenter stated that the Q204 space previously occupied by ACTVF would easily convert into good space for the new CTE school.
 16. One commenter asked what the benefit of co-location to I.S. 204 was.
 17. One commenter said that co-location undermines programs such as Positive Behavior Intervention Support (PBIS) because there is not enough public space. The space limitations are due to overcrowding.

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

18. CEC Member Valerie Lamour expressed opposition to the proposal.
 - a. Representative Lamour stated that I.S. 204 could expand now that ACTVF was resiting.
 - b. Representative Lamour stated that District 30 is currently experiencing overcrowding in its middle schools and that I.S. 204 could alleviate the overcrowding through its zoned and magnet programs.
 - c. Representative Lamour questioned the DOE's decision to place a high school in the building, stating that it would lead to overcrowding. She asked how 690 high school students from the CTE program would be able to fit in building Q204.
 - d. Representative Lamour stated that the Blue Book's capacity of approximately 1500 for Q204 was incorrect.

- e. Representative Lamour stated that having to share public spaces (such as the gym, auditorium, etc.) would affect I.S. 204's ability to provide programs, sports and other extracurricular activities.
- f. Representative Lamour stated that putting students as young as 10 in the same building as students as old as 21 would negatively impact the younger students.
- g. Representative Lamour stated that the CTE high school students deserved a space that would work for them in an underutilized building elsewhere.
- h. Representative Lamour expressed frustration that the DOE listed the new CTE program on the second round of high school applications despite the fact that the March 20th PEP vote had not occurred yet.

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

Comments 3(f), 3(h), 6(b), 7(a), 12, 18(c), and 18(g) concern space in building Q204 and whether both the new CTE school and I.S. 204 will have enough space.

There are currently hundreds of schools in buildings across the City that are co-located. In all cases, the 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/ronlyres/78D715EA-EC50-4AD1-82D1-1CAC544F5D30/0/DOEFOOTPRINTSConsolidatedVersion2011_FINAL.pdf.

During and after all schools in the building are fully phased in or have completed phasing out, each school will receive its baseline footprint allocation which indicates that there is enough room in the building to support all four schools. There will also be excess space in the building. The Office of Space Planning will work with the Building Council to ensure an equitable allocation of the excess space. In determining an equitable allocation, the Office of Space Planning 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.

Furthermore, the utilization of Q204 is currently 72%. During the first year of the proposed co-location of 30Q258, the utilization of the building will be between 53%-55%. In 2018-2019, once 30Q258 completes its phase-in and reaches full enrollment, the DOE projects the building will serve approximately 1,350-1,440 students, yielding a projected target utilization rate of 85%-91%. This projected utilization rate is based on the standard projections for the new CTE high school that would serve 630-690 students at full scale and on the current enrollment at other existing organizations in the building.

It is important to note that this range of 85%-91% represents the DOE's most conservative estimate of building utilization, and is in fact an over-estimation, as it includes 210-230 students in their fifth and sixth year of 30Q258's six-year Early College program, who will primarily complete their studies at off-site classes and through energy career development opportunities, and will only occasionally be in the Q204 building, but whose use of the building cannot be perfectly estimated at this time.

This estimate is also conservative in that it presumes that all incoming ninth-graders will exercise their option to complete years five and six of the Early College program.

This means that Q204 has adequate capacity to accommodate all of the schools in the building and that there will be sufficient space to accommodate an increase in student enrollment if demand is above the current projections for the new school.

Comment 18(d) concerns the accuracy of the blue book capacity for Q204.

Q204 has been identified as an under-utilized building.¹⁰ Q204 has the capacity to serve 1,584 students.¹¹ During the 2012-2013 school year the building serves a total of 1,144 students,¹² yielding a building utilization rate of 72%.¹³ As expressed above, if this proposal is approved, there will be sufficient space to accommodate I.S. 204 and 30Q258.

As described in more detail in the Enrollment, Capacity, Utilization Report ("Blue Book"), which is available at http://www.nycsca.org/Community/CapitalPlanManagementReportsData/Enrollment/2011-2012_Classic.pdf, a building's target utilization rate is calculated by dividing the aggregated enrollment of all school organizations in the building by the aggregated "target capacities" of those organizations. Each school organization's "target capacity" is calculated based upon the scheduled use of individual rooms as reported by principals during an annual facilities survey, the DOE's goals for maximum classroom capacities (which are lower than the UFT contractual class sizes and differ depending on grade level), and the efficiency with which classrooms are programmed (i.e., the frequency with which classes are scheduled in a given classroom).

