

Dear Committee,

I am in favor of this bill, but three major problems stand out.

1) Many people living in a region commute to other areas for work. It is unclear what "THE TOTAL NUMBER OF JOBS BY PLACE OF WORK" actually means. Are they places of work within the region? This proportionality seems to penalize more residential counties at the expense of counties with large businesses, such as federal/other government buildings. I am also worried about a positive feedback loop- as it is much easier to predict and legislate/add more housing than it is to provide jobs. Like common network effects, nodes of residential housing will only see more housing, not jobs.

2) State rated capacity is not a good number to use. This bill should defer to local-rated capacity. Local school systems know their buildings the best. In Howard County, for example, our local capacity takes into account various special education and other specialized program spaces which the IAC does not consider the same in its calculations. This will likely apply to other counties, but **by using state-rated capacity many of Howard County's schools would likely see their students increase by +100 students/building at 100%SRC, often in Title 1 schools.** This leads to an imbalance between the needs of school-aged children (infrastructure) and housing. We already have students in schools with one-way hallways as it is.

3) Frequent redistricting is in direct opposition to the learning goals the Blueprint seeks to achieve. It is disruptive to communities and the learning process- redistricted students do see setbacks. Consideration of geographically located schools to relieve overcrowding should be left up to local education agencies and shouldn't be automatically applied as a "one size fits all" approach to housing.

Please see my email below with Howard County specific data if interested.

HB503/SB430- Regional Housing Infrastructure Gap will cause undue strain on Howard County Schools and continually interfere with local communities.

1) I don't understand the rationale for a "housing gap" in the first place. This is not how our country and county was built. What does "jobs by place of work" mean? We have at least 44,000 thousand federal workers in Maryland US District 3. Is this housing gap intentionally ignoring that people commute to work far away from where they live? More importantly....

2) In using state-rated capacity for our schools, locally-defined capacity is completely ignored. In many cases, this difference is more than a **hundred students.** (The chart

of state-rated vs local capacity is presented below, as well as the difference in students for our schools)

3) In prohibiting what are essentially county infrastructure concerns by saying development can proceed if the state-rated capacity of geographically located schools is under 100%, this bill does two things:

A. Ignores disruptions to local communities caused by frequent redistricting. Students and families build a large part of their friends, lives, and healthy communities around school.

B. Ignores that redistricting is a lengthy process. The Bryant Woods ES redistricting begun in Fall 2024 will not result in actual changes until the 26-27 school year. How long will our students have to be in overcrowded schools?

[02 13 25 Initiate Boundary Review Process in 2025 Presentation.pdf - Google Drive](#)

Here is are the parts of the bill I am particularly concerned about:

(E) A LOCAL JURISDICTION SHALL CITE AT LEAST ONE OF THE FOLLOWING AS A JUSTIFICATION TO DENY A HOUSING DEVELOPMENT PROJECT APPLICATION THAT CLEARLY OUTWEIGHS THE NEED FOR HOUSING:

(5) THE HOUSING DEVELOPMENT PROJECT IS LOCATED, AT THE TIME OF APPLICATION, IN A SCHOOL ATTENDANCE AREA:

28 (I) THAT HAS UNIFORMLY VERIFIABLE CURRENT OR PROJECTED FULL-TIME ENROLLMENT FOR THE SCHOOL THAT EXCEEDS 100% OF THE SCHOOL'S CURRENT OR ESTIMATED STATE RATED CAPACITY

(II) FOR WHICH THE SUM OF THE UNIFORMLY VERIFIABLE CURRENT OR PROJECTED FULL-TIME ENROLLMENT FOR THE SCHOOL AND ITS GEOGRAPHICALLY ADJACENT SCHOOLS EXCEEDS 100% OF THE SUM OF THE CURRENT OR ESTIMATED STATE RATED CAPACITY FOR THOSE SCHOOLS; AND

(III) THAT HAS BEEN DETERMINED BY THE LOCAL JURISDICTION, USING UNIFORMLY VERIFIABLE OBJECTIVE CRITERIA, TO HAVE INADEQUATE SCHOOL CAPACITY;

Again, because stated-rated capacity is defined and used in (i) and (ii), I believe local-rated capacity cannot be used for a reason in (iii). **I'm asking that you intentionally use local-rated capacity in this bill.**

Here is the HCPSS Chart comparing State-rated vs. Local capacity. [06 20 24-2024 Feasibility Study Report.pdf](#) Page 9.

Table 2.3 Local Capacity and State Rated Capacities for School Year 2023-24

Elementary	Local	State
Atholton ES	424	463
Bellows Spring ES	726	767
Bollman Bridge ES	609	775
Bryant Woods ES	289	438
Bushy Park ES	732	727
Centennial Lane ES	603	731
Clarksville ES	543	517
Clemens Crossing ES	521	525
Cradlerock ES	398	573
Dayton Oaks ES	719	793
Deep Run ES	719	798
Ducketts Lane ES	650	709
Elkridge ES	713	842
Forest Ridge ES	647	662
Fulton ES	738	762
Gorman Crossing ES	735	902
Guilford ES	465	464
Hammond ES	653	681
Hanover Hills ES	810	958
Hollifield Station ES	732	727
Ilchester ES	559	686
Jeffers Hill ES	377	412
Laurel Woods ES	609	680
Lisbon ES	527	513
Longfellow ES	512	556
Manor Woods ES	681	593
Northfield ES	700	731
Phelps Luck ES	597	617
Pointers Run ES	744	780
Rockburn ES	584	716
Running Brook ES	449	582
St Johns Lane ES	612	593
Stevens Forest ES	380	450
Swansfield ES	650	681
Talbott Springs ES	490	434
Thunder Hill ES	509	532
Triadelphia Ridge ES	584	614
Veterans ES	799	914
Waterloo ES	603	660
Waverly ES	788	948
West Friendship ES	414	422
Worthington ES	424	562

