

Exhibit B-31

Patrick M. McKenna

From: Robert Pingar <rpingar@westtown.org>
Sent: Tuesday, December 03, 2019 11:57 AM
To: Patrick M. McKenna; Will Ethridge
Cc: Robert Pingar
Subject: Fwd: Party status for Crebilly Hearing
Attachments: Board resolution seeking party status for Crebilly 2017.pdf

Pat & Will. FYI.

Rob

From: "Scanlon, James R" <jscanlon@wcasd.k12.pa.us>
Sent: 12/3/19 11:53 AM
To: "rpingar@westtown.org" <rpingar@westtown.org>
Cc: "McCune, Chris" <cmccune@wcasd.k12.pa.us>, "Bevilacqua, Gary J" <gary_bevilacqua@vanguard.com>, "Cherashore, Linda P." <lcherashore@wcasd.k12.pa.us>
Subject: Party status for Crebilly Hearing

Rob,

Attached is the resolution passed by our school board last year regarding a request for party status with the Crebilly Farms hearing. I am requesting to be approved for party status with the upcoming hearings. The two people designated by our school board to speak on behalf of the board are Gary Bevilacqua, board member; and Jim Scanlon, Superintendent.

Regards,

Jim

Dr. James R. Scanlon

Superintendent, West Chester Area School District

782 Springdale Drive,

Exton PA 19341

484-266-1090 – office

484-883-0648 - cell



WEST CHESTER AREA SCHOOL DISTRICT

Educating and inspiring students to achieve their personal best

Dr. James R. Scanlon, Superintendent of Schools

Emailed to: rpingar@westtown.org
and
Hand delivered to: Westtown Board of Supervisors
Conditional Use Hearing
Wed. March 29th, Rustin HS, 6 pm

March 29, 2017

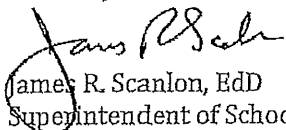
Mr. Robert Pingar
Township Manager
Westtown Township
1039 Wilmington Pike
West Chester PA 19382

Dear Mr. Pingar,

The West Chester Area School District Board of School Directors officially adopted the attached resolution on Monday, March 27, 2017. Board member Gary Bevilacqua and I have been authorized to provide testimony and public comment on behalf of the District at public meetings and hearings with Westtown Township on the proposed Crebilly Farm development. We respectfully request that the West Chester Area SD be granted party status.

District testimony will include a request for an annual impact fee of \$645,000 to be paid to the district for not less than five years. Further, the analysis in the memorandum dated January 25, 2017 will serve as the talking points and position for any testimony or public comments on behalf of the District. This analysis is also attached.

Sincerely,


James R. Scanlon, EdD
Superintendent of Schools

Attachment

**BOARD OF SCHOOL DIRECTORS OF THE
WEST CHESTER AREA SCHOOL DISTRICT**

RESOLUTION

March 27, 2017

WHEREAS, West Chester Area School District (the "District") is a municipal corporation and public entity formed by and for the communities of East Bradford Township, East Goshen Township, West Chester Borough, West Goshen Township, Thornbury Township, Westtown Township, and West Whiteland Township in Chester County and Thornbury Township in Delaware County operating under the Commonwealth of Pennsylvania's Public School Code of 1949, as amended from time to time;

WHEREAS, the Westtown Township (the "Township") Board of Supervisors is considering approval of a plan to develop the Crebilly Farm property located along Wilmington Pike bounded by West Pleasant Grove Road to the north, South New Street to the west and Street Road to the south;

WHEREAS, TOLL PA XVIII, L.P. has proposed the development of 317 homes on the property;

WHEREAS, the impact of this development will be significant on the West Chester Area School District;

WHEREAS, the superintendent submitted an analysis to the Township on January 25, 2017 regarding the impact of the proposed development on the District;

WHEREAS, the estimated District expense generated from this development is estimated to be in excess of \$2.4 million;

WHEREAS, the estimated District revenue generated from this development is estimated to be approximately \$1.8 million;

WHEREAS, the District has requested party status from the Township for the Township hearings relative to the Crebilly Farm proposed development; and

WHEREAS, the Board wishes to authorize certain elected officials and personnel to present its position on the development, consistent with the January 25, 2017 memorandum, as testimony and public comment to the Township at public meetings and hearings.

NOW THEREFORE, LET IT BE RESOLVED that WE, the Board of School Directors of the West Chester Area School District, hereby authorize Superintendent Dr. Jim Scanlon and Board member Gary Bevilacqua to provide testimony and public comment on behalf of the District at public meetings and hearings with Westtown Township on the proposed Crebilly Farm development, and that the testimony include a request for an annual impact fee of \$645,000 be paid to the district for not less than five years.

THEREFORE LET IT FURTHER BE RESOLVED, that information and analysis in the memorandum dated January 25, 2017 will serve as the talking points and position for any testimony or public comments on behalf of the District.

THEREFORE LET IT BE FURTHER RESOLVED, that all actions taken by individuals acting on behalf of the District prior to the date of this Resolution in furtherance of obtaining party status and presenting the position set forth in the January 25, 2017 memorandum and in furtherance of other District's business in this regard are hereby ratified and confirmed.

