

Public Comment Analysis

Date: November 25, 2013

Topic: The Proposed Re-Siting of One Grade Level of Richmond Hill High School (27Q475) to Building Q475 Beginning in the 2014-2015 School Year

Date of Panel Vote: November 26, 2013

Summary of Proposal

The New York City Department of Education (“DOE”) is proposing to re-site the ninth grade of Richmond Hill High School (27Q475, “Richmond Hill”) from its current location at building Q636 (“Q636”), located at 94-25 117th Street, Queens, NY 11418 in Community School District 27 (“District 27”), to building Q475 (“Q475”) and temporary classroom unit (“TCU”) Q944, located at 89-30 114th Street, Queens, NY 11418, in District 27 beginning in the 2014-2015 school year. Richmond Hill currently serves a portion of its ninth grade at building Q636, and currently serves the remainder of its ninth grade as well as its tenth through twelfth grades at building Q475. In addition, Q475 houses Partnership with Children, a community based organization (“CBO”). 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, Richmond Hill’s ninth grade in Q636 will be re-sited to Q475 beginning in the 2014-2015 school year. The DOE plans to open a new district high school in building Q636 in the 2014-2015 school year. The DOE anticipates that the new high school would have a limited unscreened admissions method, with priority to students residing in Queens. The new high school would open with ninth grade, adding one grade annually until it reaches full scale in the 2017-2018 school year in building Q636. At this time, the DOE does not plan to site any other school organizations in Q636. Beginning in the 2014-2015 school year, the new district high school would be the only school organization in Q636.

Currently, the DOE is planning to reduce the enrollment at Richmond Hill over a period of four years beginning in September 2014. By 2017-2018, enrollment at Richmond Hill will decrease by approximately 420-460 students so that it will serve approximately 1,580-1,620 students at scale in ninth through twelfth grades. The enrollment reduction is intended to provide an opportunity for Richmond Hill to concentrate on a smaller cohort of students, and allow for a new school option to develop in building Q636. If this proposal is not approved, the DOE will reassess its plans for the long term use of building Q636.

According to the 2012-2013 Enrollment Capacity Utilization Report (the “Blue Book”), building Q475 has the capacity to serve a total of 2,165 students. In 2013-2014, Richmond Hill is projected to serve approximately 1,784 ninth through twelfth-grade students in building Q475. This yields a projected utilization rate of approximately 82%. This means that the building is “under-utilized” and has space to accommodate additional students. If this proposal to re-site Richmond Hill’s ninth grade to Q475 is approved, in 2014-2015, Richmond Hill is projected to serve approximately 1,980 – 2,020 ninth through twelfth-grade students in Q475, yielding a projected building utilization rate of approximately 91% - 93%.

Background on the DOE’s Decision-Making Process

The DOE strives to ensure that all students in New York City have access to a high-quality school at every stage of their education. The opening of a new district high school in building Q636 is intended to provide an additional option to students and families in District 27 and in Queens at large. As mentioned above, the DOE is planning to gradually decrease Richmond Hill’s enrollment by approximately 420-460 students over a period of four years, which is intended to allow for a new school option to develop in building Q636.

The enrollment reduction of Richmond Hill is driven by Richmond Hill's performance and demand. Richmond Hill received an overall C grade on its Progress Report in 2011-2012, and received an overall D grade in 2010-2011 and an overall C grade in 2009-2010. Additionally, in 2011-2012, the school received a C grade in Student Progress and Career and College Readiness, and an F grade in Student Performance and Environment. Moreover, enrollment at Richmond Hill overall has decreased by 35% since 2008-2009, with a 33% decrease in ninth-grade enrollment from 1,173 ninth-grade students in 2008-2009 to 789 ninth-grade students in 2013-2014, indicating declining demand for the school. Applicant demand for Richmond Hill is low, particularly demand for the Choices Academy Program to which students apply as part of the High School Admissions Process. For the 2013-2014 school year, there were 1.4 applicants per seat available in this program, as compared to the Citywide average of 8.1 applicants per seat in high schools, with only 22% of all applicants to the program ranking it as their first choice.