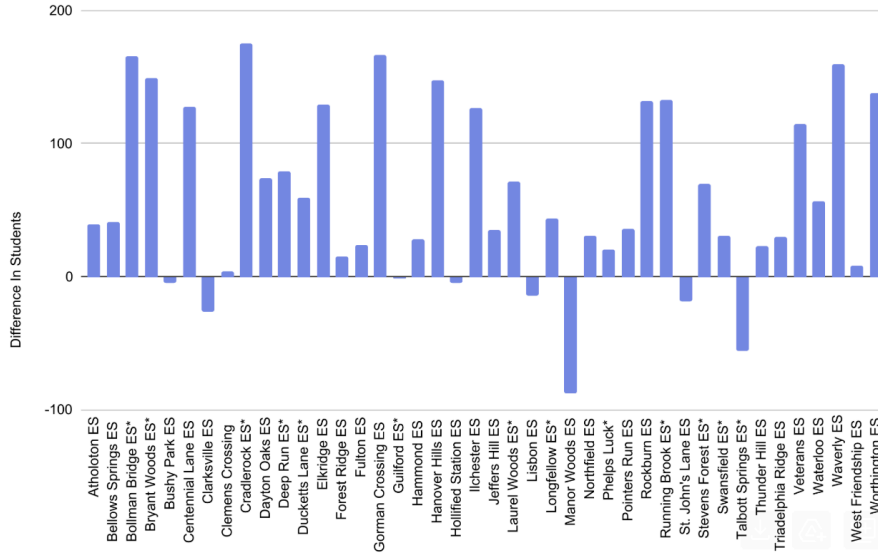
Middle	Local	State
Bonnie Branch MS	701	732
Burleigh Manor MS	779	795
Clarksville MS	643	619
Dunloggin MS	565	619
Elkridge Landing MS	779	760
Ellicott Mills MS	701	816
Folly Quarter MS	662	732
Glenwood MS	545	640
Hammond MS	604	679
Harpers Choice MS	506	619
Lake Elkhorn MS	643	765
Lime Kiln MS	721	732
Mayfield Woods MS	798	773
Mount View MS	798	760
Murray Hill MS	662	685
Oakland Mills MS	506	598
Patapsco MS	643	598
Patuxent Valley MS	760	770
Thomas Viaduct	740	754
Wilde Lake MS	740	590

High	Local	State
Atholton HS	1530	1811
Centennial HS	1360	1530
Glenelg HS	1420	1675
Guilford Park HS	1658	0
Hammond HS	1445	1434
Howard HS	1400	1051
Long Reach HS	1488	1434
Marriotts Ridge HS	1615	1434
Mt Hebron HS	1400	1408
Oakland Mills HS	1400	1135
Reservoir HS	1573	1339
River Hill HS	1488	1483
Wilde Lake HS	1424	1434

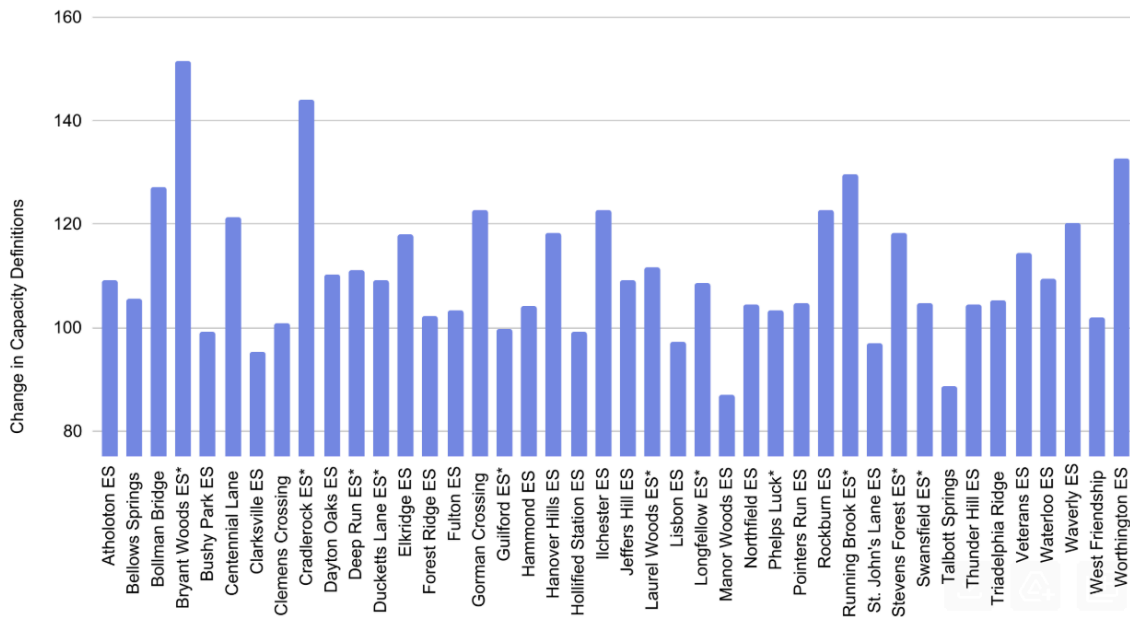


Here is a chart I made showing the difference for Elementary Schools. The schools with asterisks are **Title 1 schools, which will have some of the highest increases.** MS present the same trend, while HS are mixed.

Difference In Students Between State-Rated Capacity and Local Capacity



Change in "Capacity" if State-Rated Capacity is used



Thank you,

Ryan Powers

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