

Public Comment Analysis

Date: December 19, 2012

Topic: The Proposed Temporary Co-location of New School M.S. 311 (24Q311) with Existing Schools Civic Leadership Academy (24Q293), Pan American International High School (24Q296), VOYAGES Preparatory (24Q744), and Queens Transition Center (75Q752) in Elmhurst Educational Campus Building Q744 Beginning in the 2013-2014 School Year and Continuing through the 2014-2015 School Year, and the Proposed Re-siting and Co-location of M.S. 311 with a D75 School in New Building Q311 Beginning in the 2015-2016 School Year

Date of Panel Vote: December 20, 2012

Summary of Proposal

The New York City Department of Education (“DOE”) is proposing to temporarily co-locate M.S. 311 (24Q311, “M.S. 311”), a new district middle school, in Elmhurst Educational Campus building Q744 (“Q744”), located at 45-10 94th Street, Queens, NY 11373 in Community School District 24, in September 2013 before it moves to new construction building Q311 (“Q311”), located at 97-11 44th Avenue, Queens, NY 11368, by the 2015-2016 school year. M.S. 311 would be co-located temporarily in Q744 with Civic Leadership Academy (24Q293, “Civic Leadership”), an existing high school serving students in grades nine through twelve; Pan American International High School (24Q296, “Pan American”), an existing international high school serving students in grades nine through twelve; VOYAGES Preparatory (24Q744, “Voyages”), an existing transfer school serving students in grades nine and twelve; and P752@Q744, one site of a multi-site District 75 (“D75”) school (Queens Transition Center, “75Q752”), serving students in grades eight through twelve.¹ After two years in Q744, M.S. 311 would be re-sited and co-located with a yet-to-be determined D75 school (“75QTBD”) in new building Q311, which is designed to accommodate a middle school and a D75 school and is expected to be completed for occupancy by the 2015-2016 school year. 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.

Civic Leadership is a limited unscreened high school serving 454 students in ninth through twelfth grades during the 2012-2013 school year. Pan American is a screened international high school serving 358 students in ninth through twelfth grades who have lived in the United States for four years or fewer at the time of admission to high school and whose home language is not English. International schools are designed to provide quality education for recently arrived immigrant students through a unique educational model. Voyages is a transfer school serving 250 students who are 16 years of age or older. Transfer schools are small, academically rigorous high schools designed to re-engage students who have dropped out of high school or have fallen behind. These schools are designed to create a personalized learning environment and to provide students with connections to college. Students graduate with a high school diploma from the transfer school they attend.

¹ 75Q752 is an existing D75 school that serves a combined total of 429 students in sixth through twelfth grades during the 2012-2013 school year. 75Q752 currently has five sites in Queens, including P752@Q744.

P752@Q744 serves approximately 54 students in grades eight through twelve who are classified as intellectually disabled (“ID”), learning disabled (“LD”), or mentally retarded (“MR”) under an Individualized Education Program (“IEP”), in Self-Contained (“SC”) sections in 12:1:1 classrooms settings (ratio of students: teacher: paraprofessional).² Students are placed in D75 programs based on their individual needs and recommended special education services and are referred to D75 during a period that extends into summer.

M.S. 311 is a new zoned middle school that, if this proposal is approved, would open in September 2013 in Q744, where it would be co-located with Civic Leadership, Pan American, Voyages, and P752@Q744. In 2013-2014, M.S. 311 would enroll approximately 110-135 students in sixth grade. In 2014-2015, M.S. 311 would serve approximately 210-255 students in sixth and seventh grades. In 2015-2016, M.S. 311 would move to a long-term location in new building Q311 and complete its grade expansion, serving students in grades six through eight. In 2017-2018, when the school achieves “full scale,” it would serve approximately 800-825 students in sixth through eighth grades.

On September 24, 2012, Community Education Council 24 (“CEC 24”) voted to create a new temporary incubation³ zone for M.S. 311 beginning in September 2013 and a long-term zone for the school when it moves into Q311 beginning in September 2015.⁴ For the 2013-2014 and 2014-2015 school years, only students living in the incubation zone would be zoned to M.S. 311. The full M.S. 311 zone would take effect in September 2015, when M.S. 311 would be re-sited to Q311. If the proposal to co-locate M.S. 311 in Q744 is approved, beginning in September 2013, sixth grade students living in the M.S. 311 incubation zone would be zoned to M.S. 311.