At this time, the DOE believes that reducing the enrollment of Richmond Hill beginning in September 2014 and providing a new option for high school students in the Q636 building will benefit current and future students at Richmond Hill and in Queens. The enrollment reduction and re-siting is intended to provide an opportunity for Richmond Hill to concentrate on a smaller cohort of students in a consolidated location, and allow for a new school option to develop in building Q636.

The DOE believes that the District 27 community and Queens as a whole will benefit from having an additional option in the Q636 building.

The details of this proposal have been released in the EIS which can be accessed here:
<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2013-2014/Nov26SchoolProposals>.

Copies of the EIS are also available in the main office of Richmond Hill.

Summary of Comments Received

A joint public hearing regarding the proposal was held at Richmond Hill on November 14, 2013. At this hearing, interested parties had an opportunity to provide input on the proposal. Approximately 60 members of the public attended the hearing, and 13 people signed up to speak. Present at the meeting were Tamika Matheson, High School Superintendent for Districts 15, 22, 23, 27, 30, and 32; DOE representative Elaine Gorman; District 27 Community Education Council ("CEC 27") Member Michael Duvalle; Richmond Hill School Leadership Team ("SLT") representatives Principal Neil Ganesh, Vishnu Mahadeo, and Edith Rivera; Citywide Council on High Schools ("CCHS") Queens Representative Alleyne Hughley; Community Board 9 Member Seth Welins; and Jillian Roland and Dean Guzman from the DOE's Division of Portfolio Planning.

The following comments and remarks were made at the joint public hearing on November 14, 2013 on the proposal:

- 1) CCHS Queens Representative Alleyne Hughley had the following comments:
 - a) CCHS opposes this re-siting proposal.
 - b) She asked that the DOE postpone the re-siting until after the new administration has taken office.
 - c) She asked that the DOE give more time for the current Richmond Hill principal to improve the school.
 - d) She stated that Richmond Hill would lose more programs because of the re-siting.
 - e) She stated that the ninth grade annex is working well for the school culture.
- 2) CEC 27 member Michael Duvalle stated that CEC 27 does not get high school updates as they deal with kindergarten through eighth grade in the district.
- 3) Richmond Hill SLT member Vishnu Mahadeo had the following comments:
 - a) He expressed concern about the history of proposal for Richmond Hill stating that the DOE is proposing yet another change to the building.
 - b) He stated that the DOE did not take into account the rising demand for high school seats in Queens.
 - c) He believes the DOE did not accurately project the enrollment in the EIS.
 - d) He requested the DOE to amend the EIS so it reflects the true enrollment.
 - e) He believes this proposal will put students back into the TCUs on the main campus.

