



Public Comment Analysis

Date: April 16, 2013

Topic: The Proposed Temporary Re-siting and Co-location of a Portion of the Kindergarten of P.S. 143 Louis Armstrong (24Q143) with P.S. 330 (24Q330) in New Building Q287 for the 2013-2014 School Year

Date of Panel Vote: April 17, 2013

Summary of Proposal

The New York City Department of Education (“DOE”) is proposing to temporarily “re-site” and “co-locate” a portion of the incoming kindergarten grade of P.S. 143 Louis Armstrong (24Q143, “P.S.143”) in new building Q287 (“Q287”)with P.S. 330 (24Q330, “P.S. 330”) for the 2013-2014 school year. P.S. 143 is an existing zoned elementary school that currently serves students in kindergarten through fifth grades in buildings Q143 (“Q143”), mini building Q843 (“Q843”), and Transportable Classroom Unit (“TCU”) Q937¹ at 34-74 113th Street in Queens, NY 11368, within the geographical confines of Community School District 24 (“District 24”). A portion of P.S. 143’s kindergarten and first grade is also currently located in leased building Q908 (“Transfiguration Annex”), which is located at 98-07 38th Avenue, Queens, NY 11368, also within the geographical confines of District 24. P.S. 330 currently serves students in kindergarten through second grades in building Q269 (“Q269”) located at 86-37 53rd Avenue in Queens, NY 11373, also within the geographical confines of District 24. In a separate proposal, P.S. 330 was approved to be “re-sited” to its permanent location, new building Q287 located at 111-08 Northern Boulevard in Queens, NY 11368, also within the geographical confines of District 24 beginning in the 2013-2014 school year. A “re-siting” means students will attend classes in a different building than the one they have attended in previous years. 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.

¹ All references to Q143 include buildings Q143, Q937, and Q843, and not the Transfiguration Annex.

On June 26, 2012, the Panel for Educational Policy (“PEP”) approved the re-siting² of P.S. 330 to new building Q287, and on June 26, 2012, Community Education Council 24 (“CEC 24”) voted³ to change the current zone for P.S. 143 and create a new zone for P.S. 330 when it moves into its long-term location in Q287. Beginning in 2013-2014, P.S. 330’s kindergarten through second grades will be re-sited from building Q269, where they are currently located, to building Q287, a new building that is expected to become available for use by September 2013. P.S. 330 will serve students in kindergarten through third grades in new building Q287 during the 2013-2014 school year.

The lease for the Transfiguration Annex will expire at the end of the 2012-2013 school year and a renewal on the lease has not been made available to the School Construction Authority (“SCA”). This proposed re-siting of a portion of the incoming kindergarten of P.S. 143 to building Q287 is intended to recover a large portion of the kindergarten seats that will be lost due to the expiration of the lease for the Transfiguration Annex and to accommodate the continued growth in incoming kindergarten students in the community for the 2013-2014 school year.

Several elementary schools in the Corona neighborhood of District 24 in Queens currently enroll more students than their target capacity levels. P.S. 143, in particular, is already very overcrowded, and it will no longer be able to use the Transfiguration Annex at the end of the 2012-2013 school year. Where possible, the DOE aims to utilize available space in other local school buildings to alleviate overcrowding.

If this proposal is not implemented, building Q287 is expected to be underutilized in the 2013-2014 school year because P.S. 330 will not yet be at full scale, and will only serve kindergarten through third grades in the 2013-2014 school year. P.S. 330 is phasing in one grade at a time and will serve students in Kindergarten through fifth grades at scale. Building Q287 has the space to accommodate P.S. 330 at full scale. Therefore, building Q287 has the space to accommodate a portion of the kindergarten of P.S. 143 for one year prior to P.S. 330 reaching full scale, and presents the opportunity to temporarily relieve overcrowding at P.S. 143 for the 2013-2014 school year. The DOE believes that this proposal is the best available solution for the 2013-2014 school year. Solutions to alleviate overcrowding at P.S. 143 beyond the 2013-2014 school year are not within the scope of this proposal. A more detailed discussion of long-term planning for the Corona neighborhood, including P.S. 143, is detailed below in Section III.C.

² More information about the PEP vote can be found here:

<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/June2012Proposals.htm>.

³ The description of zone changes for P.S. 143 and P.S. 330 at new building Q287 can be found here:

http://schools.nyc.gov/NR/rdonlyres/301E4A36-CC83-4147-A921-8B6DB6B3F9C4/0/D24_Q330_Rezoning_Description_OnePager_06262012.pdf.