Q744 has been identified as an under-utilized building. Q744 has the capacity to serve 1,482 students.⁵ In the 2012-2013 school year, the building will serve only 1,116 students,⁶ yielding a utilization rate of 75%.⁷ If this proposal is approved, there will be sufficient space to accommodate Civic Leadership, Pan American, Voyages, P752@Q744, and M.S. 311. In the final year of M.S. 311’s incubation, the Q744 building would serve approximately 1,268-1,425 students, yielding a building utilization rate of 86%-96%.

If this proposal is approved, M.S. 311 would be re-sited to new building Q311 in September 2015, and would be co-located with 75QTBD. Because it will be a newly constructed facility, no school organization currently uses space at Q311. The building is projected to have the capacity to serve 785 students.⁸ If this proposal is approved, M.S. 311 students in sixth and seventh grades would be re-sited to Q311 for the 2015-2016 school year and co-located with 75QTBD. During the 2015-2016 school year, these organizations would serve approximately 525-590 students, yielding a projected building utilization

² School-reported data as of September 28, 2012.

³ The word “incubation” in this context means that a school opens with one grade in a temporary location and gains a grade each year until it is re-sited to a long-term location where it can grow to scale.

⁴ The zone proposal for M.S. 311 is available at <http://schools.nyc.gov/community/planning/changes/queens/feedback?id=212>.

⁵ 2011-2012 Enrollment, Capacity, Utilization Report (“Blue Book”).

⁶ 2012-2013 Budgeted Register Projections.

⁷ Projected enrollment figures and anticipated utilization rates for Q744 are based on target capacity data from the 2011-2012 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.

⁸ SCA Building Completions Report as of April 26, 2012.

rate of 67%-75%.⁹ When M.S. 311 reaches full-scale in 2017-2018, it is anticipated to serve a total of approximately 800-825 students. 75QTBD is projected to serve approximately 50-60 students in 2017-2018, yielding a projected building utilization rate for both organizations of 108%-113%.

To address overcrowding and plan for efficient use of new buildings, the DOE frequently employs the strategy of incubating a school until it can be re-sited to new construction. Under this proposal, M.S. 311 would follow the same strategy. M.S. 311 would incubate grades six and seven in its temporary location in Q744 until September 2015, when it would be re-sited to Q311 and serve students in grades six to eight. The incubation of M.S. 311 in Q744 would help alleviate middle school overcrowding in Corona/Elmhurst in September 2013, two years before new construction is available. Q744 is located less than half a mile from Q311, and its facilities include science labs appropriate for middle-school aged students.

If re-siting M.S. 311 to new construction after the 2014-2015 school year is not feasible for any reason, the DOE will re-assess the space at Q744 and, if appropriate, extend the co-location, or propose an alternative siting plan. The DOE would issue a separate Educational Impact Statement (“EIS”) describing any alternate plan for M.S. 311 or Q744.

By temporarily co-locating a new school in Q744, an underutilized building located in an overcrowded middle school zone, the DOE seeks to alleviate overcrowding in Corona/Elmhurst and take advantage of available capacity to serve students zoned to this area. This proposal would help alleviate middle school overcrowding in Corona/Elmhurst in the coming year as well as plan for the efficient use of space when Q311 is completed so that Q311 can serve M.S. 311’s full grade span.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding the proposal was held at Elmhurst Educational Campus on November 28, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal.

Approximately 136 members of the public attended the hearing and 27 people spoke. Present at the meeting were Queens High Schools Superintendent Juan Mendez; Joan Klingsberg, Principal of VOYAGES Academy; Phuong Nguyen, Principal of Civic Leadership Academy; Minerva Zanca, Principal of Pan American International High School; Fritzy Sannon-Brown, Principal of Queens Transition Center; Ms. Sanchez, Mr. Cardona, and Ms. Cheraquit representing the VOYAGES School Leadership Team; Mr. Solas, Mr. Mejia, Ms. Valbrun, and Mr. Welsh representing the Civic Leadership Academy School Leadership Team; Mr. Andrade representing the Pan American International School Leadership Team; Principal Sannon-Brown represented the Queens Transition Center School Leadership Team; and Jillian Roland, Emily Ades and Allen Miller from the Office of Portfolio Management. District 24 Community Education Council (“CEC 24”) was invited and confirmed attendance, but a representative did not attend.

