

October 20, 2020

Commissioners of Charles County
200 Baltimore Street
La Plata, MD 20646

**Re: School Allocation Policy Changes
Comments from Jennifer Abell, CCBOE**

Dear Commissioners,

The Board of Education for Charles County would like to communicate our concerns regarding the proposed changes to the current APF manual and the impact on Charles County Public Schools. The statements below are from Jennifer Abell, CCBOE Board Member and should be recorded as comments received for the Commissioners Public Hearing held on October 20, 2020.

- Do not include areas outside of the Opportunity Zones, such as in areas of Hughesville, Benedict, Bel Alton, Newburg, Swan Point, Cobb Island, White Plains, and the towns of Indian Head and La Plata for possible exemptions from school seat allocations if they meet one of the three criteria:
 - #1 WURC Zone – Waldorf Urban Redevelopment Corridor Zones
 - #2 Mixed-Use,
 - #3 contain Affordable/Workforce Housing
- The original proposal presented to the Commissioners on June 2, 2020 limited the granting of exemptions to Option 1 (The Development District) or Option 2 (The Opportunity Zone). The amended draft greatly increases the number of areas of the county that could see development occur for schools that do not have access to public water and sewage. Even if construction funding is available for new construction or additions, there are concerns with increased enrollments at schools on private wells and septic systems due to demand loads. The State (IAC – Interagency Commission on School Construction) strongly encourages that new school facilities be served by water and sewer.
- Most schools outside of the Development District are not scheduled for renovation/expansions. Priority Development Projects can create pressures on these schools, leading to overcrowding, expanded class sizes, need for additional portable classrooms, and/or redistricting.
- The majority of CCPS school facilities are located in PFA's, but the rural schools that are located in PFA's have space/land limitations that may prevent the expansions or the ability to add portable classrooms.

- Schools in the rural PFA's are more difficult to provide relief during redistricting because of the large attendance zones they serve and the dispersion of students. Additionally, the length of bus rides can exceed 45 minutes, which tends to be a critical point where behavior issues can arise.
- Most of the rural PFA's do not have the infrastructure to support mixed-use development, i.e. roads, water/sewer, high-speed internet, fire suppression, etc.
- The majority of rural PFA's will have trouble qualifying under the exemption for mixed use as the business/commercial components will be difficult to find appropriate users to support in the rural areas. There are existing mixed use development projects in Waldorf (i.e. Westchester at the Pavilion) where commercial spaces are underutilized.
- The only potentially viable exemption for the rural PFA's is for 25% affordable/workforce housing and based on the examples presented by PGM staff, the projects will need to be apartment projects that rely on public water/sewer.
 - If these are built, there will be small population centers without the necessary services to support the residents and more vehicular trips will be required.

Sincerely,



Jennifer Abell
Board Member, Charles County Board of Education