

**RIEGLSVILLE**  
**Tax & Education**  
**COALITION**

July 31, 2007

M. Patricia Fullerton, Esquire  
Assistant Chief Counsel  
Department of Education  
333 Market Street  
Harrisburg, PA 17126-0333

Re: RTEC Rebuttal of Palisades and Easton School District Submissions  
No. 0702132 (Bucks County)

Dear Ms. Fullerton:

By direction of Secretary Zahorchak's letter from May 4, 2007, we are submitting to you our rebuttal of the Easton and Palisades School District's submission to the State's questionnaire.

Virtually all of the responses from the districts focus on financial impacts, which, as you will see by our comments, we feel are overstated. Neither district recognizes the reality that the Palisades School District already occupies half of the landmass of our tiny borough. Although this territory is now largely vacant, it is certainly within the sphere of imminent development. This reality points to a social cleavage in this small community that must be avoided. The residents of Riegelsville want to mitigate this type of social disruption now and avoid exacerbating it in the future.

It is this long range human concern that transcends the rather mechanical and short term financial approach to this serious problem that the districts put forth in opposition to a plan that the vast majority of the residents of the Riegelsville community support as indicated by the number of persons who put their name to the petition that began this process. We urge you not to lose sight of that truth and why those many persons desire this change for the better.

We thank you for your time and consideration of our petition to switch districts. We realize that the decision requires a great effort to review all the pertinent information. Understandably the status quo is often the easiest choice to make, but sometimes the easiest choice is not the right one. To us, the community of Riegelsville, this transfer ensures what is best for our borough and its children. We hope you will help to bring our entire borough under one school district that provides an excellent education within the community we live.

Respectfully yours,

Michael Graeff, President

Enclosures

cc: Alan B. McFall, Esquire  
Charles N. Sweet, Esquire

## RTEC's COMMENTS ON PSD's IMPACT REPORT

With disappointment RTEC read PSD's impact report. It was clear that the district's main concerns regarding Riegelsville students joining PSD were based solely on inflated financial concerns.

PSD should not forget that along with our students come our tax dollars that will more than pay for many of the transferring costs.

*Palisades put down the secession measure in May by a 7-2 vote. Board member Stephen Kunkel said he voted in favor of annexing Riegelsville because he felt the board was being overly cautious. "I feel that, intrinsically, the proposal makes sense, that Riegelsville is more closely aligned with the Palisades area. Our kids all interact in local sports and stuff," he said.....The Express-Times June 28, 2007.*

- **EDUCATIONAL JUSTIFICATIONS**

PSD claims the Riegelsville petitioners did not give any educational justifications for transferring districts. Through several meetings and presentations to both the school board and Superintendent Dr. Francis Barnes, RTEC clearly explained Riegelsville's desire to join the Palisades School District and gave both written and verbal reasons about the educational benefits our children would receive by such a move.

- **STUDENTS WITH SPECIAL NEEDS**

RTEC notes the clear financial objections that Palisades has shown in describing the burdens they would have to face to educate students with special needs.

The district seems to be overly sensitive to the special education students from Riegelsville. Even with financial objections, the district states in their report that the IU students would not negatively impact their IU programs. They also state that the learning support students would not significantly impact classes at the middle or high school. The district does speculate that there may be a "possible" need to add a .5 learning support teacher at the elementary level, and this would in fact improve current services at Durham-Nockamixon by lowering the teacher-student ratio. Although there might be a slight increase in supervisory work for Pupil Services/Special Education, the district did not anticipate a recognizable increase or difference after all was settled in the transfer. Although PSD exaggerated the financial costs that the Riegelsville students would cost their district, RTEC could find no evidence in the report that these students (special education and regular education students) could not be absorbed into their district with little to no impact.

- **DURHAM-NOCKAMIXON or SPRINGFIELD ELEMENTARY?**

Two elementary schools are mentioned at different times in the PSD submission. Durham-Nockamixon Elementary is the closest elementary school geographically to Riegelsville Borough. Springfield Elementary is located in the North-West region of the school district. While reporting on the enrollment numbers for the 5<sup>th</sup> grade for the 2007-2008 school year, the district noted Riegelsville students attending Springfield

Elementary. They later noted special education students attending Durham – Nockamixon Elementary. This is confusing information.