- f) He expressed concern that this proposal prevents Richmond Hill from using the playground because of the presence of the TCUs.
 - g) He expressed concern that the DOE is unaware of the partnership Richmond Hill has with the United States Tennis Association to build tennis courts on the main campus.
 - h) He stated that the DOE did not connect with Richmond Hill parents or the SLT to propose this change.
 - i) He stated that the DOE did not consult with any elected officials about this change.
 - j) He stated that according to the Borough President, the DOE does not have the authority to propose changes to Richmond Hill because of the new administration change.
 - k) He believes the DOE purposely decided to schedule the joint public hearing at the same time and date as the middle school fair.
 - l) He stated that Q636 was a solution to overcrowding at Q475.
 - m) He expressed that the DOE has ignored all input from the community.
 - n) He expressed concern over the difficulty of scheduling shared spaces and classes for students if the ninth grade is re-sited back to the main campus.
 - o) He believes the DOE should change their focus to making Richmond Hill a better place.
 - p) He believes the TCUs are not the best solution for alleviating overcrowding in the building.
 - q) He believes Queens needs more high schools but not at the expense of Richmond Hill.
- 4) Richmond Hill SLT member Edith Rivera had the following comments:
- a) She recognized that Richmond Hill has been failing.
 - b) She does not approve of the rationale behind this proposal.
 - c) She stated that removing Richmond Hill's usage of the annex will cause the main building to be overcrowded.
 - d) She believes that the DOE should put more programs in Richmond Hill.
 - e) She does not believe in opening the new high school in the annex because she believes students of District 27 should have priority to the high schools in District 27.
- 5) Community Board 9 member Seth Welins opposed the proposal and read the Community Board 9 resolution:
- a) Richmond Hill's use of Q636 for incoming ninth grade students relieves overcrowding at Q475.
 - b) Richmond Hill's use of Q636 would allow the removal of the TCUs at Q475 and allow for the space occupied by the TCUs to be used as a physical education facility.
 - c) Building Q636 provides the incoming ninth graders with a small, contained, and personalized learning environment which would help these students better adjust to high school life and offer a real chance of success for the students and the school.
 - d) The DOE did not consult with Richmond Hill staff, parents, students, or community members on this proposal.
 - e) If the proposal is approved, the TCUs will have to remain in the playground in order to accommodate the current and anticipated students who will enroll at the school.
 - f) Although the DOE states that in the EIS that it hopes to reduce overall enrollment at the main building and TCUs by 400 students by the 2017-18 school year, according to the DOE enrollment projections in the EIS, enrollments will actually increase in the 2014-15 and 2015-16 school years.
 - g) These TCUs are at least three years old and many of these structures were leaking, had mold, and constituted a serious health hazard for students and staff.
 - h) These TCUs are now repaired and up to code, but because of their age, do not constitute reliably safe and healthy environments for students or staff.
 - i) Community Board 9 urges the DOE to keep their promise to the Richmond Hill community to continue to site the school's ninth-grade students in the current annex: building Q636.
 - j) Community Board 9 urges the DOE to ensure that the total enrollment of Richmond Hill does not exceed 1,600 students, which is the projected enrollment in the re-siting proposal for the 2017-18 school year.
- 6) Multiple commenters opposed the proposal.
- 7) Multiple commenters expressed that the annex builds positive school culture.
- 8) Multiple commenters stated that the annex is a good location for incoming Richmond Hill ninth graders to start their high school careers.

- 9) Multiple commenters stated that Q475 will become overcrowded if the annex space is removed from Richmond Hill's use.
- 10) Multiple commenters expressed concern over the difficulty of scheduling shared spaces and classes for students if the ninth grade is re-sited back to the main campus.
- 11) Multiple commenters expressed that the main campus and classes at Richmond Hill are currently overcrowded.
- 12) Two commenters stated that resources will be taken away from Richmond Hill as a result of this proposal.
- 13) Two commenters expressed that the school utilization stated in the EIS is wrong because it includes the use of TCUs.
- 14) One commenter stated that the TCUs should be removed from the main campus.
- 15) One commenter questioned why the DOE has proposed so many changes to Richmond Hill.
- 16) One commenter stated that this proposal will not be approved because the new administration will postpone it.
- 17) One commenter expressed that this proposal will ruin school culture.
- 18) One commenter expressed that overcrowded buildings require floating teachers, which is detrimental to the learning environment.
- 19) One commenter stated that Richmond Hill has many successful existing programs.
- 20) One commenter expressed concern that the DOE will take away programs if this proposal approved.

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

There were two written comments submitted to the DOE regarding this proposal.

