Department of Education
Dennis M. Walcott, Chancellor

Public Comment Analysis

Date:	December 19, 2012
Topic:	The Proposed Co-location of a New Public Charter School Success Academy Charter School Brooklyn 7 (84KTBD) with Existing School Brownsville Academy High School (17K568) in Building K907 Beginning in 2013-2014
Date of Panel Vote:	December 20, 2012

Summary of Proposal

In an Educational Impact Statement ("EIS") and Building Utilization Plan ("BUP") posted on November 5, 2012, the New York City Department of Education ("DOE") proposed to to site Success Academy Charter School Brooklyn 7 (84KTBD, "SA - Brooklyn 7"), a new public charter school that will serve students in kindergarten through fifth grade in building K907 ("K907"), located at 1150 East New York Avenue, Brooklyn, NY 11212, in Community School District 17 beginning in 2013-2014. SA - Brooklyn 7 would be co-located in K907 with Brownsville Academy, an existing transfer[1] high school that serves students in tenth through twelfth grades. 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. K907 also houses two community based organizations ("CBOs"), the New York City Mission Society and CAMBA.

SA - Brooklyn 7 is a new public charter school that is authorized by its charter authorizer, the State University of New York Charter Schools Institute ("SUNY") to serve grades K-5. Success Academy Charter Schools ("SACS"), is a charter management organization that currently operates 12 public elementary charter schools in New York City. SACS has been authorized by SUNY to operate six new public elementary charter schools starting in 2013-2014, including SA - Brooklyn 7. The four SACS elementary schools that received Progress Reports have received an overall grade of A for both 2010-2011 and 2011-2012 school year.

If this proposal is approved, SA - Brooklyn 7 would open in September 2013 and would serve 164-210 students in kindergarten and first grade, and would add one grade each year until it reaches full scale in 2017-2018. At that time, SA - Brooklyn 7 would serve approximately 434-556 students in kindergarten through fifth grade. The school would admit students via the charter lottery application process, with preference given to District 17 residents, and a set aside, described in more detail below, for English Language Learners ("ELLs").[2]

K907 has been identified as an under-utilized building. K907 has the capacity to serve 503 students, but in 2012-2013, Brownsville Academy is only projected to serve 225 students.[3] This yields a building

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[1] Transfer schools are small, academically rigorous high schools designed for over-age, undercredited students. Students designated as "over-age, under-credited" are considered to be two or more years behind his or her expected age and credit accumulation.

[2] For more information about the charter school lottery application process, please consult the DOE's directory of NYC Charter Schools, which can be accessed on the DOE's website: http://schools.nyc.gov/community/planning/charters/For+Parents.

[3] Based on the 2012-2013 budget register projections.

utilization rate of approximately 45%,[4] which demonstrates that the building is "underutilized" and has space to accommodate additional students. In 2017-2018, K907 would serve 644-796 students between SA - Brooklyn 7 and Brownsville Academy combined, which yields a projected utilization rate of 128%-158%. 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. The School Construction Authority ("SCA") estimates that building K907 will have a target building capacity of 658 once SA - Brooklyn 7 has fully phased into the building and the building is programmed more efficiently. SCA's updated target capacity for the building would result in a projected utilization rate of 98%-121% once SA - Brooklyn 7 is fully phased into the building.

K907's utilization rate is calculated based upon 2010-2011 Blue Book target capacity for the building, which is 503. However, this capacity number would change once the building is programmed differently and rooms are used more efficiently as a result of this co-location. The SCA estimates that building K907 will have a target building capacity of 658 once SA - Brooklyn 7 is fully phased into the building in the year 2017-2018 and both schools occupy the building. This increase in the building's target capacity is a result of programming rooms and modifying their usage (e.g. from administrative to instructional spaces). Administrative spaces have a smaller capacity than instructional spaces. Once utilization is calculated using SCA's estimate for the building (658), the projected utilization rate of the building once SA - Brooklyn 7 is fully phased in is 98%-121%.

