

## **Public Comment Analysis**<sup>1</sup>

**Date:** September 30, 2013 and October 9, 2013

**Topic:** The Proposed Re-siting and Co-location of Stephen T. Mather Building Arts & Craftsmanship High School (02M139) in Building M625 with Existing Schools High School of Graphic Communication Arts (02M625), Business of Sports School (02M393), Urban Assembly Gateway School for Technology (02M507) and Success Academy Charter School – Hell’s Kitchen (84M170), and New School Success Academy Charter School – Manhattan Middle School (84MTBD) Beginning in the 2014-2015 School Year<sup>2</sup>

**Date of Panel Vote:** October 15, 2013

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### **Summary of Proposal**

The New York City Department of Education (“DOE”) is proposing to re-site Stephen T. Mather Building Arts & Craftsmanship High School (02M139, “Mather”) to school building M625 (“M625”) beginning in the 2014-2015 school year. M625 is located at 439 West 49<sup>th</sup> Street, New York, NY 10019 within the geographical confines of Community School District 2 (“District 2”). Currently, Mather is housed in building M520 (“M520”), located at 411 Pearl Street, Manhattan, New York 10038, also within the geographical confines of District 2. A “re-siting” means students will attend classes in a different building than the one they attended the previous year. If this proposal is approved, beginning in the 2014-2015 school year, Mather students will no longer attend classes in M520. Instead, they will attend classes in M625, where Mather will be co-located with five other schools: High School of Graphic Communication Arts (02M625, “Graphics”), an existing high school that currently serves students in grades ten through twelve; Business of Sports School (02M393, “BOSS”) an existing high school that serves students in grades nine through twelve; Urban Assembly Gateway School for Technology (02M507, “Gateway”), an existing high school that serves students in grades nine through eleven and is phasing in to serve students in grades nine through twelve; and Success Academy Charter School – Hell’s Kitchen (84M170, “SA – Hell’s Kitchen”), an existing elementary charter school which is in the process of phasing in to serve students in grades kindergarten through four and which will serve students in kindergarten and first grade in the 2013-2014 school year. Graphics is in

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<sup>1</sup> The DOE will continue to accept comments concerning this proposal up to 24 hours prior to the Panel for Educational Policy’s (“PEP”) vote on October 15, 2013. Any additional comments will be addressed in an amended Public Comment Analysis which will be made available to the PEP before it votes on this proposal.

<sup>2</sup> In addition to the proposal to re-site Mather, attendees at the September 30<sup>th</sup> and October 9<sup>th</sup> hearings also had an opportunity to provide comments on a related proposal to re-site the Urban Assembly School for Emergency Management to building M520. Responses to those comments may be found here: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2013-2014/Oct15PublicComment.htm>. Attendees at the October 9<sup>th</sup> hearing had an opportunity to provide comments on another proposal to co-locate Success Academy Charter School – New York 1 in building M520. Responses to those comments may be found here: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2013-2014/Oct15PublicComment.htm>.

the process of phasing out and will close at the end of the 2015-2016 school year. In addition, Success Academy Charter School – Manhattan Middle School (“SA - Manhattan MS”) will open in building M625 beginning in the 2015-2016 school year and will phase in to serve students in grades five through eight. A “co-location” means that two or more school organizations are located in the same building and may share common spaces like auditoriums, gymnasiums, libraries, and cafeterias.

On March 11, 2013, the Panel for Educational Policy (“PEP”) approved a proposal to site and co-locate Mather in M520 with Murry Bergtraum High School for Business Careers (02M520, “Bergtraum”) beginning in the 2013-2014 school year. On March 11, 2013, the PEP also approved a proposal to site and co-locate The Urban Assembly School for Emergency Management (02M135, “UA-EM”) in M625 beginning in the 2013-2014 school year. As a result of facilities assessments that occurred after the PEP approved Mather’s siting in M520, the United States National Park Service (“NPS”), Mather’s industry partner, and the DOE determined that M520 is an inappropriate site for Mather because the building cannot accommodate the lab space that Mather’s specialized curriculum requires. Building M625, on the other hand, is able to offer Mather the required lab space. This determination came too late in the year to propose the re-siting of Mather for the 2013-2014 school year. The DOE is therefore proposing to re-site Mather to M625 and UA-EM to M520 for the 2014-2015 school year. UA – EM will receive its required standard lab space in M520. Re-siting UA-EM to M520 and re-siting Mather to M625 will ensure that both schools are located in facilities that can support their respective instructional needs.