The following comments and remarks were made at the joint public hearing on November 28, 2012:

⁹ Projected enrollment figures and anticipated utilization rates for Q311 are based on the seat target from the School Construction Authority Building Completions Report as of April 2012 and the forward promotion of cohorts by grade using the planned enrollment at M.S. 311 and 75QTBD. 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.

1. Joan Klingsberg, the Principal of VOYAGES Academy, asserted that:
 - a. VOYAGES is a well-developed, “A”-graded school that ranks among the top 20 high schools in the city.
 - b. The different culture at VOYAGES works for this school, but would prove problematic, even dangerous, for any school sharing a floor with VOYAGES. Examples include chronic disturbance due to use of the public address system regularly through the day, use of lockers across the whole floor, and use of open spaces during lunch and free periods. It is inappropriate to have middle school-aged students lounging with 18-21 year-olds. Taking away distinguishing features of VOYAGES would significantly impact its success.
 - c. Placing a middle school on any floor in the building would create significant safety issues and would threaten the safety, security, and success of schools in the building.
 - d. The Building Council collectively has over 100 years of education experience and designed a viable plan for incubation of the middle school. The city’s dismissal of the plan is deeply disappointing and the City should reconsider its plan.
2. Michael Cardona, a member of the VOYAGES SLT, stated that the entire staff supports the shared space plan developed by the building council and asserted that it is the only plan that ensures the safety and continued culture of the schools in the building.
3. Phuong Nguyen, the Principal of Civic Leadership Academy, asserted that:
 - a. The building is underutilized by design on the part of the DOE, and not by circumstance of schools being under-enrolled. The placement of a transfer school in this building guarantees that the building will always be under-utilized. The principals have responded to the building’s underutilized status with suggestions for use of space, but their proposals have never been considered.
 - b. Housing two groups of students with two different developmental needs in the same building is not a good idea.
 - c. Certain conditions need to be respected and established for all schools to thrive and grow on the campus. VOYAGES and Civic Leadership Academy are A-rated and in the top 25 schools in New York City, and both have strong cultures. The physical layout of the building allows schools to co-exist and respect each other’s boundaries and culture. The principals know what is needed for the success of new schools, and they collaborated on a plan that allows schools to maintain their own spaces and identities.
 - d. Voices of the principals in the building should be respected and active in the creation of a co-location plan.
4. Malik Solis, the Dean of Civic Leadership Academy/a member of the Civic Leadership Academy SLT, expressed the following concerns:
 - a. Many students struggle with the adjustment from middle school to high school and if we bring in middle school students who are younger than a typical high school student, bullying and fighting would be a reality.
 - b. It is frightening to think of an 11 year-old interacting daily with an 18 year-old in the bathroom.

- c. If we have to focus on the safety and well-being of young children, we will spend too much time and man-power on this. This would leave students vulnerable to negative influences.
5. James Welsh, a member of the Civic Leadership Academy SLT, stated:
 - a. Civic Leadership Academy is too big of a school for the 4th floor alone; adding another school will not help alleviate this problem, but would create a struggle for use of limited spaces including needed space for speech therapy, physical therapy, and mandated counseling for students with IEPs.
 - b. The basement is designed to house music and theater, and the offices in the basement and on the first floor are designed for therapy.
 - c. Adding 125-150 students to the cafeteria would result in overcrowding and a perceived invasion of space by students.
 - d. Co-locating a middle school with a high school enables unwanted intermingling of middle school students and adult students and neither middle nor high school students always make the right decisions in these manners.
 - e. A shared space may result in a conflict over the limited multi-purpose rooms.
 - f. Disagreements and hard feelings can extend way beyond the incubation of a school on this campus: What will happen when we do not have the space to continue to operate afterschool programs like they have in the past?
6. Sylvia Sanchez, a member of the VOYAGES SLT, expressed her concern about the social and emotional impact of losing counseling space and co-locating a middle school with a high school:
 - a. The school culture of integrating academics and counseling in a safe space allows for over age and undercredited students to grow as productive young adults. Part of VOYAGES' success has been having counseling sessions in private space. Having this space is a necessity, not a luxury, and the quality of services would be compromised by adding another school.
 - b. Our population is handling adult-like situations and is emotionally different and more likely to engage in high-risk behaviors; it is detrimental for middle school-aged students at an impressionable age to be exposed to these behaviors.
7. One commenter expressed concern about the consequences of disrupting the culture of a top school that successfully serves a high need, at risk population.
8. One commenter stated:
 - a. The co-location will cause overcrowding and take resources away from schools already in the building. For example, administrators would need to take time from essential tasks to arrange scheduling.
 - b. Co-locating a middle school and a high school is inappropriate; middle school-aged students should not be present in a high school environment, no matter how supposedly temporary.
 - c. With the vast resources at the DOE's disposal, the DOE should find another solution. 11 year-olds do not belong in this building with these students who are flourishing and doing well in this situation. Under-utilized status does not take into account the human needs of each student in the building.

