



COMMUNITY EDUCATION COUNCIL DISTRICT 15

131 Livingston Street, Room 301, Brooklyn, New York 11201

CEC15@schools.nyc.gov | tel. 718-935-4267 | facebook.com/CECD15 | CECD15.org

March 28, 2018

Dear Chairperson M^cRae and Community Board 2 Members,

The District 15 Community Education Council would like to express our concerns about the proposed building development for 80 Flatbush Avenue and the potential impact on District 15 families and educators. Like you, we would like to work collaboratively and at the neighborhood level in this process but we find that when developments reach this scale community input seems to collapse.

In an effort to assist with you with your thoughtful advice to Councilman Stephen Levin on this project we would like to offer you the following information in regards to District 15 and information that we have gathered from our stakeholders.

Our CEC represents the 35 elementary and middle schools in District 15. We work together with the Department of Education, the District Superintendent, school administration and staff, and the parents and guardians to assess, offer advice and support the future progress of schools in our District. We can truly and honestly say that we represent the voice of our 30,000 families and over 5,000 administrators, teachers and staff.

In July 2017, and in response to the Draft Environmental Impact Statement Scoping Meeting where 90% of the public comments were opposed to this project, and after reviewing all the evidence and facts, CEC15 passed a [Resolution](#) in summary stating: **The current proposal will not alleviate, but likely exacerbate, both the current student overcrowding issue and the school equity issue in District 15. CEC15 proposed that ECF and Alloy provide 750 to 1,000 primary school seats to truly address district overcrowding and integration.**

Past and current members of CEC15 have been in attendance for at least 6 ECF presentations including the DEIS Scoping Meeting, District Planning Presentations, CB2 Land Use and Education Meeting Presentations.



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We have met with numerous stakeholders including representatives from Citywide Council on High Schools (CCHS), District 13 leaders, your Education Committee members and Chair, PTA leaders, and parents, teachers and staff in the surrounding schools. Documents have been meticulously reviewed and commented on and as far as we can tell change does not come in a satisfactory enough way.

Now, a year later, we realized that there is no room for negotiation on the developers side. This is both frustrating and disappointing for all parties involved. With that being said, CEC15 is still open to discussion and would like to find some common ground.

Our concerns are real and include:

1, Insurmountable Problems with Small Elementary Schools

Our Schools Chancellor, Carmen Fariña, has stated many times that a small school model doesn't work. In this case, an elementary school of 350 students is too small to support itself financially. A large elementary school of 1,000 seats, however, will be able to budgetarily support itself and be allowed to grow exponentially with the market growth.

Typically, small K-5 schools of 350 students do not have sufficient funds to develop the programs that people want. The administration of a small school spends much of their time nickel and diming to try to survive. Lack of funds does not allow for necessary internal special education resources and puts the school at risk, due to low enrollment from lack of support services and special programs, leading to risk of closure.

In addition, a 350 seat school can't typically accommodate public Pre-K and with the introduction of the Mayor's 3-K initiative, another level of complication comes with the lack of space available in this District.

The small school model is also known to cause problems with Diversity or lack of. In creating a school utilized primarily by one block of residents this will exacerbate the equity issue CEC15 is committed to solving. Though the project designates some affordable housing units, given



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current zoning tendencies, we see over and over again that the forecasted calculations are incorrect.

The DoE is making strides with their plans for Equity & Excellence for All. Even if the DOE considered a D13/D15 lottery admissions policy to diversify the proposed elementary school, which we support, we anticipate push back from the families in terms of this specific location. Parents won't want their children to cross Flatbush Ave. We are experiencing this now in Sunset Park. In the face of massive overcrowding, parents choose to bus their child upwards of 2 hours round trip rather than discuss expanding capacity for new school construction in the growing area West of 3rd Ave.

2. Underestimating Future Seat Exacerbates Overcrowding

We question the multiplier being used by ECF to estimate actual need. This project utilizes an outdated formula to determine primary school seats and doesn't weigh middle school impact. The project's completion date of 2022 increases the likelihood that this multiplier will be more inadequate and the likelihood that all the new primary school seats at 80 Flatbush will be used by the residents of the development.