Copies of the EIS describing this proposal and the accompanying BUP are available in the main office of Brownsville Academy. It is also available on the DOE's website at: http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2012-2013/Dec2012Proposals.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held on December 6, 2012 at K907. Participants had the opportunity to provide input on the proposal.

Approximately 23 members of the public attended the hearing, and 8 people spoke. Present at the meeting was Brooklyn High Schools Superintendent Karen Watts; Principal of Brownsville Academy LaShawn Robinson; a representative from SUNY, Liz Genco; a representative from New York City Council Member Darlene Mealy's office; and Gregg Betheil and Savita Iyengar from the Department of Education.

Members of the Community Education Council ("CEC") 17 were invited to the Joint Public Hearing but did not attend.

The following comments and remarks were made or submitted at the Joint Public Hearing on October 25, 2012:

1. A representative from New York City Council Member Darlene Mealy's office stated:

[4] All references to building utilization rates in this document are based on target capacity data from the 2010-2011 Blue Book and enrollment data from the 2012-2013 budgeted register projections. 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.

   a. Brownsville Academy is an incredible school. The principal and staff have helped students achieve academic success.
   b. The proposal directly contradicts DOE's criteria for a co-location because (1) the school is not failing and (2) the building is under-utilized. Brownsville Academy does not fall into the first criteria. NY Post named Brownsville Academy as one of the top 25 High Schools in the city with a Progress Report grade of A.
   c. Brownsville Academy doesn't meet the second criteria either. The school's model depends on small class sizes that serve a diverse population with different learning levels. The school needs small class sizes; this proposal would make that impossible because it only allocates Brownsville eight full size classrooms.
   d. This proposal alters the capacity of the building which poses safety concerns.
   e. Council Member Mealy urgently requests that DOE allow the scholars to continue their upward trajectory by rejecting this proposal.
2. A SACS parent stated:
   a. You always make way for education. You always find a way to put children first. SACS has greatly impacted my family and the community. If we could find a way to share the space in the building, that would be great. It's not 'our school' vs 'their school'. It's about education.
3. A SACS parent stated:
   a. SACS has taught kids to understand numbers and calculations. SA - Brooklyn 7 can only enhance this community by providing kids with an education beyond what is standard. The point is to educate these kids and teach them that they can succeed. The school is doing wonderful things with reading and math.
4. A Brownsville Academy student stated:
   a. We are not against any form of enhancing children's education. We've grown comfortable in this environment. Why fix something that's not broken? Brownsville Academy is one of the top 25 schools in NYC and this proposal may endanger that.
   b. I came from Sheepshead Bay with classes of 20-25 students and I was shunned because teachers didn't have enough time to give individuals help. Brownsville Academy helped me individually in small classrooms where everyone can work together and teachers can assess individual needs.
5. A Brownsville Academy student stated:
   a. Brownsville Academy was designed for "us". We are in a community where statistics say that children of our age and demographic aren't successful. Brownsville Academy was built for this demographic. This school gives children from broken homes an opportunity to excel.
   b. By taking away space, the DOE is changing the school's model and degrading the quality of our education. We are here because we went to schools with large classrooms and we were not successful that is why we came here. This school deserves more. Having a small class and attending Brownsville Academy was the best choice I made.
6. A Brownsville Community resident stated:
   a. The small class sizes are essential to Brownsville Academy's environment. I am not against enhancing education.
   b. I am not against enhancing education, but mixing older children with elementary school children disrupts the integrity of Brownsville Academy
7. An SACS parent stated:
   a. Change is hard, but I know that this works. If we're going to share the space, how can we work together to make this productive. I've seen co-locations work in other scenarios.