9. Five commenters expressed concern about Civic Leadership Academy losing its afterschool program and sports.
10. Three commenters expressed concern about housing the new school in the basement and losing Civic Leadership Academy's music program.
11. One commenter requested that the Building Council re-consider keeping the theater space in the basement, citing the importance of this growing program to students at Pan American International High School.
12. Seven commenters expressed concern about losing the limited space in the building and resulting overcrowding from co-locating a new school in the building.
 - a. Two commenters also added that students deserve more, not less.
 - b. Another commenter stated that VOYAGES would be overcrowded if the school lost half of a floor. The commenter cited personal experience in an overcrowded high school that did not give her the attention or support she needed.
 - c. One commenter stated that her son was an honors student until he came to a middle school where he experienced bullying and mean teachers due to overcrowding, and where he had no outlet to allow him to grow. At Civic Leadership Academy, there is adequate space for her son to grow.
13. Two commenters added that co-locating a new school in the building would cause overcrowding particularly in the shared spaces such as multipurpose rooms and lunchrooms.
14. Three commenters expressed concern for the middle school students and suggested that co-locating a middle school in this high school building would have a negative social influence on middle school students.
 - a. One commenter stated that he would not want his own child to attend the school and be around students who are older since it is easy for students of all ages to want to fit in with older people.
15. Two commenters expressed concerns about the chaotic environment that ensues from the co-location of middle school students with high school students. One of these commenters stated that she came from a school where a middle school was co-located with a high school and the environment was chaotic even though the schools had two different floors.
16. Two commenters expressed a general concern about the safety of co-locating middle school aged students with high-school aged students.
 - a. One commenter added that you won't put 1st graders with 6th graders, so why would you put 6th graders with high school students?
17. Three commenters expressed concerns about the impact of the co-location on the success and culture of the schools in the building. One of the commenters stated that Civic Leadership Academy is ranked in the top 20 schools in the city due to the space it is provided and that no amount of money or funding provided for the co-location would account for the devastation that current students would feel if they lost space.
18. One commenter stated that this proposal works great on paper, but not in the reality of the schools in the building. The commenter also stated that the students are not figures and numbers, but those with names, stories and accomplishments.

19. One commenter stated that transfer students would feel as if they were back-tracking and babysitting if middle school students were located in the building.
20. One commenter expressed concern about losing counselors' offices at VOYAGES, stating that the level of privacy and amount of support provided by counselors at VOYAGES is extraordinary. The commenter stated that the first time he had a conversation with his counselor at his previous high school was the day he made the choice to transfer to VOYAGES.
21. One commenter stated that it is not a good idea to bring a new school into Elmhurst Educational Campus.
22. James Vasquez, the Queens High School UFT representative, stated that the DOE should listen to the school communities, adding that the DOE makes decisions based on numbers in an office downtown and does not seem to understand that this is about our young adults and their development and growth.

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

During the public comment period, in total, sixteen comments were received via email regarding the proposal and two comments were received via telephone.

23. Joan Klingsberg, the Principal of VOYAGES Academy, asserted her disappointment with the City's decision to dismiss the shared space plan submitted by the principals in Q744. She asserted that this is the only way to ensure the safety and security of all schools in the building, and that mixing 11-14 year-olds with 18-21 year-olds and failing to create separate space for each school will create an unsafe environment. She requested that their plan be reconsidered and that their voices be heard.
24. Two commenters expressed concerns about sharing classrooms during this incubation. One commenter spoke from her unsuccessful experience sharing classrooms in the past, and one commenter wrote that sharing classrooms with other teachers who are not even colleagues is problematic and will conflict with setting up classrooms in a way that fosters inspiration and learning.
25. Ten commenters expressed concern about the safety of co-locating middle school students with transfer and high school-aged students and the bad examples transfer school students would set for impressionable middle school students, citing exposure to substance abuse and gang presence, and the threat of sexual activity. One commenter added that having students from Pan American or Civic Leadership Academy on the same floor as VOYAGES would create similar problems since Civic Leadership Academy students are younger and impressionable, and the presence of students from Pan American would increase the chances of gang-related conflict. One commenter cited her work in a school that served students in grades six through twelve, where, regardless of the school's attempts to separate the middle and high school, she witnessed older students taking advantage of younger students.
26. Three commenters expressed concern that it would be irresponsible to house 18-20 year old students with 12-14 year-olds on the same floor, particularly when that floor only has one bathroom.

