



**Public Comment Analysis**

Date: January 15, 2013

Topic: The Proposed Temporary Siting and Co-location of New School 15K516<sup>1</sup> with Existing Schools I.S. 136 Charles O. Dewey (15K136) and Sunset Park Preparatory (15K821) in Building K136 for the 2013-2014 School Year

Date of Panel Vote: January 16, 2013

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**Summary of Proposal**

In an Educational Impact Statement (“EIS”) posted on November 29, 2012, the New York City Department of Education (“DOE”) proposed to site and co-locate one grade of New School 15K516 (“15K516”), a new unzoned elementary school that will serve kindergarten through fifth grade when it reaches full scale, in building K136 (“K136”), located at 4004 4th Avenue, Brooklyn, NY 11232, in Community School District 15 (“District 15”), for the 2013-2014 school year. 15K516 would be co-located with I.S. 136 Charles O. Dewey (15K136, “I.S. 136”), an existing screened middle school that serves sixth through eighth grades, and Sunset Park Preparatory (15K821, “Sunset Park Prep”), an existing screened middle school that serves sixth through eighth 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. K136 also houses one community-based organization, The Center for Family Life, which provides programming during the school day and after school to I.S. 136 and Sunset Park Prep.

15K516 is a new unzoned elementary school that will open in September 2013, and, during the 2013-2014 school year, will serve kindergarten students who are overflowed from their zoned schools in the Sunset Park neighborhood. The K136 building will be used to incubate 15K516 until 2014-2015, when the school can be re-sited to its long term location, building K333 (“K333”). K333 is a leased space that is currently undergoing upgrade and renovation in preparation for long-term DOE occupancy. K333 is located at 4222 4th Avenue, Brooklyn, NY 11232, approximately 0.1 miles away from K136.

Due to overcrowding in the Sunset Park area of District 15, many zoned schools have found it necessary to divert incoming kindergarten students and offer them an alternative placement at other schools within the district. As a result of this overcrowding, in June 2012 there were 115 waitlisted kindergarten students in Sunset Park.

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<sup>1</sup> The New School was referred to as 15KTBD in the EIS.

If this proposal to site and co-locate 15K516 with I.S. 136 and Sunset Park Prep is approved, 15K516 will open in 2013-2014 to serve kindergarten students in K136. The DOE intends to re-site 15K516 to its long term location, K333, within District 15 in the 2014-2015 school year. The school will serve kindergarten and first grade in K333 during the 2014-2015 school year, and will continue to add an additional grade each year until 2018-2019, when it reaches full scale and serves kindergarten through fifth grade in K333. If re-siting 15K516 to K333 is not feasible for any reason, the DOE will re-assess the space at K136 and, if appropriate, may 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 15K516.

According to the 2011-2012 Enrollment Capacity Utilization Report (the “Blue Book”), K136 has the capacity to serve 1,211 students. In 2012-2013, I.S. 136 has an enrollment of 451 students and Sunset Park Prep has an enrollment of 515 students, for a total of 966 students in K136. This yields a building utilization rate of approximately 80%. This means that the building is “underutilized” and has space to accommodate additional students. In 2013-2014, I.S. 136 is projected to serve 400-430 students, Sunset Park Prep is projected to serve 515-545, and 15K516 is projected to serve 65-75 students, yielding an estimated utilization rate of 81% - 87%. If this proposal is approved, there will be sufficient space in K136 to accommodate 15K516 as well as I.S. 136 and Sunset Park Prep.

The details of this proposal have been released in an EIS which can be accessed here: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2012-2013/Jan2013Proposals.htm>  
Copies of the EIS are also available in the main offices of I.S. 136 and Sunset Park Prep.

### **Summary of Comments Received at the Joint Public Hearings**

A joint public hearing regarding the proposal was held at K136 on January 9, 2013. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 25 members of the public attended the hearing, and one person spoke. Present at the meeting were District 15 Superintendent Anita Skop; District 15 Community Education Council (“CEC 15”) President Jim Devor and members Mike Kolman, Janet Williams, and Rachel Porter; I.S. 136 Principal Eric Sackler; Sunset Park Prep Principal Lola Padin; I.S. 136 SLT member; Sunset Park Prep SLT Member Myrna Pinos; and Savita Iyengar from the Department of Education.

The following comments and remarks were made at the joint public hearing on January 9, 2013:

1. Principal Padin stated that there needs to be a partnership between the schools, and she has concerns regarding safety:
  - a. She wants to avoid co-mingling between different age groups.
  - b. She believes that lunch should be delivered to the classrooms instead of the new school sharing cafeteria space.
2. Principal Sackler stated that lunch for the new school will need to be served in the students’ classrooms because there is no space to share in the cafeteria.

3. Principal Sackler stated that the projected enrollment numbers for I.S. 136 in the EIS were based on the rumor that the school was closing, so the 2013-2014 projections are not correct.
4. Jim Devor, CEC President, stated:
  - a. He has generally been skeptical of co-locations, but is in support of this one for the limited use of one year.
  - b. The greatest need in Sunset Park is pre-kindergarten spots, but this was not offered.
5. Community member stated:
  - a. She wanted to know the percentage of completion on the St. Michael's (K333) construction project.
  - b. She has concerns about safety and asked that staggered arrival and dismissal times be considered
  - c. She is concerned about the safety of a co-location of kindergarteners with adolescents, and thinks that the schools should prevent co-mingling between the different age groups.
  - d. She is concerned about sharing cafeteria space.
  - e. It is good news to hear that there will be seats, but it is disappointing that there will be no pre-kindergarten.