Maybe we need to look at this from a different perspective - how can we work as a cohesive body to make this work

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

8. A Brownsville Academy parent commented:
    a. We have a great resource in our community. SA - Brooklyn 7 is taking resources away from our children and community. She requested that a DOE official call her back to explain the rationale for this proposal.
    b. The DOE did not consider safety when it proposed to co-locate a high school with an Elementary School.
    c. Also, how can 800-900 students exit a building during a fire when half of them are Kindergarteners?
    d. You are messing up a great school with this craziness. Leave our school alone. You will find out on 10/17 at our press conference what we mean by "leave our school alone
9. A Brownsville Academy parent stated:
    a. He is very perturbed about the shared space situation in the building. We have a high school that's working for us and we don't know why this is happening.
    b. This is a safety concern in regards this proposal because our building cannot fit this many students in the building. All of the students cannot get out of the building safely in case of a fire.
10. An SACS parent commented:
    a. I am writing in support of SA - Brooklyn 7 coming to District 17. I think that parents and children deserve the right to have more options when it comes to education. Currently, I have a daughter and a niece that attend SACS. My daughter attends the Williamsburg location and my niece the Bed-Stuy 2 location. Since our family has became a part of the SACS family we have been very happy with our children's education and we share their excitement about attending school each day. I think that having this option in this District would not only be something parents welcome, but also something they will come to appreciate. I fully support SA - Brooklyn 7 coming to District 17.
11. The following letter was submitted by the Youth Services Planning Committee
    a. We feel that the proposed co-location is a mismatch, and more than likely will affect the performance of the Brownsville Academy scholars
    b. We understand that Brownsville Academy is an A+ school, and we understand that they have been this successful because of the space allocated to them and because of the intimacy that space provides them.
    c. Being shoved into a smaller area also impacts the school's ability to expand. This co-location space-allocation is assigned by the Department of Education and is based on the projection that Brownsville Academy is expected to increase by 6.67% over the next 4 years, while Success Academy is expected to increase by 70.5% within that same timeframe. Based on these projections, Brownsville Academy will be downsized from 34

rooms to 11 rooms, leaving Success Academy with the opportunity to grow into 23 rooms. We feel that this is an unfair split based on unbalanced expectations.

d. One problem leading to deliquient behavior among teen adults is that they drop out of high school with no skills training. They literally have nowhere to go or place to turn to; many of them turn to the streets. It is because of schools like Bronwsville Academy that these teens have a place to turn to, a place to begin over, a second chance. We feel that space should remain available to them in the best environment possible, providing them the best chance for success, like an A+ school.
e. Furthermore, we feel that this site is well on its way to becoming a landmark site. This is the only school in Brownsville bearing its name. To add to its history, the scholars have branded the building with beautiful artwork they have created, revealing their story and and life. These images are embedded into the bones of the building, we would like to hold on to this building for these special reasons. Once Brownsville Academy is squeezed out of its space, what will be left of the building that is named after Brownsville?
f. We, here in District 16, have lost, and witnessed the closing of many traditional public schools because they have been over-run by charter schools.
g. Finally, the YSPC has concerns regarding discretion. Brownsville Academy High School is a school for young adults (ages 17-22). We feel that placing very young children with young adults returning to high school is not advisable. There is but one entrance to the building; restrooms can and will become an issue, as well as security. Brownsville Academy is proud to have a clean record in that regard. However, we would like this school to maintain its well-deserved reputation
h. We, the YSPC, welcome charter schools into our community; some have been very successful. Ultimately, we would like to see more partnerships between traditional schools and charter schools and more collaboration between organizations. We feel that a round-table discussion with both schools to determine needs can lead to a resolution, including proposing another site in the area more suitable for a charter school because we are aware of a few other alternate sites.

12. Several commenters asked that we help them to save their school and express general opposition to the co-location
13. Several commenters stated that Brownsville Academy is a high performing school and an A school. They mentioned the school's academic support for its students and its great leadership and staff
14. Several commenters expressed concern about the co-location's impact on Brownsville Academy's academic programming with regards to its loss of space. Specifically mentioned are its writing center, college office, technology labs and dance room. Commenters state that Brownsville Academy utilizes their current space efficiently
15. Several commenters expressed concern that this proposal would lead to over-crowded classrooms and the loss of small class sizes
16. Several commenters mentioned that mixing elementary school students with transfer high school students is not a good idea.

17. Several commenters expressed concern over the safety of students if this co-location proposal passed, particularly with regards to fire exits.
18. Several commenters expressed concern that Brownsville Academy will be closed down.