If both this proposal and the related proposal to re-site UA – EM are approved, in the 2014-2015 school year, Mather and UA – EM will effectively swap spaces in their respective buildings. NPS has worked with Mather to modify the school’s curriculum for the 2013-2014 school year in M520 to place more emphasis on coursework that does not require lab space.

Mather is a district high school currently sited in building M520. The school will offer a rigorous academic program with a Career and Technical Education (“CTE”) component that will prepare students for post-secondary education. CTE programs integrate rigorous academic study with workforce skills in specific career clusters. 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. Mather admits students through the Citywide High School Admissions Process.

If this proposal is approved, Mather will move to M625 prior to the beginning of the 2014-2015 school year, when it will serve approximately 210-230 students in the ninth and tenth grades. Mather will gradually phase in by adding one grade per year. The school is expected to reach full scale in 2016-2017, when it will serve approximately 420-460 students in grades nine through twelve. If approved, this proposed re-siting will require students enrolled at Mather in the 2013-2014 school year to travel a potentially farther distance to a different school building in the 2014-2015 school year as M520 and M625 are located 4.3 miles apart. However, the DOE believes that the re-siting will not create significant travel hardships, since both buildings are located

close to central public transportation hubs.

UA-EM is a district high school currently sited in building M625. UA-EM will serve ninth grade students beginning in September 2013 and will also offer CTE programming. UA-EM admits students through the Citywide High School Admissions Process and will serve students in grade nine during the 2013-2014 school year in M625. If the related proposal to re-site UA-EM is approved, UA-EM will be re-sited to M520 prior to the start of the 2014-2015 school year and will continue to add one grade level per year until it reaches full scale and serves students in grades nine through twelve in the 2016-2017 school year.

If the proposal to re-site UA – EM to M520 is not approved, the DOE will propose an alternate site for UA-EM, and will implement the re-siting of Mather from M520 to M625 subject to approval by the PEP.

M625 also houses two community-based organizations (“CBOs”), SPARK Drug Prevention and the Association of Progressive Dominicans. This proposal is not expected to impact the continued siting of the CBOs.

According to the 2011-2012 Enrollment, Capacity, Utilization Report (“Blue Book”), M625 has a target capacity to serve 2,247 students. During the 2013-2014 school year the building is expected to serve approximately 1,774 students, yielding a building utilization rate of 79%. This means that the building is “under-utilized” and has space to accommodate additional students.

In 2021-2022, once Graphics has completed its phase-out and Mather, Gateway, SA – Hell’s Kitchen and SA - Manhattan MS have reached full scale and stable enrollment, it is projected that there will be approximately 2,108 - 2,426 students served in M625, yielding an estimated utilization rate of 94% - 108%.

As described below and in the attached BUP, M625 has adequate capacity to accommodate Graphics, BOSS, Gateway, SA – Hell’s Kitchen, SA – Manhattan MS and Mather.

### **Summary of Comments Received**

A joint public hearing regarding this proposal was held at building M625 on September 30, 2013. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 11 members of the public attended the hearing, and 2 people spoke. Present at the meeting were Rudy Elizondo, principal of the Urban Assembly High School for Emergency Management and member of the school’s SLT; Larry Gabbard, principal of the Stephen T. Mather Building Arts & Craftsmanship High School and member of the school’s SLT; Marisol Bradbury, Community District 2 High School Superintendent; Elzora Cleveland, member of Community Education Council 2 (“CEC 2”); and Paola DeKock, president of the Citywide Council of High Schools.

A second joint public hearing regarding this proposal was held at building M520 on October 9, 2013. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 75 members of the public attended the hearing, and 28 people spoke. Present at the meeting were Rudy Elizondo, principal of the Urban Assembly High School for Emergency Management and member of the school's SLT; Larry Gabbard, principal of the Stephen T. Mather Building Arts & Craftsmanship High School and member of the school's SLT; Lottie Almonte, principal of Murry Bergtraum High School for Business Careers and member of the school's SLT; Valerie Roman, member of Bergtraum's SLT; Marisol Bradbury, Community District 2 High School Superintendent; Shino Tanikawa, president of CEC 2; and Sonni Mun, member of CEC 2.