- 21) Community Board 9 member Seth Welins had the following questions:
 - a) He asked if the TCUs located at Q475 would continue to be utilized as classrooms.
 - b) He asked if the TCUs will be replaced with new units.
 - c) He believed that the purpose of building the current annex to Richmond Hill was to relieve overcrowding and eliminate the need for TCUs on the main campus.
 - d) He asked what the utilization rate of Q475 will be if the re-siting occurs and if the TCUs are removed.
 - e) He asked how the enrollment reduction will be accomplished.
 - f) He states that the population in Queens is expanding and the DOE should anticipate an increase in student enrollment in Queens.
 - g) He asked what type of school will be sited in Q636.
 - h) He asked if the DOE will provide funds for repairs and renovations in Q475.
- 22) One commenter expressed opposition to the proposal.
- 23) One commenter expressed that the DOE should re-site the ninth grade once the TCUs are fully removed from the main campus.
- 24) One commenter believes the utilization and capacity of Q475 is not accurate because it includes the TCUs.
- 25) One commenter believes the DOE deliberately withdrew resources and academic support in an attempt to phase out the school in 2011.

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

Comment 2 is unrelated to the proposal and thus does not require a response.

Comments 1a, 4b, 5i, 6, and 22 express general opposition to this re-siting proposal.

As stated in the EIS, the DOE strives to ensure that all students in New York City have access to a high-quality school at every stage of their education. The opening of a new district high school in building Q636 is intended to provide an additional option to students and families in District 27 and in Queens at large. The DOE is planning to gradually decrease Richmond Hill's enrollment by approximately 420-460 students over a period of four years, which is intended to allow for a new school option to develop in building Q636.

At this time, the DOE believes that reducing the enrollment of Richmond Hill beginning in September 2014 and providing a new option for high school students in the Q636 building will benefit current and future students at Richmond Hill and in Queens. The enrollment reduction and re-siting is intended to provide an opportunity for Richmond Hill to concentrate on a smaller cohort of students in a consolidated location, and allow for a new school option to develop in building Q636.

The DOE believes that the District 27 community and Queens as a whole will benefit from having an additional option in the Q636 building.

Comments 1b, 3j, and 16 express concern about the timing of this proposal and the fact that it would be implemented under a new Mayor.

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

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

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

Forward planning allots more time for:

- School/leaders to meet each other; and
- The Office of Space Planning ("OSP") to plan school placement and implement any needed facilities upgrades; and
- Charters to submit proposals for facilities matching; and
- Division of Facilities to review and conduct work on approved proposals.

Comments 3h, 3i, 3m, and 5d express concern about the DOE's engagement with the Richmond Hill community. Comment 3k expresses concern about the scheduling of the joint public hearing.

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

Several months prior to the issuance of the EIS describing this proposal, representatives from the Office of Portfolio Management spoke with Richmond Hill's Principal and Network Leader, and the Community School District 27 and Queens High Schools Superintendents, about the potential proposed re-siting.

Consistent with applicable laws and regulations, the EIS was published on the DOE's website on October 11, 2013, and hard copies were made available in the Richmond Hill main office. When an EIS is issued, it is made available to the staff, faculty and parents at all the impacted schools, on the DOE's Web site, and in each school's respective main office. Parents were notified of the proposal and the joint public hearing via English parent letters and joint public hearing notices that were backpacked home with students by October 17, 2013. Spanish parent letters were made available by October 30, 2013. The DOE dedicated a proposal-specific website, voicemail and email address to collect feedback on this proposal.

Further, the DOE encourages all families and community members to participate in these processes. Throughout the course of the next year, the DOE and the Queens High School Superintendent are committed to working cooperatively with the Citywide Council for High Schools as well as the District 27 CEC to gather more feedback

concerning the establishment of the new high school in Q636. Specifically, representatives from the Office of New Schools attended the District 29 CEC's November Calendar Meeting on November 18, 2013 to present information about the new school leader selection process, and to gather feedback from the community regarding the school leader and model.

In regards to comment 3k, the DOE reached out to CEC 27 and the impacted SLTs in advance of issuing the EIS to schedule the joint public hearing. The District 27 High School Superintendent, CEC 27, and Richmond Hill SLT were all given four possible dates to select for the joint public hearing, and all mandated parties agreed to the November 14th date for the joint public hearing.

Comment 19 expresses support for Richmond Hill's diverse programming.