19. A Petition to Oppose the proposal to co-locate Success Academy Charter School – Brooklyn 7 was submitted:
    a. Brownsville Academy opposes the proposal to co-locate SA- Brooklyn 7 in the building. This shared space proposal created by the DOE generates serious questions in regards to overcrowding, fire safety and consequently, the quality and continuity of educational resources at Brownsville Academy.
    b. We are concerned that the size of the incoming school would cause an unsafe situation within the school building.
    c. Brownsville Academy would not have the space necessary to continue to provide a top-notch education for our most underserved and needy scholars.
    d. This building lacks significant space for an additional school community of over 500 scholars. Currently, Brownsville Academy has an enrollment cap of 250 scholars. The proposed school would add an additional 434-556 scholars. In total the building would house approximately 900 people, including teachers and staff members. This poses serious safety concerns for a building that according to the Blue Book has a capacity of 503 people.
    e. In the event of an emergency, there are only two active stairwells that can be used to evacuate the building. It would pose a serious safety risk to both scholars and staff members to evacuate over 900 people in a timely and safe manner through these two stairwells.

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

Comments 2, 3, 7 and 10 are in favor of the proposal and do not require a response.

Comment 11(f) is not directly related to the proposal and thus does not require a response.

Comments 1(a), 1(e), 4(a), 5(a), 8(a) , 8(d), 11(a), 11(b), 11(d), 12, 13, and 18(a) voice general opposition to the proposal because of Brownsville's academic success.

The DOE commends Brownsville Academy on its past and continued success. The DOE has no reason to believe that this proposal will impact Brownsville Academy's success or ability to continue to support its students, but the DOE notes there is a need for increased educational options for students in Brooklyn, including those students who live in District 17. The DOE strives to ensure that all students in New York City have access to a high-quality school in an appropriate environment at every stage of their education. This proposal aims to provide a new educational option for these students.

The four operating SACS schools that received a Progress Report for the 2010-2011 and 2011-2012 school years received an overall grade of A. Further, students at SACS schools have performed well on

Statewide standardized tests. At these schools, 96% of students tested proficient in Math on the New York State Tests in 2012 and 88% of students tested proficient in ELA.

Comment 18 expresses concern about Brownsville Academy being closed down.

The DOE is not planning to close Brownsville Academy. The DOE commends Brownsville Academy on its past performance and supports its continued success. The DOE has no reason to believe that this proposal will impact Brownsville Academy's success or ability to continue to support its students, but the DOE notes there is a need for increased educational options for students in Brooklyn, including those students who live in District 17.

Comments 1(d), 8(c),9(b), 17, 18(b) and 18(e) address safety concerns related to the co-location. The DOE does not believe that this proposal will result in unsafe conditions for students.

K907 has been identified as an under-utilized building. K907 has the capacity to serve 503 students, but in 2012-2013, Brownsville Academy is only projected to serve 225 students. This yields a building utilization rate of approximately 45%, which demonstrates that the building is "underutilized" and has space to accommodate additional students. Once SA- Brooklyn 7 has fully phased into the building if this proposal is approved, K907 would serve 644-796 students between SA-Brooklyn 7 and Brownsville Academy combined.

While this would yield a projected utilization rate of 128%- 158% and suggest that the 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. Based on current and potential programming of the rooms at K907, the School Construction Authority ("SCA") estimates that building K907 will have a target building capacity of 658 once Success Academy - Brooklyn 7 has fully phased into the building and the building is programmed more efficiently. Using SCA's updated target capacity for the building would result in a projected utilization rate of 98%-121% once Success Academy - Brooklyn 7 is fully phased into the building. In addition, the Certificate of Occupancy issued by New York City Department of Buildings for K907 states a maximum occupancy rate of 992, which is sufficient to safely accommodate all students and staff of both schools, should the co-location be approved.