In addition, the information used in Table 4-2 of the proposal showing the schools currently serving the study area of Subdistrict 3 does not include actual to date or projected information. We are not in a holding pattern. Development effects school seat need and we need to start talking about the future.

The DoE's Office of District Planning uses last year's data from the Blue Book, which only relates to General Ed seats. Subdistrict 3 has many schools where ICT and NEST classrooms result in less children per classroom. We support these models and expect that our District will continue to promote these wonderful and inclusive Special Education models. And because class sizes are limited in both of these models, and because the Blue Book data is based on General Ed numbers, the tables offered in the proposal are only useful in part.



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This is an unusual block in an underutilized part of our District. We would like to propose that an assessment be done in regards to the surrounding areas including D13 families, and desired education models, both in D15 and in D13. When we talk about diversifying the school, and suggest a D13/D15 admission policy to solve problems, then we should also clearly define the new Subdistrict area and what that need would be.

Merely assessing D15 Subdistrict 3 is inadequate when 80 Flatbush Ave is on the border of D13 and would likely draw from residents in walking distance, rather than families that would have to travel excessive distances.

To that end, we believe that this project will likely contribute further to District 15's serious school overcrowding situation by missing the mark in their calculations.

3. Student Health and Safety Concerns

Current traffic and congestion in the vicinity puts our elementary age children at risk. A larger elementary school of 1,000 seats can leverage DOT to rethink and reassess the use of the streets and sidewalks creating a safer environment for all who enter the area.

Safety during construction is another big concern of our community members who believe that Khalil Gibran International Academy should be relocated during construction. It says clearly in the proposal that vibrations can not be mitigated during construction. Air quality will certainly be a problem. These children, teachers and staff deserve a comfortable home during the 8 years of construction. We support the move of KGHS to a temporary building location during construction to support their programs and learning needs.

4. Responsibly Utilization of Public Resources

We all have to advocate that our city and developers build for the future. PS 38, the zoned school for 80 Flatbush Ave, is currently underutilized and our seat need TODAY is not as great in Subdistrict 3. But we know that in only a few years schools can become overutilized very quickly.



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For example, 10 years ago, the DoE gave up the land lease in what would have become the PS 58 Annex in Carroll Gardens. PS 58 is now bursting at the seams, with capped wait lists for zoned Kindergarteners and had to move its Pre-K offsite. All this came without any large high rises in the growth of the neighborhood. The site is now a Private School.

We are looking for a transparent process when it comes to use of public funds. DOE property in dense locations is too precious not to cultivate to it's best use. This plan is not forecasting a realistic future. The truth is that we need more than 350 school seats for current and future capacity in District 15.

What is the market value of the DOE site and is the taxpayer receiving that fair market value in the construction of these two schools and who makes those calculations as the air rights are negotiated?

The NYC School Construction Authority (SCA), currently has a budget of \$5.9 billion to build new school capacity in the city. The SCA can use its own funds to build a school on the proposed site, without granting zoning variances, and the added seats would improve district-wide overcrowding.

With all of this in mind, we respectfully request that further conversations regarding this proposal continue until all stakeholders and constituencies are comfortable with moving forward.

As it is written, CEC15 is unable to support the 80 Flatbush Ave proposal.

Respectfully,

Camille Casaretti
CEC15 President

Please see the attached CEC15 Resolution dated July 27, 2017



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July 28, 2017

RESOLUTION TO COMMENT ON **80 FLATBUSH**

The District 15 Community Education Council “CEC 15” held a meeting on Tuesday July 25, 2017. After reviewing all the evidence and facts, CEC 15 passed the following Resolution:

WHEREAS, CEC 15 hereby resolves to comment on the Education Construction Fund (ECF) project at 80 Flatbush;