Below is a summary of the comments received:

1. Paola deKock, president of CCHS, made the following comments:
  - a. She asserted that it should have been readily apparent that the M520 building lacked adequate woodshops to support Mather's instructional needs.
  - b. She asserted the DOE blames the National Park Service for the placement of Mather in a building with inadequate facilities.
  - c. She noted differences in the way Mather's program is described in the current EIS versus the EIS approved by the Panel.
  - d. She noted that Ellis Island is closed for the foreseeable future and questions the availability of adequate sites for student fieldwork.
  - e. She asserted that CCHS is not opposed to the proposals to re-site Mather to M625 and to re-site UA-EM to M520.
2. Elzora Cleveland, member of CEC 2, made the following comments:
  - a. Ms. Cleveland expressed concern about the planning process for Mather and concern for the uprooting of students.
  - b. She asserted that CEC 2 supports the proposals to re-site Mather to M625 and to re-site UA-EM to Bergtraum.
3. Shino Tanikawa, president of CEC 2, noted that Paola deKock had expressed concern about the adequacy of lab the space at Bergtraum for Mather's instructional needs at another joint public hearing in the spring.
4. Council Member Margaret Chin expressed concerns about the planning process that led to Mather's siting in Bergtraum and noted that she supports the proposals to re-site Mather to M520 and to re-site UA-EM to Bergtraum.
5. One speaker made the following comments:
  - a. She expressed concern about the change in location for UA-EM after students have already gotten settled in at M625.
  - b. She expressed concern about lengthening the commute for students at UA-EM by moving the school downtown.
  - c. She expressed concern about safety at the M520 campus.
  - d. She expressed concern that Bergtraum will close and that could cause further disruption to UA-EM, potentially causing it to move again.

6. Naomi Kroll, a partnership coordinator with the National Park Service, expressed her support for the proposal to re-site Mather to the M520 building.

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

7. A parent at Mather asked if this proposed re-siting is a positive move.

**The DOE received a comment which do not directly relate to the proposal. Those comments are summarized below.**

8. One commenter questioned the DOE's policy of phasing out under-performing schools and replacing those schools with multiple, smaller schools.

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

Comments 1(a), 2(a), 3 and 4 express concerns about the planning process that allowed Mather to be sited in a building that could not meet its instructional needs. The DOE was aware of Mather's need for CTE lab space prior to proposing M520 as a site for the school, and the DOE assessed building M520 prior to proposing the co-location of Mather in that building. However, only after the Panel for Educational Policy approved the co-location of Mather in M520 did the DOE become aware that issues with drainage and ventilation in the rooms intended for use as Mather's CTE labs would render those spaces inadequate for the specific lab needs of Mather's specialized curriculum. The DOE will continue to make every effort to ensure that new CTE high schools are placed in buildings that accommodate the lab needs unique to each school's specialized curriculum.

Comment 1(b) asserts that the DOE blames the National Park Service for Mather's placement in a building with inadequate facilities. Ultimately, the DOE is responsible for ensuring that schools have facilities that meet their instructional needs.

Comment 1(c) notes differences in the way Mather's program is described in different EISs. In the EIS initially published on January 18, 2013, the DOE described Mather's career pathways in "carpentry, masonry, landscaping and decorative finishing." In the EIS published on August 30, 2013, the DOE describes Mather's career pathways in "carpentry, masonry, and stewardship and conservation." The substance of these career pathways remains unchanged, but after many months of working with the industry partner, the terminology has changed to reflect the industry terminology most commonly used.

Comment 1(d) notes that Ellis Island is currently closed and questions the availability of adequate sites for student fieldwork. Ellis Island is one of many sites that Mather students may visit for field work. Mather students may visit any one of the several parks and monuments

operated by the National Park Service in New York City, including the African Burial Ground National Monument, the Castle Clinton National Monument and the Governor's Island National Monument, among other sites.

Comment 5(a) expresses concern about disruption to UA-EM students as a result of the move. The DOE recognizes that re-siting UA-EM in its second year causes a disruption to students, faculty and staff as they have to adjust to a new building with different co-located schools. However, this move is necessary to ensure that Mather has adequate lab space to meet its instructional needs.

Comment 7 asks about the proposal's benefit for Mather. Re-siting Mather to M625 will ensure that the school is located in a facility that can support its instructional needs.

Comment 5(b) expresses concern that UA-EM's re-siting will make for longer commutes for students. UA-EM, like many high schools throughout New York City, enrolls students from all five boroughs. Some of those students may have a longer commute from their homes to the M520 building, while the commute for other students (particularly those students coming from Brooklyn and Staten Island) may be shorter.

Comment 5(c) expresses concern about safety issues at Bergtraum. 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 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.

Comment 5(d) expresses concern that Bergtraum will close, causing further disruption to UA-EM. The DOE has no plans to close Bergtraum and fully intends for M520 to be the long-term site for UA-EM.

Comments 1(e) and 2(b) express support for the proposal and do not require a response.

Comment 8 does not relate to the proposal and does not require a response.

### **Changes Made to the Proposal**

No changes have been made to this proposal in response to public comment.