It appears that PSD fluctuated between two schools using the school that best fit their objection to Riegelsville joining their district. At first, Springfield Elementary was used, claiming to need additional staffing to accommodate Riegelsville’s seven 5<sup>th</sup> graders. PSD data shows the district currently has two classes of 30 and 31 students. It appears that this school is already operating at an undesirable number of students per class. With the addition of our seven students and the hiring of a new teacher, it would actually improve the current services to students by dramatically reducing class size (22-23 students) and allowing more individualized attention.

Upon further research RTEC found that the school has received a class size reduction grant and will already be addressing their numbers problem in the 5<sup>th</sup> grade by adding a teacher to teach the major subjects of math and English.

RTEC is not aware of any negative effect on enrollment should the Riegelsville students attend Durham-Nockamixon Elementary. Since there was no mention of this option in PSD’s report, RTEC called the district for clarification. Assistant Superintendent, Ms. Miller, told RTEC that she recalled that enrollment numbers at Durham-Nockamixon were not a problem. She explained that the transportation department would bus the children based on their home locations to either Durham-Nockamixon or Springfield. The director of transportation confirmed that all the elementary students from Riegelsville should be bused to Durham-Nockamixon and not Springfield based on their geographic location.

- SOPHOMORE ENGLISH

Another concern for PSD was Sophomore English. They noted classes with 28 students. Riegelsville only has three sophomores. These students could be easily spread into each of their English classes.

- TRANSPORTATION

Transportation is one of the largest concerns for PSD. Upon a closer look, costs seem to be highly inflated as well. The district states that they would incur costs familiarizing themselves with our borough, yet they already have regular bus routes that run right through the middle of Riegelsville. Two of the private schools they would provide transportation to (St. John the Baptist School in Ottsville and The River Valley School in Upper Black Eddie) already lie inside the boundaries of PSD. There are several route that can be taken from our borough to their schools, not just along the river.

The costs PSD claims to be necessary to send Riegelsville students to Springfield Elementary are unjustified. Upon clarification the district has stated that our students should attend Durham-Nockamixon.

The district seems to be treating Riegelsville as its own entity requiring separate busses for our students and not incorporating the runs that already travel just ½ mile down the road. RTEC points to the fact that half of the land in Riegelsville Borough already lies within the PSD.

Palisades has claimed that adding Riegelsville to their boundaries will include 14 additional private schools they would have to provide bus service for under act #372. Our territory adds only a ½ mile to their Eastern border and does not go any farther north than where their boundary currently ends on Spring Hill Road. Upon looking at the 14 private schools in question, not one was added to their territory that was not already within their 10 mile radius. RTEC used the northern most boundary of Riegelsville which is also the north eastern point of the Palisades school district (intersection of 611 and Spring Hill Road). Projected costs for “*additional schools to which PSD may be required to provide transportation under act #372*” seems intentionally inflated and should be reevaluated.

We calculated the distance to all 14 schools that PSD listed. Two are already serviced by the school district. We used two locations in Riegelsville. Location #1 is 200 Spring Hill Road which is the intersection point of PSD territory and the Easton half of our borough. We found that several schools in Easton are already within 10 miles of the PSD boundary and have noted this below. Location #2 is 10 Delaware Ave which is the Eastern edge of Riegelsville Borough and the location of the bridge leading to NJ.

<i>School</i>	<i>Address</i>	<i>Distance</i>	<i>Added Bussing?</i>
St. James School	430 S. Main Street Phillipsburg, NJ	10.13 mi	NO
Easton Catholic Elementary School	841 Washington Street Easton , PA	8.42	Already in PSD Territory to bus
Phillipsburg Christian Academy	300 Cromwell Street Phillipsburg, NJ	10.5 mi 11.2 mi	NO
Easton Baptist School	No information found		
St. Anthony’s School	Part of Easton Catholic		
St. Joseph’s School	5040 St. Joseph’s Rd Coopersburg, PA	20.57 mi	NO
Rock Christian Academy	5 South 5 <sup>th</sup> Street Easton, PA	8.35 mi	Already within PSD territory to bus
St. Jane Frances de Chantal School	1900 Washington Blvd Easton, PA	9.55 mi	Already within PSD territory to bus
Bethlehem Area AVTS	3300 Chester Ave Bethlehem, PA	14.92 mi	NO
Career Institute of America	5335 Kesslersville Rd Easton, PA	14.32 mi	NO
Vitalistic Therapeutic School	902 4 <sup>th</sup> Ave Bethlehem, PA	13.9 mi	NO
LVPA	675 E Broad Street Bethlehem, PA	12.13 mi	NO