According to the SCA, new building Q287 has the target capacity to serve a total of 420 students.⁴ If this proposal is approved, the projected enrollment in 2013-2014 of P.S. 143 at Q287 will be approximately 140-150 kindergarten students⁵ and the projected enrollment of P.S. 330 will be approximately 330-370 kindergarten through third grade students.⁶ This will result in a total projected building enrollment of 470-520 students, yielding a building utilization rate of 112% - 124%.⁷ Although a utilization rate in excess of 100% may suggest that a building will be over-utilized or over-crowded in a given year, this rate does not account for the fact that rooms may be programmed for more efficient or different uses than the standard assumptions in the utilization calculation, as described above.

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/April2013Proposals.htm>.

Copies of the EIS are also available in the main offices of P.S.143 and P.S. 330.

Summary of Comments Received

A joint public hearing regarding the proposal was held at P.S. 330 on April 8, 2013. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 35 members of the public attended the hearing and 5 people spoke. Present at the meeting were District 24 Community Superintendent Madelene Chan; District 24 Community Education Council ("CEC 24") Member Connie Partinico; Lashawna Harris, Principal of P.S. 330; Carri To representing the P.S. 330 School Leadership Team; Katie Boyajien, Sulay Tapia, and Angelica Salgado representing the P.S. 143 School Leadership Team; Joel Trinidad Santos, representative of Councilmember Ferreras; and Emily Ades and Allen Miller from the Office of Portfolio Management.

⁴ The official target capacity and utilization rates for the 2012-2013 school year and beyond are not yet available. All references to building utilization rates in this document are based on the designed capacity of building Q287 as per the Program of Requirements ("POR") from the SCA.

⁵ Enrollment projections are based on a plan of six general education sections. Actual enrollment may vary depending on demand.

⁶ Enrollment projections are based on a plan of four general education or Integrated Co-Teaching sections and one Self-Contained section per incoming grade. Actual enrollment may vary depending on demand. All references to building utilization rates in this document are based on the designed capacity of building Q287 as per the Program of Requirements from the School Construction Authority; P.S. 330's enrollment data from the 2012-2013 Audited Register (as of October 26, 2012), which do not include Long Term Absences ("LTAs"), students who have been absent continuously for 30 days or more as of October 26, 2012; and the projected enrollment for the portion of P.S. 143's kindergarten sections in Q287. 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 conducts a detailed site survey and space analysis of the building to assess the amount of space available in the building

A joint public hearing regarding the proposal was also held at P.S. 143 on April 11, 2013. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 175 members of the public attended the hearing and 19 people spoke. Present at the meeting were District 24 Community Superintendent Madelene Chan; District 24 Community Education Council (“CEC 24”) Member Connie Partinico; Jerry Brito, Principal of P.S. 143; Alma Salgado representing the P.S. 143 School Leadership Team; Katie Boyajien representing the P.S. 330 School Leadership Team; Louise Emanuel, representative of Assembly member Aubrey; Joel Trinidad Santos, representative of Councilmember Ferreras; Deanna Foote, representative of Senator Peralta; and Emily Ades from the Office of Portfolio Management.

The following comments and remarks were made at the joint public hearings on April 9, 2013 and April 11, 2013 on the proposal:

Comment 1: Connie Partinico, CEC 24 Member, expressed approval of the proposal and noted that the CEC is listening to the communities concerns.

Comment 2: Principal Jerry Brito commented that despite the overcrowding concerns, P.S. 143 will still strive to provide the highest quality of education for the students. He expressed appreciation for the large turnout and assured the families that they do have a voice within their community.

Comment 3: Alma Salgado, Parents Association President, spoke against the proposal with concerns that P.S. 143 will still be overcrowded:

- a) She expressed that the lunchroom is crowded.
- b) She commented that she doesn’t agree with the plan to annex the students in Q287 because P.S. 143 and P.S. 330 will be divided, and the students will not have a sense of belonging, and therefore this proposal will create confusion among the parents.
- c) She requested that the School Construction Authority (“SCA”) build more schools in the area.

Comment 4: A commenter asked if the Gifted and Talented (“G&T”) program will move to the new building.

- a) The commenter requested that this G&T program be offered in the same location that it is in now.

Comment 5: A commenter asked if P.S. 330 will have the same school staff in the new building.

Comment 6: Multiple commenters expressed concerns about the overcrowding at P.S. 143.

- a) Commenters asked for a long-term solution to the overcrowding that has persisted at P.S. 143 for many years.