Adopted this 27th day of March 2017.

ATTEST:

BOARD OF SCHOOL DIRECTORS OF THE
WEST CHESTER AREA SCHOOL DISTRICT

Linda Cherashore
Linda Cherashore
Board Secretary

By: *Chris McCune*
Chris McCune
President

WC WEST CHESTER AREA SCHOOL DISTRICT
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Dr. James R. Scanlon, Superintendent of Schools

TO: Todd J. Poole
FROM: Jim Scanlon, Superintendent West Chester Area School District
RE: Impact on the West Chester Area School District of a Complete Build Out at Crebilly Farms
DATE: January 25, 2017

I am responding to your request of the estimated cost and impact of a complete build out of the Crebilly farm site being proposed by Toll Brothers. The estimates are based on the numbers you have provided me with the assumption that Toll will construct 317 homes:

Elementary (K-5): 105
Middle School (6-8): 38
High School (9-12): 30

Special Needs Students: 21

Total Students: 172

I would estimate the expenses to the school district to be between \$2.3 million and \$2.4 million. Sustainable revenue generated from this development is estimated to be \$1.8 million.

With 21 students requiring special education services and 151 requiring regular education services, I consulted with our Business Department to estimate costs to the school district. The state of Pa does not recognize a per pupil cost by district but it does recognize a tuition rate to reimburse charter schools. The tuition rate for a regular education student is approximately \$11,762, and \$29,727 for each special education student. Using this as a reference point, the cost to the district will be approximately \$2.4 million.

21 x \$29,727 = \$624,267
151 x 11,762 = \$1,776,062
TOTAL: \$2,400,329

Starkweather Elementary School will be impacted the greatest. We may need an additional teacher at each grade level (6 teachers). This will require the school district to purchase 3-4 modular classrooms to accommodate the growth. It has a building capacity of 550 students, but currently is using three modular classrooms to expand capacity to 625. Its current enrollment is 583. With 105 new students, its enrollment will grow to 688. Depending on what grade level the children fall, we could be looking at 3-4 additional classrooms.

Statson Middle School has a capacity of 965 students, so it may not be able to accommodate the additional 38 students. It has a current enrollment of 973 students so it is already scheduled beyond capacity. With 38 more students it will go over capacity it may need 1-2 modular classrooms because the capacity will be exceeded by 46 students, or the equivalent of two sections. We may be able to accommodate those students on the core team of teachers (math, science, English, social studies), but the electives will require additional space, most likely one or two modular classrooms.

Rustin High School has a capacity of 1350 and should be able to accommodate the additional students. Its current enrollment is 1286.

The school district completed a demographic study in 2014 to estimate enrollment projections and growth. This data was used to redistrict students. That study can be found at http://home.wcasd.net/files/0JKkM/b52f6b9733f854f73745a49013852ec4/Report_3-1_Final_WCASD_5.8.2014.pdf

We redistricted approximately 526 students to accommodate growth as outlined in our demographic study conducted in 2014: 342 elementary, 76 middle and 108 high school, primarily out of Starkweather, Stetson and Rustin to other schools in the district. I have attached a copy of that final report approved by our school board in December, 2014. Barring any other large developments in the area, we are projecting enrollment to begin to decline in 2021 at Stetson and Starkweather.

If we cost out the 172 students by looking at specific costs, I would estimate the following:

Construction of four classrooms at Starkweather Elementary School -	\$1,300,000 (\$325,000 x 4)
Lease of two modular classrooms at Stetson -	\$240,000 (30,000 x 4 years)
Six teachers at Starkweather - (\$77,000 salary and benefits x 6)	\$462,000
One additional Full Time equivalent Teacher at Stetson	\$77,000
Two buses -	\$100,000 (2x \$50,000)
Three aides for special education students -	\$90,000 (\$30,000 x 3)
Utilities -	\$4,000
School supplies for 172 students -	\$51,600 (\$300 x 172)
TOTAL:	\$2,324,600

The sustainable revenue generated from this development is estimated to be \$1,592,782. With 317 single family and carriage homes at an average assessed value of \$250,000 (250,000 x 317 x .0200982)

The median household income in our school district is approximately \$102,141. This would generate approximately \$161,893 in Earned Income Tax (102,141 x 317 x .01 / 2) for the school district.

In summary, the net financial impact would be estimated at:

Expenses:	\$2,400,329
Revenue generated:	\$1,754,675
TOTAL:	(645,654)

This is an analysis of just the Crebilly Development. It does not take into consideration of another Toll Brother's development going through land development process in East Bradford Twp. While that development is smaller and consists of 76 homes, it is located in the Starkweather/Stetson/Rustin feeder pattern, which will increase the numbers I have provided in this analysis of the Crebilly property.

While the township only needs to be concerned about approval of development in its boundaries, the school district must consider development in eight municipalities. I believe your estimated number of students generated from this development is low. For each regular education student coming from the development, we can add an additional expense of \$11,762, and for each special needs child we can add an additional \$29,727.

PC: WCASD School Board
WCASD Central Office Cabinet
Dr. Mike Marano, Principal, Rustin HS
Dr. Charles Cognato, Principal, Stetson Middle School
Mr. John Meanix, Principal, Starkweather Elementary School