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

Comments 1e, 5c, 7, and 8 express that Richmond Hill's use of Q636 has improved school culture and that Q636 has created a welcoming environment for incoming ninth grade students.

The DOE believes in giving principals autonomy to program and direct their schools as they see fit and recognizes the efforts made by the current school leadership to improve the learning environment at Q475 and Q636. Queens high schools, and many high schools throughout the city, have successfully served students in one building. The enrollment reduction and re-siting is intended to provide an opportunity for Richmond Hill to concentrate on a smaller cohort of students in a consolidated location. As described in the EIS, if this proposal is approved, there will be sufficient space to serve all Richmond Hill students in Q475 pursuant to the Citywide Instructional Footprint (the "Footprint") while Richmond Hill undergoes its enrollment reduction.

During this re-siting, Richmond Hill, like all DOE schools, will continue to receive support and assistance from its superintendent and Children First Network, a team that delivers operational and instructional support directly to schools. The DOE does not anticipate that this proposal will preclude the current leader from improving the learning environment at Richmond Hill.

Comments 1d, 3g, 4d, and 20 express concerns about the impact of this proposal on Richmond Hill's programming and partnerships.

As mentioned in the EIS, as total enrollment at Richmond Hill declines throughout the course of the enrollment reduction, the school may need to scale back its elective course offerings. It is difficult to predict how those changes might be implemented, as decisions will rest with school administrators and will be based on student demand and available resources. However, the school will still have 1,580 – 1,620 students by the end of the enrollment reduction, and this is a sufficient size to continue offering a wide array of academic and extra-curricular offerings.

Additionally, the DOE does not anticipate that this proposal will affect the extra-curricular programs or partnerships currently offered at Richmond Hill. The school will still have 1,580 – 1,620 students by the end of the enrollment reduction, and this is a sufficient size to continue offering a wide array of extra-curricular offerings. Richmond Hill will continue offering student athletics and other extra-curricular programs options, but the number and range of programs offered may change due to declining student enrollment as a result of the enrollment reduction.

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

Comment 12 expresses concern that resources will be taken away from Richmond Hill as a result of this proposal.

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

As a result of the enrollment reduction, the total number of students enrolled at Richmond Hill will decline each year, meaning that the school's budget would decrease each year, and the school would need fewer teachers and fewer supplies to meet the needs of its smaller student population. If the overall school enrollment grows again, the overall budget would increase accordingly. In any case, funding will be provided in accordance with enrollment levels, allowing the school to meet the instructional needs of its student population. This is how funding is awarded to all schools throughout the City, with budgets increasing or decreasing as enrollment fluctuates from year to year. Regardless of enrollment shifts, students will be able to take the necessary courses staffed with appropriately licensed teachers to satisfy their graduation requirements. Most funding in schools' budgets is allocated on a per pupil basis, based on current by the FSF per capita allocation levels. Schools receive additional funds for students with disabilities, ELLs, and those with other supplemental academic needs.

Please refer to the FSF Guide and FY14 School Allocation Memoranda for additional information on cost of instruction and how the changes to FSF funding and other school allocations will be impacted as a result of register changes at Richmond Hill. Staffing changes are at the discretion of the school within the limits of contractual and mandated obligations.

Comments 3a, 4a, 15 and 25 concern the history and impact of prior interventions at Richmond Hill.

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

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

The enrollment reduction of Richmond Hill is driven by Richmond Hill's performance and demand. Richmond Hill received an overall C grade on its Progress Report in 2011-2012, and received an overall D grade in 2010-2011 and an overall C grade in 2009-2010. Additionally, in 2011-2012, the school received a C grade in Student Progress and Career and College Readiness, and an F grade in Student Performance and Environment. Moreover, enrollment at Richmond Hill overall has decreased by 35% since 2008-2009, with a 33% decrease in ninth-grade enrollment from 1,173 ninth-grade students in 2008-2009 to 789 ninth-grade students in 2013-2014, indicating declining demand for the school. Applicant demand for Richmond Hill is low, particularly demand for the Choices Academy Program to which students apply as part of the High School Admissions Process. For the 2013-2014 school year, there were 1.4 applicants per seat available in this program, as compared to the Citywide average of 8.1 applicants per seat in high schools, with only 22% of all applicants to the program ranking it as their first choice.