27. One commenter stated that the DOE would have notified parents of the middle school children about the co-location in Q744 if the DOE did not think that this proposal was unsafe and a bad idea.
28. Eight commenters asserted that the classrooms would be overcrowded and that this would threaten the success of all schools and students in the building. Some commenters added that VOYAGES and Civic Leadership Academy are among the top 20 high schools in New York City, VOYAGES is successful because of its unique school culture where students feel safe and welcome, and incubating a middle school in this setting would cause instant interruption and disorder. One commenter added that there is not room for more students on this floor, and that adding another school would cause conflict and also disrupt the structure that the VOYAGES students need.
29. One commenter stated that classrooms not used for teaching are always occupied by students completing make-up work or staff for meetings and that the hallways are crowded during passing periods. The commenter added that the guidance suite is a necessity for students who are required to have regular counseling but who would not respond without private offices in which they can meet confidentially.
30. Three commenters stated that if placing another school in this building is deemed appropriate and/or necessary, then the DOE should consider alternatives that can minimize the potential dangers of co-location. One commenter stated that these alternatives include utilizing administrative space and basement rooms, where there are separate bathroom facilities, or building separate bathroom facilities for middle school students on their side of the second floor, for example converting the staff lounge which has plumbing into a bathroom. Two commenters asked if the DOE is willing to pay for remodeling on the first floor.
31. One commenter expressed her disagreement with the proposal, stating that Civic Leadership Academy's lounge area would be crowded. The commenter expressed fear that Civic Leadership Academy may not share a floor with the new school but it is still in the same building.
32. One commenter expressed concern about losing after school programs during this co-location.
33. Community Education Council 24 sent Resolution #75 opposing the co-location of M.S. 311 in the Elmhurst Educational Campus, which stated the following:
 - a. The Community Education Council of District 24 was not given a plan to review in order to approve the co-location of M.S. 311 in Elmhurst Educational Campus.
 - b. The Community Education Council of District 24 cannot be assured of the proper supervision of our middle level students in this setting.
 - c. Potential conflicts in the use of shared spaces could hinder the ability to provide all students with state required services.
 - d. The Community Education Council of District 24 opposes the co-location of M.S. 311 within the Elmhurst Educational Campus.

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

Comments 1(a-c), 3(b), 4(a-c), 5(d), 6(b), 7, 8(b-c), 14-17, 19, 25-26 and 33(b) express concerns about placing middle school students in a building with high school age students, including concerns about the

safety of this co-location as well as concerns about the negative impact of co-location on the success of schools and students in the building.

In regards to concerns about the impact of the co-location on the success of each school, the DOE works to ensure that students and families in every community have high-quality educational options. In an effort to increase choice and access to high-quality educational options, but due to space limitations, it is not unusual for varying grade levels to be co-located together. Many school buildings successfully house transfer schools and middle schools. These examples include:

- The I.S. 275 building in Brooklyn houses Kappa V, a middle school; Leadership Preparatory Brownsville Charter School, an elementary school; and two transfer schools Metropolitan Diploma Plus High School, which received an “A” on its progress report and is ranked third of transfer schools in the city, as well as Brooklyn Democracy Academy which received a “B” on its progress report;
- The J.H.S. 25 building in Manhattan houses Lower East Side Prep High School, an A-rated transfer school along with School For Global Leaders middle school and Marta Valle High School;
- The Julia Richman Educational Complex, which houses an A-rated transfer school, three small high schools, a PK-8 school, and a District 75 program;
- Boys High School in Brooklyn, which houses an A-rated transfer school, two secondary schools, one high school, and a District 75 program.

Additionally, many school buildings in Queens and throughout the city successfully house 6-12 schools or separate middle and high schools, such as the Beach Channel Campus and Metropolitan Avenue Campus in Queens where schools that received progress report grades on each campus have received an “A” progress report grade for the 2011-2012 school year. There are also successful examples of K-12 buildings or campuses in New York City. These examples include:

- 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;
- P.S. 241, which shares a building with Success Academy – Harlem 4, another elementary school, and 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.