The most recent year for which target capacity has been calculated for buildings is 2011-2012. As described earlier in this EIS, the DOE's projected utilization rates for the 2012-2013 school year and beyond are based on the 2011-2012 target capacity, which assumes that the components underlying that target capacity (scheduled use of classrooms, maximum classroom capacity, etc.) remain constant. Thus, projected utilization rates for 2012-2013 and beyond provide only an approximation of a building's usage because each of the factors underlying target capacity may be adjusted by principals from year to year to better accommodate students' needs. For example, changing the use of a room from an administrative room to a homeroom at the high school level will increase a building's overall target capacity because for high schools administrative rooms are not assigned a capacity. Holding enrollment constant, this change

¹⁰ The most recent Under-Utilized Space Memorandum and List was updated on November 20, 2012, and can be accessed at: http://schools.nyc.gov/NR/rdonlyres/6D8EA76A-82FA-4740-9ED1-66BCABEE8BFB/134525/UnderutilizedSpaceMemorandum112012_vFINALforprint.pdf.

¹¹ 2011-2012 Enrollment Capacity Utilization Report ("Blue Book").

¹² 2012-2013 Unaudited Register (as of October 26, 2012).

¹³ All references to building utilization rates in this document are based on target capacity data from the 2011-2012 Blue Book and enrollment data from the 2012-2013 Unaudited Register (as of October 26, 2012) or charter headcount as of October 1, 2012. This methodology is consistent with the manner in which the DOE conducts planning and calculates space allocations and funding for all schools. In determining the space allocation for co-located schools, the Office of Space Planning will conduct a detailed site survey and space analysis of the building to assess the amount of space available in the building.

will result in a lower utilization rate. Similarly, if a room previously used as a kindergarten classroom is subsequently used as a fifth grade classroom, the building's target capacity will increase because we expect that a fifth grade class will have more students than a kindergarten class. This is reflected in the fact that the DOE's goal for maximum classroom capacity is higher for fifth grade classrooms than for kindergarten classrooms. In this example, as well, assuming enrollment is constant, the utilization rate will decrease.

Comments 7(b), 11, 17, and 18(e) concern the use of shared spaces (cafeteria, gym, etc.) and how those spaces would be shared.

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 Office of Space Planning will also work with all schools in building Q204 to ensure a smooth transition, if necessary, of any rooms currently being used by I.S. 204.

The DOE does not anticipate that this proposal will affect the extracurricular programs or partnerships currently offered at I.S. 204.

If conflicts emerge and progress is impaired, the Building Council will follow the dispute resolution procedures outlined in the Campus Policy Memo available at the following link:
<http://schools.nyc.gov/community/campusgov/KeyDocuments/CampusMemo.htm>.

Comments 1(b), 3(c), 4(f), and 18(b) relate to overcrowding of middle schools in District 30.

The DOE recognizes that there is a need for additional middle school seats in District 30. As a result, the DOE is currently in the process of creating a separate proposal to increase middle school seat capacity through a district-wide rezoning beginning in the 2014-2015 school year.

The DOE also recognizes a need for additional high school seats in Queens. For the 2012-2013 school year, 18,260 ninth-grade seats were available in Queens. A total of 18,513 new ninth-grade students are enrolled in Queens high schools in 2012-2013, leaving a deficit of 253 seats. This co-location proposal is intended to provide additional options to current and future students in Queens without increasing the deficit of high school seats in Queens. Thus, the DOE intends to preserve the number of high school seats offered to the District 30 community and to students in Queens by providing an additional high school option in the district.

Comments 1(c), 3(g), 4(e), 5(a), 6(a), 7(d), 9, and 18(a) question whether I.S. 204 can expand when the new CTE school begins to phase in to Q204.

After each school has received its baseline footprint allocation, in 2018-2019, there will be 13 excess full-size rooms. Any excess space above the Footprint will be divided equitably among the schools as decided by the Building Council in conjunction with the DOE Office of Space Planning. This means that Q204 has adequate capacity to accommodate the new high school, and that there will be sufficient space to accommodate an increase in student enrollment if demand is above projections for either school.

Comment 2(b) requests that the new CTE high school give students in District 30 first priority to the new high school.

The DOE strives to ensure that all students in New York City have access to a high-quality school at every stage of their education. The co-location of 30Q258 in building Q204 is intended to provide an additional option to students and families throughout Queens. Additionally, the DOE strongly believes in the importance of CTE education and supports the opening of a new high school in the Q204 building which will offer Engineering and Robotics CTE programming to residents throughout the borough of Queens. The DOE has been eager to bring new CTE opportunities to Q204 to serve families throughout Queens; the co-location of 30Q258 will help meet this goal.

Comments 3(d), 4(a), 4(d), 5(b), 7(c), 10, and 18(f) suggest that having middle school students in the same building as high school and college-aged students would lead to safety concerns as well as increased high-risk behavior by the middle school students.

Due to space limitations, it is not unusual for varying grade levels to be co-located in a building together. There are successful examples of mixed grade co-located school buildings or campuses in New York City.