At this time, the DOE believes that reducing the enrollment of Richmond Hill beginning in September 2014 and providing a new option for high school students in the Q636 building will benefit current and future students at Richmond Hill and in Queens. The enrollment reduction and re-siting is intended to provide an opportunity for

Richmond Hill to concentrate on a smaller cohort of students in a consolidated location, and allow for a new school option to develop in building Q636.

As stated in the EIS, this proposal is for re-siting of one grade level of Richmond Hill to Q475 beginning in the 2014-2015 School Year. Any future significant changes to school utilization in the Q475 main building would be proposed in a separate EIS and subject to separate approval by the Panel for Educational Policy (“PEP”) in accordance with Chancellor’s Regulation A-190.

Comment 11 expresses concerns about overcrowding in the Q475 building. Comments 3l, 4c, 5a, 9, and 21c specifically express concerns about the impact on utilization in the Q475 building once the ninth grade has been re-sited.

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

As described in the EIS, if this proposal is approved, there will be sufficient space to serve all Richmond Hill students in Q475 pursuant to the Citywide Instructional Footprint (the “Footprint”) while Richmond Hill undergoes its enrollment reduction. As stated in the EIS, the utilization rates of building Q475 will continue to be below 100% capacity after the ninth grade is re-sited back to the main campus and throughout the period that Richmond Hill reduces enrollment. In 2014-2015, the total projected enrollment for Q475 is approximately 1,980 – 2,020 and the projected target building utilization rate for Q475 will be approximately 91% - 93%. By 2017-2018, Richmond Hill will have completed its enrollment reduction. At that point, the total projected enrollment for Q475 is approximately 1,580 – 1,620 and the projected target building utilization rate for Q475 will be approximately 73% - 75%. At scale in 2017-2018, the DOE anticipates Richmond Hill will use 54 full-size rooms, 9 half-size rooms, and 8.5 FSE of administrative space in the main building, and 5 full-size rooms in TCU Q944. In addition, there will be 14 half-size rooms and 4.0 FSE of administrative space in excess in the main building. At scale, the DOE anticipates Richmond Hill will be less reliant on TCU Q944 than it has been in prior years. In addition, the school will have excess half-size and designed administrative space available for use in the main building.

Comments 1c and 3o specifically ask that the DOE give Richmond Hill time and resources to improve.

As mentioned in the EIS, at this time, the DOE believes that reducing the enrollment of Richmond Hill beginning in September 2014 will benefit current and future students at Richmond Hill. The enrollment reduction is intended to provide an opportunity for Richmond Hill to concentrate on a smaller cohort of students, and allow for a new school option to develop in building Q475.

During this re-siting, Richmond Hill, like all DOE schools, will receive support and assistance from its superintendent and Children First Network, a team that delivers operational and instructional support directly to schools. The DOE does not anticipate that this proposal will preclude the new leader from improving the learning environment at Richmond Hill.

Comment 3c contends that the utilization and enrollment data provided in the EIS are incorrect. Comment 3d specifically requests the DOE to amend the EIS so it reflects the current enrollment.

The EIS included 2013-2014 Budget Register Projections (as do all proposals published before October 31st), which are the most reliable indicator of expected enrollment. While school registers may differ from projections during the start of the school year, the DOE notes that registers often fluctuate daily through October 31st, when the unaudited register becomes available.

Comments 13 and 24 express that the school utilization stated in the EIS is wrong because it includes the use of TCUs. Comments 3e, 3p, and 21a relate to the general usage of TCUs by Richmond Hill. Comments 14 and 23 express that the TCUs on the main campus should be removed. Comments 3f, 5b, and 5e state that the TCUs should be removed for playground use. Comment 21d asks what the utilization rate of Q475 will be if the re-siting occurs and if the TCUs are removed.