- b) Commenters expressed concerns that kindergarteners are not being served in the main building.
- c) A commenter expressed concern that the community was told that the Transfiguration Annex was a temporary solution but a long-term solution is not replacing the annex. The proposal is another temporary solution.
- d) A commenter expressed concern that Q287 was supposed to alleviate the overcrowding at P.S. 143 and that is not the case.
- e) A commenter expressed concerns about the high utilization at P.S. 143.
- f) A commenter expressed concerns that there is not adequate space for students with special needs.
- g) A commenter expressed concerns that the overcrowding will affect the performance at the school.
- h) One commenter offered a long-term solution whereby the SCA could utilize the property adjacent to the school where the TCUs are to build an addition which would be permanent and increase the capacity of the main building.

Comment 7: Multiple commenters inquired about where the P.S. 143 annex will be located in the Q287 building.

- a) One commenter inquired if the library and dance room at P.S. 143 will be used as classrooms.

Comment 8: Several commenters expressed concerns about the condition of the Temporary Classroom Units (“TCUs”).

- a) One commenter mentioned that the rooms in the TCUs are small and the teachers do not have space for daily activities.

Comment 9: Several commenters expressed concerns about large class sizes.

- a) One commenter praised the staff but said that they face challenges with such large class sizes.
- b) One commenter expressed concerns about the impact of the proposal on the class sizes at P.S. 330.

Comment 10: One commenter expressed that due to the large Spanish-speaking population in this community, the DOE does not address their concerns.

The DOE received 2 written comments and 2 oral comments through its dedicated phone line for this proposal.

Comment 11: Councilmember Ferraras sent a letter that asked for the formation of a task force to collaborate on establishing long-term solutions to address the overcrowding.

Comment 12: Assembly member Peralta sent a letter that expressed concerns about P.S. 143.

- a) The condition of the TCUs regarding flooding and needed repairs to the ramps. He also expressed concerns about necessary repairs to the main building.
- b) He also expressed concerns regarding the safety of the students who travel back and forth between the main building and the TCUs.

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

Comment 1 expressed approval for the proposal and does not require a response.

Comments 2 and 10 were not directly related to the proposal and do not require a response.

Comments 6 (a), 6 (c), and 11 expressed opposition to the proposal because it does not address a long-term solution to the overcrowding at P.S. 143 and in Corona overall.

While admittedly temporary, the proposed re-siting of a portion of P.S. 143's kindergarten is the best available solution for the 2013-2014 school year. The DOE is in the process of implementing long term solutions to overcrowding in Corona by adding elementary school seats through new construction. Currently in District 24, there are seven buildings scheduled to open by September 2015, including Q287, which will collectively offer 3,986 seats. However, until these new buildings open, the DOE will need to continue to employ short-term solutions each year to accommodate all students in Corona.

As we await completion of the five new elementary school buildings mentioned above, the DOE is evaluating several other strategies to alleviate overcrowding in P.S. 143. One of the strategies used is incubating new schools in alternate locations so that when the new buildings open, they will serve more students and utilize the new capacity available more efficiently, as was done with P.S. 330.

Comments 3 (a), 6 (b), 6 (e), 6 (f), and 6 (g) express opposition to the proposal since it does not address the existing needs of the students at P.S. 143 which include a high building utilization, an overcrowded lunchroom, kindergarteners not being served in the main building, and lack of space to properly educate both general education and special education students ultimately resulting in a drop in student performance.

As mentioned above, this proposal addresses the immediate need for P.S. 143 to accommodate the majority of its zoned students, which is always the priority. This proposal is intended to recover a large portion of the kindergarten seats that will be lost due to the expiration of the lease for the Transfiguration Annex and to accommodate the continued growth in incoming kindergarten students in the community. Although this proposal will not completely recover the seats lost due to the expiration of the lease for the Transfiguration Annex, it will help P.S. 143 continue to accommodate incoming kindergarten students who cannot be accommodated in Q143 due to overcrowding.

The DOE acknowledges the severe overcrowding in District 24 and its effects on the community. Building Q287 is the first of several new construction projects in District 24. There are 6 additional funded projects in the current capital plan with an anticipated completion date of September 2015. These new sites will add additional capacity and will help alleviate overcrowding in the district. Four of these projects are in the Corona/Elmhurst neighborhood.

Finally, although a utilization rate in excess of 100% may suggest that a building will be over-utilized or over-crowded in a given year, this rate does not account for the fact that rooms may be programmed for more efficient or different uses than the standard assumptions described in the EIS.

Comment 3(b) expresses opposition to the proposal as it pertains to dividing the school communities and causing confusion amongst the families.