In regards to the concerns about safety, pursuant to Chancellor’s Regulation A-414, every school/campus is mandated to form a School Safety Committee, which is responsible for developing a comprehensive School Safety Plan that defines the normal operations of the site and what procedures are in place in the event of an emergency. In this case, M.S. 311 and the schools in Q744 would develop a safety and security plan for Q744 prior to the first day of school in September 2013. The School Safety Plan is updated annually by the Committee to meet the changing security needs, changes in organization and building conditions and any other factors; these updates could also be made at any other time when it is necessary to address security concerns. The Committee will also address safety matters on an ongoing

basis and make appropriate recommendations to the Principal(s) when it identifies the need for additional security measures.

In many buildings where schools are co-located, each school is assigned bathrooms on the floors or hallways of their classrooms and specific stairways for students to use. 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. The intention is not to be punitive to any one group of students. If the assignment of specific bathrooms is not working or is inadequate, the Building Council can discuss an alternative arrangement.

In addition, 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.

Comments 1(d), 2, 3(c-d) and 23 support the Building Council's plan for the incubation of the middle school and encourage the DOE to reconsider the plan, and comment 30 suggests separate plans for co-locating the middle school in Q744.

The Building Council in Elmhurst Educational Campus designed a proposed shared space plan for the co-located schools in October. According to the plan, in year one, M.S. 311 would occupy four full-size classrooms, one half-size classroom, and office space in the west side of the building on the first floor, where the school would have a separate entrance and exit. Three of the four full-size classrooms would need conversion from office suites and a staff cafeteria to full-size classrooms. In year two, M.S. 311 would occupy an additional six full-size classrooms and one half-size classroom in the basement. Year two of the plan requires that the orchestra rooms in the basement be partitioned into six full-size classrooms for use by M.S. 311. During the incubation, the converted offices and music rooms would be reallocated to space on the upper floors. The Building Council requested that, when M.S. 311 moves to new construction, the music rooms be returned to their original condition, and the first floor space be converted into assembly space for the building.

This proposal requires construction to convert or partition nine out of ten full-size classrooms for the temporary incubation. The Office of the Comptroller dictates that a capital project must have at least five years of useful life. New schools must wait at least five years before converting rooms because the original capital investment must have at least a five year life span. While Elmhurst Educational Campus opened in July 2008, and is thus in its fifth year of operation, the new school would incubate in the building for less than five years. Thus, this proposal, as well as any other proposal requiring construction for the incubation of M.S. 311, is not feasible because rooms would be converted for a period that is less than five years.

As mentioned in the EIS and above, Q744 is under-utilized and there will be sufficient instructional space to accommodate Civic Leadership, Pan American, VOYAGES, P752@Q744 and the incubation of M.S. 311 as the school phases in. The Building Council is encouraged to draft a revised space plan that does not require construction during the temporary co-location of M.S. 311 in Q744. The final assignment of specific rooms and location for each school in the building will be made in consultation with the Principals of each school and the Office of Space Planning if this proposal is approved.

If the Principals are 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 5(c,e), 8(a), 12(a-c), 13, 24, 28, 31 and 33(c) contend that co-locating a new school in the building will cause overcrowding, including in the shared spaces.

As stated in the EIS, Elmhurst Educational Campus (“Q744”) has been identified as an under-utilized building and the building has capacity to accommodate Civic Leadership, Pan American, Voyages, P752@Q744, and M.S. 311 during the temporary co-location of M.S. 311. Q744 has the capacity to serve 1,482 students. In the 2012-2013 school year, the building will serve only 1,116 students, yielding a utilization rate of 75%. In the final year of M.S. 311’s incubation, the Q744 building would serve approximately 1,268-1,425 students, yielding a building utilization rate of 86%-96%. Therefore, the building has adequate capacity to accommodate the incubation of M.S. 311 alongside Civic Leadership, Pan American, Voyages, and P752@Q744. Projected enrollment figures and anticipated utilization rates for Q744 are based on target capacity data from the 2011-2012 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.

Further, if this proposal is approved, there will be sufficient instructional space to accommodate Civic Leadership, Pan American, Voyages, P752@Q744, and M.S. 311 pursuant to the Citywide Instructional Footprint (the “Footprint”), throughout the period in which M.S. 311 phases in. Please visit the DOE’s Web site to access the Footprint, which guides space allocation and use in City schools: http://schools.nyc.gov/NR/ronlyres/78D715EA-EC50-4AD1-82D1-1CAC544F5D30/0/DOEFOOTPRINTSConsolidatedVersion2011_FINAL.pdf.