Finally, the DOE will work with the principal of Brownsville Academy on a fire safety plan and support any work required to make all exits usable, should this co-location be approved. Pursuant to Chancellor's Regulation A-414, every school / campus is mandated to form a School Safety Committee, of which both Brownsville Academy and SA-Brooklyn 7 will be members, 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. 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.

Comments 6(b), 8(b), 11(g), and 16 express concerns with the proposals because students of various grade levels would be co-located in the same building, particularly relating to overall safety and the use of bathrooms.

Due to space limitations, it is not unusual for students in various grade levels to be co-located together. While it is not common practice for an elementary school to be co-located with a high school, there are successful examples of K-12 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;
- Mott Hall IV, a middle school, which shares a building with Eagle Academy for Young Men II, which currently serves sixth through eighth grade, and Leadership Preparatory Ocean Hill Charter School, which currently serves kindergarten and first grade;
- Harlem Success Academy 4, an elementary school, which shares a building with Opportunity Charter School, which serves sixth through twelfth grade in District 3; and
  J.H.S. 13 Jackie Robinson, a middle school, which shares a building with Central Park East I, an elementary school, and Central Park East High School.

As discussed above, every school / campus is mandated to form a School Safety Committee, of which both Brownsville Academy and SA-Brooklyn 7 will be members, 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.

In many of the Buildings where schools are co-located throughout the city, each school is assigned restrooms on the floors where ttheir classrooms are located. Moreover, each school is told or instructed to use specific stairways. These measures are taken to cultivate cohesive cultures within each school. Separation between schools is intended to limit any issues that might arise from groups of students who may not know each other well and to nurture school unity. Thus, at no point would the DOE suggest that Brownsville students must use the same restrooms as SA-Brooklyn 7. Rather, the DOE anticipates that each school have use of its own dedicated restrooms located where each school is located. If the assignment of specific bathrooms is not an adequate solution, the Building Council is empowered to discuss alternative arrangements.

<u>Comment 9(a), 14, 18(c) and 18(d)</u> express concern with the space allocations and the issue of shared space.

There are currently hundreds of schools in buildings across the city that are co-located; some of these co-locations involve multiple DOE schools while others involve DOE and public charter schools sharing space. In all cases, the Citywide Instructional Footprint ("Footprint") is applied to both DOE and public charter schools to ensure equitable allocation of classroom, resource and administrative space.

The DOE seeks to fully utilize all its building capacity to serve students. The DOE does not distinguish between students attending public charter schools and students attending DOE schools. In all cases, the DOE seeks to provide high quality education and allow parents/students to choose where to attend.

The Footprint is the guide used to allocate space to all schools based on the number of class sections they program and the grade levels of the school. The number of class sections at each school are 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

The BUP details the number of class sections each school is expected to program each year through 2017-2018 and allocates the number of classrooms accordingly. The assignment of specific rooms and location for each in the building, including those for use in serving students with IEPs or special education needs, will be made in consultation with the Principals of each school and the Office of Space Planning if this proposal is approved. The BUP demonstrates that there is sufficient space in the building to accommodate the proposed co-location.

Brownsville Academy will receive its baseline allocation of rooms for every year of this proposal. In the proposal's final year, Brownsville Academy will receive 12 full-size, 1 half-size, 4 quarter-size and 2.5 full-size equivalent of designed administrative space.With respect to concerns that there is no space to co-locate an additional organization in the building, as indicated in the EIS, according to the 2010-2011 Enrollment Capacity Utilization Report (the "Blue Book"), K907 has the capacity to serve 503 students, but in 2012-2013, Brownsville Academy is only projected to serve 225 students.[5] This yields a building utilization rate of approximately 45%,[6] which demonstrates that the building is "underutilized" and has space to accommodate additional students. In 2017-2018, K907 would serve 644-796 students between SA - Brooklyn 7 and Brownsville Academy combined, which yields a projected utilization rate of 128%-158%. 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. SCA estimates that building K907 will have a target building capacity of 658 once SA - Brooklyn 7 has fully phased into the building and the building is programmed more efficiently. Using SCA's updated target capacity for the building would result in a projected utilization rate of 98%-121% once SA - Brooklyn 7 is fully phased into the building.