These examples include:

- The Julia Richman Educational Complex, which houses four small high schools, a K-8 school, and a District 75 program;
- Building M113 currently houses three schools: STEM Institute of Manhattan, a district elementary school, Harlem Success Academy 4, a charter elementary school, and Opportunity Charter School, which serves sixth through twelfth grade in District 3;
- Building M092 currently houses three schools: St. Hope Leadership Academy Charter School, a charter middle school serving students in grades fifth through eighth, P.S. 92, a district elementary school which serves students in grades K-5, and Democracy Prep Charter School, a charter high school serving students in grades nine through twelve.
- Building K324 currently houses three schools: M.S. 267, an existing middle school serving students in grades sixth through eighth, La Cima Charter school, a charter elementary school serving students in grades K-5, and Bedford Stuyvesant Collegiate, an existing charter secondary school, which is currently in the process of growing to serve students in grades 5-12. Members of the building council worked together to secure financing from KaBOOM to resurface the schoolyard and playground for all of the children at K324.

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.

The DOE makes available the following supports to schools around safety and security:

- Best Practice 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 NYPD)
- Technical assistance when incidents occur via the Borough Safety Directors
- Professional development and support to CFN Safety Liaisons
- Professional development and kits for Building Response Teams, and
- Monitoring and certifying School Safety Plans annually.

Additionally, it is important to note that the range of 85%-91% utilization represents the DOE's most conservative estimate of building utilization, and is in fact an over-estimation, as it includes 210-230 students in their fifth and sixth year of 30Q258's six-year Early College program, who will primarily complete their studies at off-site classes and through energy career development opportunities, and will only occasionally be in the Q204 building, but whose use of the building cannot be perfectly estimated at this time.

This estimate is also conservative in that it presumes that all incoming ninth-graders will exercise their option to complete years five and six of the Early College program.

Comment 7(e) questions the admissions process at ACTVF.

ACTVF admits students through the Citywide High School Admissions Process, described in further detail below. ACTVF's admissions policies would not be impacted by this proposal.

ACTVF admits students through a limited unscreened admissions method. Limited unscreened programs give priority to students who demonstrate interest in the school by attending a School information session or open house event, or by visiting the schools exhibit at any one of the High School Fairs.

In New York City, high school admission is based on a Citywide choice process, with students ranking up to 12 high school programs in order of preference. In addition to the 12 available programs to which students may apply, they may also apply to up to 8 of the Specialized High Schools requiring the SHSAT, as well as up to 6 studios at LaGuardia High School.

Beginning with high school admission for September 2013, there are two rounds in the High School Admissions Process:

Round One: All eighth-grade and interested first-time ninth-grade students participate in this round. All students, including applicants to the Specialized High Schools, will receive match results in March 2013.

Round Two: All eighth-grade and first-time ninth-grade students are eligible to apply to schools in Round Two. Any student who does not receive a match in Round One must apply to the available school programs in Round Two to be matched to a choice made on the application. In addition, any student who received a match in Round One may reapply to available programs in Round Two. A student who participates in Round Two and has already received a Round One match will have his or her Round One match nullified if the student receives a match in Round Two. The available programs for Round Two include school programs with remaining seats and new schools that will open the following September. Students will receive Round Two results at the end of May 2013.

For more information about the High School Admissions Process, please visit:
<http://schools.nyc.gov/ChoicesEnrollment/High/Publications/default.htm>.

High school students with IEPs, with the exception of those students recommended for a D75 placement, are admitted in the same manner as general education students. Schools will create programs that meet the needs of all students, ensuring students with IEPs access to learn alongside their non-disabled peers to the greatest extent possible.

Similarly, ELL students are admitted to high schools in the same manner as their non-ELL peers. Any students requiring ELL services will continue to receive appropriate services in accordance with DOE policy.

Comment 4(b) questions the fact that the new CTE program will only require 2 full size rooms as stated in the EIS when there will be many more students in the 5th and 6th year of the program than the space two rooms will allow for.

In 2018-2019, once 30Q258 completes its phase-in and reaches full enrollment, the DOE projects the building will serve approximately 1,350-1,440 students, yielding a projected target utilization rate of 85%-91%. This projected utilization rate is based on the standard projections for the new CTE high school that would serve 630-690 students at full scale and on the current enrollment at other existing organizations in the building.

It is important to note that this range of 85%-91% represents the DOE's most conservative estimate of building utilization, and is in fact an over-estimation, as it includes 210-230 students in their fifth and sixth year of 30Q258's six-year Early College program, who will primarily complete their studies at off-site classes and through energy career development opportunities, and will only occasionally be in the Q204 building, but whose use of the building cannot be perfectly estimated at this time.

This estimate is also conservative in that it presumes that all incoming ninth-graders will exercise their option to complete years five and six of the Early College program.

Comment 16 voices general opposition to the proposed co-location.