The Footprint sets forth the baseline number of rooms that should be allocated to a school based on the grade levels served by the school and number of classes per grade. For existing schools, the Footprint is applied to the current number of classes and class size a school has programmed and is confirmed by a walk-through of the building by the Borough Director of Space Planning and the school’s principal.

For grades 6-12 the Footprint assumes that students move from class to class and that classrooms should be programmed at maximum efficiency. The Footprint allocates one full-size classroom for each general education or Collaborative Team Teaching section, and a full-size or half-size classroom to accommodate each SC special education section served by the school. The Footprint does not require that every teacher have his or her own designated classroom. Principals are asked to program their schools efficiently so that

classrooms can be used for multiple purposes throughout the course of the school day. Built into the high school footprint are resource rooms and the equivalent of 1-2 classrooms for student support services.

In regards to the concerns about overcrowding in shared spaces, as in other situations where schools are co-located, the schools would need to share large common and specialty rooms in the building; namely, the three multi-purpose rooms, two cafeterias, one library, three science labs, six science demo rooms, nurse's office, and weight room. Specific decisions regarding the allocation of the shared space will be made by the Building Council, consisting of principals from all co-located schools, in conjunction with the DOE Office of Space Planning. Classrooms would not be shared between different schools, and each school would be able to operate and program at footprint.

Comments 5(a), 6(a), 20, 29 and 33(c) express concerns about VOYAGES and Civic Leadership Academy losing necessary counseling and resource rooms.

Limited under-utilized space in District 24 coupled with the severe overcrowding and growing enrollment needs require that we use existing public school buildings in the most efficient manner possible. As stated in the EIS and described below, students in Q744 will continue to receive mandated services in accordance with their Individualized Education Programs ("IEPs"), and each school will continue to receive rooms according to footprint.

Civic Leadership, Pan American, and Voyages currently serve general education students and students requiring special education services, including students enrolled in Integrated Co-Teaching ("ICT") classes and Self-Contained ("SC") special education classes, as well as students receiving Special Education Teacher Support Services ("SETSS"). The existing ICT, SC, and SETSS classes at each school will continue to be provided and students with disabilities will continue to receive mandated services in accordance with their IEPs. Services are tailored to meet the individual needs of the students with disabilities attending each school and, as such, may vary from year to year.

Additionally, Civic Leadership, Pan American, and Voyages serve English Language Learners ("ELLs"). ELL students at each school attend English as a Second Language ("ESL") classes. All current and future ELL students attending Civic Leadership, Pan American, and Voyages will receive ESL services in accordance with DOE policy.

As mentioned above, if this proposal is approved, there will be sufficient space for each school in the building pursuant to the Footprint. According to the high school Footprint, Civic Leadership Academy would be allocated one half-size resource room for services such as pull-out services or small group instruction. According to the transfer school footprint, in addition to instructional rooms, VOYAGES would be allocated one half-size resource room in addition to 750 to 1,500 square feet of space for student support services which could include guidance counseling, Learning to Work, and social work services.

As mentioned in the EIS, in 2013-2014, after Civic Leadership, Pan American, Voyages, P752@Q744, and M.S. 311 have received the baseline allocation of full-size classrooms according to the Footprint, 12 excess full-size instructional rooms and 10 excess half-size classrooms would remain in the Q744 building. In 2014-2015, after Civic Leadership, Pan American, Voyages, P752@Q744, and M.S. 311 have received the baseline allocation of full-size classrooms according to the Footprint, 8 excess full-size instructional rooms and 10 excess half-size classrooms would remain in the Q744 building.

If this proposal is approved, the Office of Space Planning would 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, including the need for counseling services, and the physical location of the excess space within the building. In addition, the Office of Space Planning would work with the schools in building Q744 to ensure a smooth transition, if necessary, of any rooms currently being used above schools' footprint allocations.

Comments 5(b, f), 9, 10 and 32 express concerns that current programs in the building will be affected by this temporary co-location.

The DOE does not anticipate that any of the current programs in the building will be affected by this temporary co-location. Each school would continue to offer special programs and initiatives, and extracurricular programs based on student interests, available resources, and staff support for those programs. However, the co-location may change the way those programs are configured. For example, some activities may need to share classroom space or the scheduling of these activities may change as a result of greater demands on the available space during or after school hours. Students would continue to have the opportunity to participate in a variety of extracurricular programs though the specific programs offered at a given school, which are always subject to change. That is true for any City student as all schools modify extracurricular offerings annually based on student demand and available resources.