Given the finite number of buildings available in New York City, the DOE attempts to use all of its school buildings as efficiently as possible. Co-location is therefore very common in New York City schools – with 33% of all DOE buildings housing more than one school organization - as there are not sufficient school buildings to allow each school organization to operate its own building. A co-location means that two or more school organizations are located in the same building. While they share common spaces like auditoriums, gymnasiums, and cafeterias, each school is allocated particular classrooms and spaces for its own students' use. The DOE is confident that the principals of P.S. 330 and P.S. 143 will be able to create a collaborative and mutually respectful environment for all students, staff, and faculty members in Q287, as well as keep the families well-informed of school updates.

Comments 3(c), 6(h) expressed concerns that the SCA is not building more schools in the area to alleviate overcrowding, and one commenter suggested that the land adjacent to the school be used to construct a new building addition.

As mentioned above, the by 2016, the SCA is building 4 new schools in the Corona/Elmhurst neighborhoods to address the overcrowding. The property next to the school is not under the control of the New York City Department of Education, but rather the Department of Parks and Recreation, and is therefore not presently available for the construction of a new school facility.

Comment 4 and 4 (a) pertained to the G&T program at P.S. 330 and questioned whether it will remain at the current location or move with P.S. 330 to the new building.

The re-siting is not expected to impact the educational options of students currently attending P.S. 330. The G&T students will continue to be served at P.S. 330 in the new location in building Q287. All currently enrolled students at P.S. 330 will continue to receive the same high standard of education in building Q287 that they received in building Q269.

Comment 5 inquired if P.S. 330 will have the same staff in the new building.

Although the DOE does not anticipate that the re-siting will affect personnel needs, P.S. 330 will need to hire additional teachers, administrative staff, and non-pedagogical (school support) staff as a result of increased enrollment during the course of its phase-in. The precise number of positions needed for subsequent school years will be determined once annual enrollment projections are released in the spring of the preceding school year.

Comment 6 (d) expressed concerns that Q287 will not alleviate P.S. 143's overcrowding as it was intended to do.

P.S. 330 is being re-located to a neighborhood where approximately 84% of the students of P.S. 330 currently live. The re-siting of P.S. 330 to Q287 will have a positive impact on the community by providing additional seats for students in District 24, particularly in the Corona area and in schools surrounding building Q287, and by providing a school that is closer to where the majority of the children reside.

Comment 7 inquired where the annex will be located in Q287.

If this proposal is approved, a planning committee consisting of the Office of Space Planning, Division of School Facilities, and representatives and staff at P.S. 143 and P.S. 330 will work together to plan the temporary annex for the portion of kindergarten students to Q287 and keep the communities of both schools informed.

Comment 7(a) inquired if the dance room and the library in P.S. 143 will be used for classrooms.

There are currently no plans to use the dance room or the library at P.S. 143 as classrooms.

Comments 8, 8(a), 12 (a) and 12 (b) expressed concerns about the size and the condition of the TCU's and the safety of the students who use them.

Concerns raised regarding the condition of the TCUs and main building are typically raised with the Division of School Facilities first, which would evaluate whether the concerns can be addressed through maintenance. Should those concerns exceed the scope of maintenance, DSF may refer the concerns to the SCA for further review and consideration. Also, each year during the Capital Plan amendment process, we ask CECs for their feedback regarding capital needs at specific schools that may not have been identified in the draft Plan Amendment.

In terms of 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. The School Safety Plan is updated annually by the Committee to meet changing security needs, changes in organization and building conditions and any other factors; these updates could also be made at any other time when it is necessary to address security concerns. The Committee will also address safety matters on an ongoing basis and make appropriate recommendations to the Principal(s) when it identifies the need for additional security measures.

Comments 9 (a) and 9 (b) expressed concerns about the class sizes at P.S. 330 and P.S. 143.

Currently, based on the 2012-2013 audited register, the average size of P.S. 143's kindergarten through second grade and fifth grade classes are equivalent to District 24's kindergarten through second grade and fifth grade classes average class size. In addition, the average size of P.S. 143's third and fourth grade classes is lower than the District 24 average general education third and fourth grade class sizes.

As it pertains to P.S. 330, as stated in the EIS, there will be under-utilized space in Q287, which will provide sufficient space to temporarily accommodate a portion of P.S. 143's kindergarten for the 2013-2014 school year. Due to the fact that P.S. 330 would only utilize an additional six full-size rooms and 1 full-size equivalent administrative room to serve the projected number of kindergarten students, there is sufficient capacity in Q287, and this expansion is not expected to impact P.S. 330's average class size.

Changes Made to the Proposal

No changes have been made to this proposal.