Richmond Hill utilized both the main building and the TCUs during the 2013-14 school year. The enrollment, capacity and utilization reflected the actual usage by the school of both the main building and the TCUs.

The utilization projections in the EIS are based on maintaining the current number of TCUs and the current use of all rooms in both the main building and the TCUs. However, as stated in the EIS, the projected target building utilization rate for Q475 will be approximately 73% - 75% and therefore the DOE anticipates Richmond Hill to be less reliant on the TCUs than it has been in prior years. Changes to the way rooms are used have the potential to change the capacity calculation. It is not possible to calculate the target capacity if the TCUs are removed because we cannot determine how the usage of rooms might change as enrollment changes.

As many high schools do, Richmond Hill can choose to program in a manner that enables them to rely less heavily on usage of TCUs. Queens high schools, and many high schools throughout the city, have successfully served students in buildings by efficiently scheduling classes through additional periods and split-schedules. Some examples include Forest Hills High School and Francis Lewis High School in Queens, which each operate on more than one session and have received "A" and "B" progress report grades every year, with each receiving an "A" grade for the 2010-2011 and 2011-2012 school years. As TCUs are freed up, the DOE would consider removing the TCUs.

Comments 5g and 5h relate to the condition of the TCUs at the main campus. Comment 21b asks if the TCUs will be replaced with new units.

As stated in the EIS, from September 20, 2013 to October 2, 2013, mold remediation and cleaning for TCU Q944 was conducted. All units in TCU Q944 were suitable for occupancy at the time of the completion of the mold remediation and cleaning on October 2, 2013.

In regards to comment 21b, the DOE assesses the condition of TCUs annually and addresses condition issues as they arise. The FY2015-2019 Capital Plan does not plan for replacement of TCUs. However, the DOE has replaced TCUs in cases where they are required to serve a school's enrollment and conditions of existing TCUs are not safe for students and staff.

Comment 5f expresses concern over the increase in enrollment in Q475 in the 2014 – 2015 and 2015 – 2016 despite the DOE's hopes to reduce overall enrollment at the main building and TCUs by the 2017 – 2018 school year.

Because the students in Q636 will be re-sited back to Q475 in 2014 – 2015, the number of students in Q475 is projected to temporarily increase for the 2014 – 2015 and 2015 – 2016 school years. As stated in the EIS, the DOE is planning to gradually decrease the school's enrollment by approximately 420-460 students over a period of four years beginning in 2014 - 2015. By 2016 – 2017, there will be a lesser number of students enrolled at Richmond Hill than at present.

Comment 5j and 21e relate to how the enrollment reduction will be implemented.

As stated in the EIS, the DOE is planning to gradually decrease the school's enrollment by approximately 420-460 students over a period of four years. The enrollment reduction will reduce the number of seats offered in the ninth grade beginning for the 2014-2015 school year. This reduction is intended to provide an opportunity for Richmond Hill to concentrate on a smaller cohort of students, and allow for a new school option to develop in building Q636.

Comment 4e and 21g concern the model and admissions method of the new high school in Q636

The DOE plans to open a new district high school in building Q636 in the 2014-2015 school year. The DOE anticipates that the new high school would have a limited unscreened admissions method, with priority to students residing in Queens. The new high school would open with ninth grade, adding one grade annually until it reaches full scale in the 2017-2018 school year in building Q636.

Comments 3n and 10 concern the logistics of housing all students in grades 9-12 in the main building.

Because the students in Q636 will be re-sited back to Q475 in 2014 – 2015 and 2015 - 2016, the number of students in Q475 is projected to temporarily increase for the 2014 – 2015 school year. Queens high schools, and many high schools throughout the city, have successfully served students in buildings by efficiently scheduling classes through additional periods and split-schedules. Some examples include Forest Hills High School and Francis Lewis High School in Queens, which each operate on more than one session and have received “A” and “B” progress report grades every year, with each receiving an “A” grade for the 2010-2011 and 2011-2012 school years. As many high schools do, Richmond Hill can choose to program in a manner that enables them to rely less heavily on usage of TCUs. As TCUs are freed up as a result of the enrollment reduction at Richmond Hill, the DOE would consider removing the TCUs.

