

**From:** Jim Stanley [mailto:jjs1791@gmail.com]

**Sent:** Thursday, April 19, 2018 10:06 PM

**To:** Christopher G. Williams <cwilliam@pasco.k12.fl.us>

**Cc:** Kurt S. Browning <ksbsos@pasco.k12.fl.us>; Cynthia A. Armstrong <carmstro@pasco.k12.fl.us>; Alison G. Crumbley <acrumble@pasco.k12.fl.us>; Allen Altman <alaltman@pasco.k12.fl.us>; Colleen Rene Beaudoin <crbeaudo@pasco.k12.fl.us>; James S. Luikart <jluikart@pasco.k12.fl.us>

**Subject:** Submission of Proposal for Lower Cost Regulatory Alternatives and Request for Draw-Out Proceeding

Dear Mr. Williams,

Please accept this communication as my formal proposal for lower cost regulatory alternatives and a formal request for a draw-out proceeding, which are submitted in response to a proposed Rule by the District School Board of Pasco Count ("District") to change the student attendance boundaries for Anclote High, J.W. Mitchell High, River Ridge High, Gulf High, Gulf Middle, Paul R. Smith Middle, Seven Springs Middle and River Ridge Middle Schools to be effective July 1, 2018 ("Proposed Rule").

This proposal and request are being submitted in good faith by me, an individual substantially affected by the Proposed Rule, and are being submitted subsequent to the District's Amended Notice of RuleMaking published March 30, 2018 and subsequent to the recommendation by the Superintendent of a Proposed Rule, since both of these events occurred subsequent to an earlier Submission of Proposal for LCRA's and the District's response to it.

The following constitutes my proposed changes to the Proposed Rule recommended by the Superintendent:

- A. Assign the neighborhoods of Sienna Woods, Ellington and Longleaf Neighborhoods 1, 2 and 3 to the Mitchell/Seven Springs attendance boundary
- B. Assign the neighborhood of Asturia to the River Ridge Middle and High School attendance boundary
- C. Adopt the address verification policy and process described by Mr. Gadd at the April 10 public hearing

According to the data provided by the District, Longleaf, Ellington and Sienna Woods presently have a total of 99 middle school and 132 high school students. Since these neighborhoods are effectively built out, and my proposal leaves Longleaf Neighborhoods 4&5 assigned to the River Ridge Middle and High School attendance boundary (as does the Superintendent's plan) the number of students from these neighborhoods for the next three school years (2018-2019, 2019-2020, 2020-2021) will likely remain stable. The same data show that Asturia presently has 15 middle and 11 high school students, and is projected to have 23/27 in 2018-19, 46/54 in 2019-2020 and 69/81 in 2020-21. According to the information provided by Mr. Gadd, the District expects address verification to reduce the populations of Mitchell and

Seven Springs by 3%, which amounts to a reduction of 50 students at SSMS and 62 students at Mitchell. Under my proposal, the populations of Seven Springs and Mitchell would decrease in years two and three, with a net difference in year 3 of only 3 students at Seven Springs and 16 students at Mitchell. Further, Mr. Gadd stated that he turned over a file to the Property Appraiser with 3,800 addresses that may be cases of homestead exemption fraud. If homestead exemption is removed from all of these addresses, that will result in increased annual tax revenue to the County of \$190 million, of which the District would receive \$1.2 million. Therefore, my proposal effectively achieves the objectives of the District and does so at no additional cost to the District and may actually result in an increase in revenue.

This plan has the additional benefit of maintaining feeder patterns for Longleaf/Ellington/Sienna Woods with our adjoining neighborhood of Fairway Springs, and keeping together Starkey Ranch and Asturia, which you announced on April 10 will be the only two neighborhoods served by the Starkey Ranch K-8 scheduled to open in Fall, 2021. This proposed plan is focused on the period ending with 2020-21 school year, since you also announced plans to rezone west Pasco schools prior to the opening of the K-8 school in 2021.

Additional reductions of student populations at Seven Springs and Mitchell will be achieved if the District reopens school choice to allow those students who are presently attending (or would like to attend) River Ridge Middle and High to do so, particularly if the District continues to provide transportation. This option would not increase costs, as Longleaf Neighborhoods 4 and 5 would still be in the River Ridge attendance boundary and bus service would be necessary for those neighborhoods.

Last and of particular significance, if the District adopts this plan, I and my neighbors will not pursue any additional legal challenges to the 2018-2019 boundary process, saving the District the expense of defending certain litigation.

If the District disputes any of the factual or legal assertions set forth above and elects to proceed with the Proposed Rule in lieu of these lower cost regulatory alternatives to the Proposed Rule, I respectfully request a draw-out proceeding pursuant to Section 120.54(3)(c)2, Florida Statutes to address any disputed factual or legal assertions. The workshop and public hearing for the Proposed Rule were conducted before the Superintendent's recommendation and did not provide an adequate opportunity for myself, my neighbors and other affected persons to protect their substantial interests.

I look forward to your response.

Sincerely,

James J. Stanley  
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