Bethlehem Catholic	2133 Madison Ave Allentown, PA	14 mi	NO and PSD already busses
Allentown Central Catholic HS	301 N. 4 <sup>th</sup> Street Allentown, PA	20.92 mi	NO and PSD already busses

- TUTORING COSTS

PSD has estimated \$5,000 to provide tutoring for students who are behind in certain academic areas. This service is not provided for any other transfer student and should not be considered an expense for this situation. In fact, this is an opportune time for high school students to change districts, as PSD is implementing a new math program and will need to address holes their current students have. The Riegelsville students will have an easier transition than the PSD students as they will remain in a traditional math curriculum where the PSD students will be changing from a reform curriculum to traditional.

- UNCONFIRMED or QUESTIONABLE COSTS

Based on the above reasoning and responses from the PSD’s report, RTEC has found their projected increases in expenditures due to the transfer to be highly exaggerated or questionable.

PSD noted that three non special education students from Riegelsville were attending alternative schools and estimated the cost for educating these students to be \$48,000. Mr. Gladfelter from PSD could not confirm this information. He informed RTEC that the information was received from the EASD’s transportation department via a phone conversation and not from district officials. EASD reported no children in alternative education programs on their report except for two IU students in autistic and emotional support classes.

Later in PSD’s report two “alternative school placements” are noted on a special education financial chart at a cost of \$32,400. This information is confusing as the IU students are already noted on the chart. RTEC is unsure which two students PSD are referencing.

There seems to be a fairly large discrepancy between EASD and PSD’s cost for educating their IU students. EASD notes the cost for an autistic IU student to be \$20,000 per year and PSD estimates the cost at \$52,545. EASD estimates the cost of educating an emotionally disturbed IU student to be \$15,000 and PSD estimates the cost at \$28,385. PSD also notes program unit costs and EASD does not. Perhaps PSD has not subtracted any state funding they receive for educating these students.

PSD noted an anticipated 5% increase in related services. This seems to be greatly inflated. Only two Riegelsville students in learning support are receiving support services. One student receives speech/language services. The other student receives speech and OT services. The only other student receiving support services is an IU

autistic support student. He/she receives OT, PT and speech/language services. RTEC believes PSD has already noted these costs on their IU budget.

Clearly, the hiring of another teacher for Springfield Elementary is not an accurate cost (\$62,654.34) and should be removed from anticipated costs.

As stated before, tutoring for gaps in the program (\$5000) is an unprecedented expense.

The transportation expenses are overestimated, especially based on busing three special needs students separately when we know of only two students who need separate bussing. These two students might even be able to be bussed together if they will attend the IU classes at the same school.

Possible hearing procedures for 2 special education students is speculation only. \$10,000 should be removed from projected costs. RTEC also feels that adding a cost of \$10,000 to students simply because of their classification seems highly discriminatory.

- HAYCOCK TOWNSHIP

A small group of resident of Haycock Township were looking into the possibility of succeeding from Quakertown SD to PSD. Their reasoning was based on tax savings. This transfer would include an elementary school building and 300 students. Quakertown has plans to renovate the building and this group is no longer looking into transferring districts. We are attaching a letter written by the defacto leader of this group indicating that they are not looking to transfer to the Palisades School District as Palisades mentioned in both their cover letter and questionnaire submission.

## RTEC's COMMENTS ON EASD's IMPACT REPORT

Overall RTEC finds EASD's responses on their impact statement to be vague. It does appear that Riegelsville's transfer would have little to no impact on EASD.

Easton misreported the results of their school board vote. The actual vote to approve the Riegelsville Petition to allow the transfer of students to the Palisades School District was 3-5.