However, as stated earlier, the utilization rates of building Q475 will continue to be below 100% capacity after the ninth grade is re-sited back to the main campus and throughout the period that Richmond Hill reduces enrollment. In 2014-2015, the total projected enrollment for Q475 is approximately 1,980 – 2,020 and the projected target building utilization rate for Q475 will be approximately 91% - 93%. By 2017-2018, Richmond Hill will have completed its enrollment reduction. At that point, the total projected enrollment for Q475 is approximately 1,580 – 1,620 and the projected target building utilization rate for Q475 will be approximately 73% - 75%. At scale in 2017-2018, the DOE anticipates Richmond Hill will use 54 full-size rooms, 9 half-size rooms, and 8.5 FSE of administrative space in the main building, and 5 full-size rooms in TCU Q944. In addition, there will be 14 half-size rooms and 4.0 FSE of administrative space in excess in the main building. At scale, the DOE anticipates Richmond Hill will be less reliant on TCU Q944 than it has been in prior years. In addition, the school will have excess half-size and designed administrative space available for use in the main building.

Comment 17 and 18 express concern about the impact of this proposal on school culture.

The DOE has confidence in the abilities of Richmond Hill to create strong cultures supportive of student progress and high quality performance. As mentioned above, during this re-siting, Richmond Hill, like all DOE schools, will receive support and assistance from its superintendent and Children First Network, a team that delivers operational and instructional support directly to schools. The DOE does not anticipate that this proposal will preclude the new leader from improving the learning environment or culture at Richmond Hill.

In regards to comment 18, the DOE will continue to support the education students receive at Richmond Hill. All schools receive support and assistance from their superintendent and Children First Network, a team that delivers operational and instructional support directly to schools. At scale in 2017 – 2018, the total projected enrollment for Q475 is approximately 1,580 – 1,620 and the projected target building utilization rate for Q475 will be approximately 73% - 75%.

Comments 3b, 3q, and 21f relate to the rising need for high school seats in Queens.

The DOE recognizes the need for additional seats in Queens. As mentioned above, the opening of a new district high school in building Q636 is intended to provide an additional option to students and families in District 27 and in Queens at large. The DOE is planning to gradually decrease Richmond Hill’s enrollment by approximately 420-460 students over a period of four years, which is intended to allow for a new school option to develop in building Q636 and increase the number of options for students and families in District 27 and Queens at large.

The FY2015-2019 Capital Plan was released in November, 2013 and identified a need for 5,604 high school seats in Queens. The School Construction Authority (“SCA”) in conjunction with the DOE will be happy to evaluate potential sites for high schools in Queens.

Comment 21h asks if the DOE will provide funds for repairs and renovations to Q475.

Building repairs are performed by the Division of School Facilities. As issues arise they are prioritized and addressed either by the custodian or by the DOE’s in-house skilled trade workmen. Renovations are funded and



executed through the Capital Plan. The current FY 2010-2014 Five Year Capital Plan funded over \$13 million in capital improvement projects in Q475, including science lab upgrades, exterior masonry, windows and roofing projects, telephone/intercom system, internet connectivity, and security camera projects. The proposed FY2015-2019 Capital Plan has not identified capital improvement projects in Q475 in the first two years of the plan. However, the plan is updated annually, so there may be projects identified for Q475 in the future.

The current FY 2010-2014 Five Year Capital Plan and FY2015-2019 Capital Plan are available at:
<http://www.nycsca.org/Community/CapitalPlanManagementReportsData/Pages/CapitalPlan.aspx>

Changes Made to the Proposal

No changes have been made to the proposal.