Roughly half of our schools share space in a building. Co-locations allow us to use our limited facilities efficiently while simultaneously creating additional educational options for New York City families. This is necessary because we have scarce resources and a demand for more options.

There may be commenters who suggest that co-locations pit schools against one another, but there are examples of school buildings in which different school principals have collaborated together to meet the needs of all students served in the building:

- 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.

Comment 1(a), 2(c), and 3(b) concern community input on the proposal.

The DOE appreciates all feedback from the community regarding a proposal. When the Educational Impact Statement was issued, it was made available to the staff, faculty and parents at I.S. 204 and ACTVF, on the DOE's Web site, and in each school's respective main office. In addition, the DOE dedicates a proposal-specific website and voicemail to collect feedback on this proposal. Furthermore, all schools' staff, faculty and parent communities were invited to the Joint Public Hearing to provide further feedback.

In addition, the relevant options for providing feedback are listed below. Commentary received through these venues as well as at the joint public hearing is addressed in this analysis of public comment which is made available to the Panel in advance of its vote.

Email: D30Proposals@schools.nyc.gov

Phone: 212-374-7621

Website: <http://schools.nyc.gov/community/planning/changes/queens/feedback?id=394>

Additionally, there is an opportunity for members of the public to provide comments at the March 20 PEP meeting at which this proposal will be considered. That meeting is scheduled to take place on Monday March 20, 2013 at 6:00 PM. The meeting will take place at Brooklyn Technical High School, located at 29 Fort Greene Place, Brooklyn, NY 11217.

Comment 3(a) suggests that the decision to have only one hearing for 2 different proposals on the same day and just a week before the PEP vote was unfair to the families of Hunters Point.

The DOE works continually with school communities—SLTs, Principals, parents—and CECs to select the best possible hearing date for that community. In some instances, newly emerging priorities or concerns may prompt any of the impacted parties to request a rescheduled hearing date. To the extent possible, the DOE aims to accommodate reasonable requests for rescheduling options within the appointed hearing window as far in advance as possible.

In the case of the combined joint public hearing to review both the proposal to resite ACTVF and the proposal to co-locate the new district CTE high school in Q204, the DOE strove to avoid the inconvenience of requiring families in the community to come out to two hearings at two different locations during the same time frame. As such, the DOE approached the CEC with the option of holding just one meeting at Q204. This was posed as an option that the Co-Presidents of the CEC, as representatives of the CEC, accepted. Once the hearing was scheduled, notice of the combined hearing was posted on the DOE's website and distributed accordingly:

- Paper copies of the combined hearing notice with the date were backpacked home with students, shared with the SLT and made available in the main office of both ACTVF and I.S. 204.

- Paper copies of a combined hearing notice with the date were mailed to the School Leadership Team, CEC, and all Queens Community Boards.
- The Office of Public Affairs emailed notice of the combined hearing date to relevant elected officials.

Persons who were unable to attend a joint public hearing for any reason are welcome to submit comments and concerns via phone, email, or dedicated website. The PEP vote on a proposal also provides an additional opportunity for interested parties to provide direct and in-person feedback regarding a proposal.

Comment 18(h) expresses concern that the new CTE high school is listed on the second round of high school applications even though the PEP has not yet voted on the proposal.

As discussed in the EIS, the DOE is aware that the proposal to co-locate a new district CTE high school (“30Q258”) in Q204 will not be voted upon by the PEP until after the deadline to submit high school applications for the 2013-2014 school year has passed. Queens and District 30 students will not be penalized by the outcome of this proposal. New schools, including 30Q258, will be available for eligible students who choose to submit a Round 2 application.

In Round 2 of the high school admissions process, students who did not receive a match, and those students who are dissatisfied with their match may submit a new application and apply to 1) new schools, 2) new programs at existing schools and 3) programs with available seats.

In order to give families the broadest possible pool of choices in Round 2, the DOE included many schools that have been proposed but not yet approved by the PEP, including proposed new school 30Q258. However, we clearly indicate that the schools have not yet been approved in the Directory of New Schools and New Programs that is issued to students who will be participating in Round 2. Should the proposal not be approved, students would be notified of such, and be allowed to adjust their choices, or have any choices made to a school not opening omitted from their application, and remaining choices move up in preference order.

Comment 1(e) questions whether the money used to make ACTVF’s space instructional would go to waste if the school were to resite to Q404.

The money used to renovate space in Q204 to make it suitable for instructional purposes was a worthwhile investment as the space can now be used by any future school coming into the Q204 building.

Comments 1(d), 2(a), 4(c), 8(a-f), 13, 14, and 15 are in support of the proposal and thus do not require a response.

Comments 2(d) and 3(e) are not directly related to the proposal and thus do not require a response.

Changes Made to the Proposal

No changes have been made to the proposal.