Upon roll call, the vote resulted as follows:

Ayes: Mr. Gerheart, Mr. Mahl, and Dr. Vulcano – (3)

Nays: Mr. Cortez, Ms. Fisher, Mrs. Millen-Eustis, Mr. Reilly, and Mr. Siegfried – (5)

- TAXES

EASD notes that taxes equalized between Bucks and Northampton county residents is not supported by the tax rate assessments presented in the attachments of Bucks 139.574 versus Northampton 45.105.

Please see our attachment regarding Easton's debt service and the anticipated revenue Palisades will receive from Riegelsville tax dollars.

- PARENT SURVEY

EASD sent out survey cards to families with students in Riegelsville whom would be affected by the transfer and asked if those parents would be in favor of the transfer. RTEC feels the survey is not valid because all EASD K-12 families that reside in Riegelsville were not sent the survey. Only 48 families that currently have children enrolled in EASD schools were sent cards. Of these families only 29 (60%) responded.

EASD was negligent and did not include all affected Riegelsville families. Families with children whom attend private schools were excluded from the survey. It is clear that the transfer would directly affect those families and their children as well. EASD does have the information to contact the families of the 90 students they bus, yet chose to contact only the students enrolled at Easton. RTEC feels that all families attending private schools would be in favor of the transfer. We would also like to highlight that of the families who responded to the survey, almost 50% of the families chose to leave the school district. This number would clearly have gone up if the other families were given surveys to participate.

- TRAVEL DISTANCES AND CONDITIONS

EASD did not mention the distance between Riegelsville and Shawnee Middle School. It is the furthest distance by far for Riegelsville students to travel (11.4 miles).

Although by necessity, the residents of Riegelsville are accustomed and to driving somewhat long distances for everyday living, those in Easton are not. Route 611 North from Riegelsville to Easton is extremely hazardous. This road follows the river with cliffs on one side and the canal on the other with no shoulder on either side. Traveling

between cliffs and a river is dangerous even in good weather conditions, but becomes perilous during snow and rain and impassable during our frequent floods. It is no wonder that parents of children in the city of Easton refuse to bring their children to our town for social engagements.

- TRANSPORTATION COSTS

The change in transportation clearly would be a huge savings to EASD in fuel and bus mileage. Eight buses are currently dispatched to Riegelsville on any given school day. The district failed to report any monetary amounts for this savings.

- RACIAL DIVERSITY

It is incongruent that removing 26 Caucasian children from 522 students at Cheston Elementary School would have an effect on racial diversity. In August 2007, seven of these students will have already moved on to the middle school. Less than 5% of the students would be transferring.

## SUMMARY

The philosophy of a quality education, especially at the primary level, is for a school to be an extension of family and community and all three should be working together to educate the child. A learning center that is closer to home and closer to the other students in a peer group promotes social interaction and connection among and between children. Riegelsville's neighbors are part of PSD district. They are also part of the Riegelsville community.

Relationships are built in early years with much parental involvement. These relationships would be far easier to foster with children attending a closer school that already draws from Riegelsville's community members and neighbors.

Schools are supposed to provide a physiological and social center for children as well as an educational system. Those important social benefits, beside basic educational tasks, is what a school system should be all about. Today the connection or relationship between Riegelsville and EASD seems peculiar and curious. The argument that it is right and good to stay in the EASD just because residents have done so in the past is not a very compelling one.

Riegelsville is also a very small geographic area that is divided between two school districts: EASD and PSD. It should be noted again that about one half of the territory of Riegelsville Borough is already in PSD. The potential would be great for creating a huge social and economical divide in our very small borough by having some residents in the borough send their children to schools that are disassociated from the Riegelsville community and others send their children to schools that have many community ties. The PSD homeowners also have the added benefit of paying a lower tax rate because they are not being penalized by the bi-county STEB formula. This inequitable schism is very real. Already there are some residents in our small borough who belong to PSD. This will only increase as development of the PSD section of Riegelsville ensues.

Giving the children of Riegelsville the opportunity to attend a school that reflects their community and unites all the properties in Riegelsville into one school district are RTEC's educational focus.

Although there is a great injustice with the STEB formula taxing Riegelsville residents at a grossly higher rate than their Northampton counterparts in the EASD, RTEC realizes this is more of a financial factor rather than an educational factor. RTEC would like to point out that both PSD and EASD's impact statements seem to be hyper-focused on the financial factors when discussing the impact a transfer would have on their district.