The BUP includes a proposed shared space schedule for the co-located schools. The final shared space schedule will be finalized by the Building Council if this proposed co-location is approved by the PEP. Principals of the co-located schools sit on the Building Council and are free to deviate from the proposed plan and create a shared space schedule as long as it is agreed upon by both parties. The proposed shared space schedule in the BUP demonstrates that all schools will receive enough time in the cafeteria and library, as well as the other shared spaces, to serve their students based on the school's enrollment.

If the Building Council is unable to agree upon a schedule for shared spaces, there is a mediation process outlined in the Campus Policy Memo, which is available at http://schools.nyc.gov/community/campusgov.

Comments 1(c), 4(b), 5(b), 6(a) and 15 address the need for small class sizes at a Transfer High School and express concern that this proposal would eliminate the small class sizes at Brownsville.

[5] Based on the 2012-2013 budget register projections.

[6] All references to building utilization rates in this document are based on target capacity data from the 2010-2011 Blue Book and enrollment data from the 2012-2013 budgeted register projections. 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.

Transfer schools serve over-age and under-credited students. Each year the number of students and type of classes they might require varies depending on the population of students that enroll. Because of this, it is difficult to predict the number of students served in classes at Brownsville Academy. The principal has the ability to program classes depending on the need and enrollment of the school, and may program larger class sizes in future years. As discussed above and in the EIS and BUP, Brownsville Academy will receive at least its baseline allocation of instructional space under the Transfer High School Footprint.

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

Comment 1(b) contends that one criteria used by the DOE in proposing co-location is existing school performance, and argues that this criteria is not met here because Brownsville Academy is a high performing school.

This statement is incorrect. The DOE does not use existing school performance as a criteria when proposing co-locations. Given the finite number of under-utilized buildings available in New York City, the DOE attempts to use all of its school buildings as efficiently as possible. Co-location is therefore very common in New York City schools – with 33% of all DOE buildings housing more than one school organization -- as there are not sufficient school buildings to allow each school organization to operate its own building.

Comment 11(e) concerns the K907 building and its continued preservation and name.

The DOE understands that members of the community are concerned about the K907 building's legacy and potential to be a landmark building. This proposal does not displace Brownsville Academy from the building, or change the name of the building, or impact the status of the building. The DOE anticipates that if this proposal is approved both school organizations will be able to operate within the K907 building.

Comment 11(c) concerns Brownsville's ability to expand its enrollment in the future.

The DOE projects the proposed co-location will not take seats away from Brownsville Academy or reduce the school's enrollment. As noted in the BUP, the school's enrollment projections are based on the current enrollment of the entry point grade and assumes that the same number of students will articulate up and that there will be stable incoming enrollment at the entry point grade level. The DOE's projections for SA-Brooklyn 7 anticipate that the school will phase-in additional grades each year until it serves grades kindergarten through five. Brownsville Academy's 2010-2011 audited enrollment was 225 students. The DOE has projected a range of 210-240 students throughout the phase-in of SA – Brooklyn 7. Thus, the DOE has projected stable enrollment for Brownsville Academy throughout the years when SA-Brooklyn 7 phases in. To the extent that the commenter is suggesting that Brownsville Academy will serve additional students in the future, the DOE notes that are projections are based on current enrollment and historical trends.

Comment 11(h) suggests that the DOE should solicit feedback from both schools on the schools' needs and alternate sites for the charter school.

The DOE appreciates all feedback from the community regarding a proposal. When the EIS and BUP are issued, they are made available to the staff, faculty and parents at Brownsville Academy 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 from the community on this proposal. Furthermore, all schools' staff, faculty and parent communities are invited to the Joint Public Hearing to solicit further feedback.

Although the DOE recognizes that people in the community may have strong feelings against this proposal, the DOE believes that, if this proposal is approved, the school communities at Brownsville Academy will be able to create productive and collaborative partnerships. As noted above, this building is currently under-utilized and this proposal aims to fill that space with an additional educational option for families.

Changes Made to the Proposal

No changes have been made to this proposal.