At the close of the hearing, Principal Phuong Nguyen of Civic Leadership Academy assured the Civic Leadership Academy community that they will not lose their afterschool program or other programs, and that they will make sure students get the program they want regardless of what happens next year.

Chancellor's Designee, Queens High Schools Superintendent Juan Mendez, also clarified that the afterschool programs would not be impacted.

Comment 3(a) discusses reasons why the building Q744 is under-utilized and expresses that the principals had suggested proposals for use of the excess space.

Building space is scarce in many New York City neighborhoods. Given this reality and the growing enrollment needs of our 1.1 million students, we must use our existing public buildings in the most efficient manner possible. We must also work to ensure that students and families in every community have high-quality educational options.

Yearly, the DOE's Division of Portfolio Planning conducts a transparent process to publish a list of under-utilized buildings by applying consistent criteria to all school buildings across the city. Concurrent with the publication of the under-utilized list, Portfolio requests feedback from both the schools and community on building utilization information and potential changes.

In this case, there is an immediate need to alleviate overcrowding in the Corona and Elmhurst neighborhoods. As stated in the EIS, this proposal would help alleviate middle school overcrowding in Corona/Elmhurst in the coming year as well as plan for the efficient use of space when Q311 is completed so that Q311 can serve M.S. 311's full grade span. Q744 has adequate space to incubate a middle school for two years, the building is located less than half a mile from new construction Q311, and its facilities

include science labs appropriate for middle-school aged students. Given the aforementioned reasons and the need to provide middle school seats in the neighborhood, the DOE proposed to temporarily incubate the new school in Q744 for two years.

Comment 11 requests that the Building Council re-consider keeping the theater space in the basement.

The proposal put forth by the Building Council allocated music rooms and the theater room in the basement to the new school during its second year of incubation. The final shared space schedule has not yet been decided and will be decided upon by the Building Council in conjunction with the Office of Space Planning if this proposed co-location is approved by the PEP on December 20th at the High School of Fashion Industries.

Comment 22 contends that the DOE should listen to school communities.

The DOE provides multiple forums such as a dedicated phone line and email address, an online feedback form, and a Joint Public Hearing through which the community can express their concerns about a specific proposal. The DOE takes the community feedback into consideration and addresses all questions and concerns in a Public Comment Analysis that is posted on our website prior to the Panel for Educational Policy vote.

Comment 27 states that the DOE would have informed the parents of future students at M.S. 311 about this proposal if the DOE thought it was a good idea.

The DOE held an information session on October 17th, 2012 at P.S. 307 for families of elementary students residing in the incubation zone for the new school M.S. 311 in order to discuss the proposed new school M.S. 311 opening next September, the incubation zone lines, and the proposal to temporarily co-locate M.S. 311 in Q744 with two high schools, a District 75 program and a transfer school for two years before it moves to new construction. Approximately 50 people attended this information session. Questions were addressed concerning the safety of this co-location and whether there are metal detectors in Q744. Overall, parents were very supportive of adding middle school seats to this overcrowded area.

Comment 33(a) states that the Community Education Council of District 24 (“CEC 24”) was not given a plan to review in order to approve the co-location proposal.

The DOE informed the CEC 24 of the proposal to temporarily co-locate M.S. 311 in Elmhurst Educational Campus at their September 24th Calendar meeting. The DOE then posted the EIS on October 25th, 2012 on the Panel for Educational Policy’s website, in addition to mailing and emailing copies of the EIS to the CEC 24. The proposal can be found at the following link:

<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2012-2013/Dec2012Proposals.htm>. The EIS describes in detail the co-location proposal and the impact on schools and students in building Q744, including the space impact for schools in the building. It is not customary to develop a shared space plan prior to the approval of a proposal.

In regards to the concern about CEC approval of the proposal, proposals for significant changes in utilization are sent to the PEP and not the CEC for approval.



Comments 18, 21 and 33(d) voice general opposition to the proposal. The DOE believes that temporarily co-locating M.S. 311 in Q744 until it is re-sited to new construction will help alleviate middle school overcrowding in Corona/Elmhurst in September 2013, two years before new construction is available.

Changes Made to the Proposal

No changes have been made to this proposal.