**The DOE received a number of comments at the joint public hearing which do not directly relate to the proposal and therefore, will not be addressed. Those comments are summarized below.**

1. Jim Devor, CEC 15 President stated:
  - a. P.S. 133 is moving to its new building and will have an admissions methodology that gives priority to ELL students. CEC 15 urges parents to seriously consider the availability of P.S.133, which already has a Dual Language program geared towards Mandarin education.
2. Rachel Porter, CEC 15 member, stated:
  - a. CEC 15 urges families to consider P.S. 133.
3. Community member stated:
  - a. Many Sunset Park parents are concerned about bussing because children are being physically abused on the buses. We need a forum for parents to have an open dialogue about what is happening.

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

No written or oral comments were received regarding this proposal.

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

Comment 4 (a) is in favor of the proposal and does not require a response.

Comments 1 (a) and 5(c) concern the varying grade levels as a result of co-location.

Due to space limitations, it is not unusual for varying grade levels to be co-located together. There are several 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.

Comment 3 expresses concern regarding the enrollment projections for I.S. 136.

The DOE acknowledges that sixth grade enrollment in 2012-2013 is lower than in prior years. The EIS projections for 2013-2014 are based on the current enrollment of sixth grade and assume that the same number will age up and that there is stable incoming enrollment at the entry point. This is a standard methodology used to project enrollment across proposals.

Comment 5 (d) concerns the need for pre-kindergarten seats in Sunset Park.

The need for additional elementary school seat capacity is extreme in this part of District 15, and priority must be given to accommodating students at their zoned schools whenever possible. Due to overcrowding in the Sunset Park area of District 15, many zoned elementary schools have found it necessary to divert incoming kindergarten through fifth grade students and offer them an alternative placement at other schools within the district. District 15 elementary schools are over capacity, with an average utilization rate for K-5 schools of 114%. This number is higher in the Sunset Park area where the average utilization rate for K-5 schools is 126%, with a range of 95%-144%.

As a result of this overcrowding, in 2012, there were 115 waitlisted kindergarten students in Sunset Park. The DOE explored various ways to accommodate all of the waitlisted children, including attempting to identify underutilized public school buildings in the area, searching for suitable school-ready private space to lease, reducing pre-kindergarten at local elementary schools, and determining if there were any available classrooms in existing district schools.

The proposed siting and co-location of this new school is intended to alleviate overcrowding in District 15. In the 2013-2014 school year, 15K516 will serve as an overflow site for schools in the Sunset Park area, which will reduce the number of students that need to be overflowed to schools outside of the Sunset Park area this coming fall. Starting in 2014-2015, pending the submission of a rezoning proposal and its approval by the CEC, 15K516 will admit students from a zone, which will promote more stable enrollment patterns in the Sunset Park vicinity.

Comments 1 (b), 2 and 4(d) concern the the sharing of cafeteria space.

If this proposal is approved, 15K516's students will be served in building K136 for the 2013-2014 school year. As in other situations where schools are co-located, beginning in the 2013-2014 school year, 15K516, I.S. 136, and Sunset Park Prep will share the gymnasium, auditorium, cafeteria and library. Specific decisions regarding the allocation of the shared spaces will be made by the Building Council, consisting of principals from all co-located schools, in conjunction with the DOE Office of Space Planning.

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>.

Comment 5(a) concerns the progress of the St. Michael's construction project.

As stated in the EIS, the K136 building will be used to incubate 15K516 until 2014-2015, when the school can be re-sited to its long term location, building K333, also known as St. Michael's. K333 is a leased space that is currently undergoing upgrade and renovation in preparation for long-term DOE occupancy. K333 is located at 4222 4<sup>th</sup> Avenue, Brooklyn, NY 11232, approximately 0.1 miles away from K136. The School Construction Authority is overseeing the upgrade and renovation, and the DOE anticipates that the building will be ready for occupancy by 15K516 by September 2014. If re-siting 15K615 to K333 is not feasible for any reason, the DOE will re-assess the space at K136 and, if appropriate, may extend the co-location, or propose an alternative siting plan. The DOE would issue a separate EIS describing any alternate plan for 15K615.

Comment 5(b) requests staggered arrival and dismissal times between the middle schools and the new elementary school.

15K516 students will be housed in the transportable classroom units ("TCUs") located adjacent to K136. Therefore, the entrance for 15K516 students will be separate from the entrance for the students in the main building. In any event, arrival and dismissal times are decided by the principal and Building Council.

Additionally, Pursuant to Chancellor's Regulation A-414, every school/campus is mandated to form a School Safety Committee, which is responsible for developing a comprehensive School Safety Plan that defines the normal operations of the site and what procedures are in place in the event of an emergency. The School Safety Plan is updated annually by the Committee to meet the changing security needs, changes in organization and building conditions and any other

factors; these updates could also be made at any other time when it is necessary to address security concerns. The Committee will also address safety matters on an ongoing basis and make appropriate recommendations to the Principal(s) when it identifies the need for additional security measures.

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

No changes have been made to this proposal.