WHEREAS, the members of CEC 15 present at this meeting consisted of Camille Casaretti, Scott Powell, Neal Zephyrin, Charles Star, Mark Bisard, Nicole Brier, Antonia Ferraro Martinelli, Kathy Park Price, and Elizabeth Velez;

WHEREAS, on June 28, 2017 former CEC 15 members Henry Carrier and Jiin Wen, and current CEC 15 member Nicole Brier attended a Draft Environmental Impact Statement (DEIS) Scoping meeting on the proposed development at 80 Flatbush Avenue;

WHEREAS, the Education Construction Fund (ECF) selected Alloy to redevelop the 350 seat Khalil Gibran International Academy, and to create a 350 seat elementary school, two large buildings offering 800 to 950 residential units combined, as well as retail and office space;

WHEREAS, Alloy requested variances including zoning changes to allow for an increased FAR of 18, almost three times the current allowance of 6.5;

WHEREAS, Alloy requested a transfer and lease of city and state property;

WHEREAS, Alloy requested state funding in the form of tax-exempt bond financing from the Education Construction Fund (ECF);

WHEREAS, 90% of public comments at the well-attended scoping meeting were opposed;



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WHEREAS, at the scoping meeting, the local fire chief and The Boerum Hill Association voiced concerns about traffic and congestion based on the location abutting 3rd Avenue and State Streets, in the vicinity of the Atlantic Center Terminal and Barclays Center;

WHEREAS, at the scoping meeting, several local Parent Teacher Associations were present and opposed to the project at 80 Flatbush;

WHEREAS, Khalil Gibran International Academy and the business community are in Favor;

WHEREAS, in accordance with the The City Environmental Quality Review (CEQR) Technical Manual under Chapter Six, ECF show a net increase in primary school seats to District 15 using the multiplier for estimating elementary school students generated by new residential units for Brooklyn;

WHEREAS, the formula likely underestimates the number of added students, as it is widely seen as outdated;

WHEREAS, we ask the Environmental Impact Statement scope to re-examine if this multiplier is adequate for the current growth rate for the borough of Brooklyn;

WHEREAS, this multiplier does not account for middle school seats. This project will likely generate more total students than the number of additional seats provided in all scenarios proposed by ECF/Alloy and contribute further to District 15's serious school overcrowding situation;

WHEREAS, the NYC School Construction Authority (SCA), currently has a budget of \$5.9 billion to build new school capacity in the city;

WHEREAS, if the SCA used its own funds to build a school on the proposed site, without granting zoning variances, the added seats would improve district-wide overcrowding;

WHEREAS, several community members voiced additional concerns and opposition to the 80 Flatbush project at the July 25th CEC 15 Business Meeting.



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The District 15 Community Education Council therefore,

RESOLVES TO COMMENT, as an opportunity to refine ECF's proposed Alloy development at 80 Flatbush Avenue. The current proposal will not alleviate, but likely exacerbate, both the current student overcrowding issue and the school equity issue in District 15. ECF's project utilizes an outdated formula to determine primary school seats and doesn't weigh middle school impact. The project's completion date of 2021 increases the likelihood that this multiplier will be more inadequate and the likelihood that all the new primary school seats at 80 Flatbush will be used by the residents of the development. Though the project designates some affordable units, given current zoning tendencies, creating a school utilized primarily by one block of residents exacerbates the equity issue CEC 15 is committed to solve. CEC 15 proposes ECF and Alloy provide 750 to 1,000 primary school seats to truly address district overcrowding and integration. CEC 15 encourages ECF and NYC School Construction Authority to renovate Khalil Gibran International Academy and utilize the remaining property at the site to materially increase the number of seats available to all children in District 15, fully accounting for the increased demand anticipated from all area residential development. The current proposal fails to do that. However, we support ECF in its mission to provide more schools. CEC 15 looks forward to working with ECF to help 80 Flatbush better meet the needs of District 15.

RESOLUTION PASSED UNANIMOUSLY.

CC:

Jennifer Maldonado, Exec. Director, NYC Educational Construction Fund

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Anita Skop, Superintendent District 15

Council Member Stephen Levin