

**EXHIBIT 3**

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**BEFORE THE MARYLAND OFFICE OF ADMINISTRATIVE HEARINGS**

**HARRISON W., ET AL**

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**Appellants**

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**v.**

**OAH CASE NO.: MSDE-BE-16-16-02815**

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**BOARD OF EDUCATION OF**

\*

**CARROLL COUNTY**

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**AFFIDAVIT OF THE HONORABLE RYAN WARNER**

I, Ryan Warner, Mayor of Manchester, solemnly affirm under the penalties of perjury that the contents of this affidavit are true and correct to the best of my knowledge, information, and belief:

1. I am currently the Mayor of Manchester and have served in this capacity since 2011.
2. I began serving the residents of Carroll County, specifically those residing in the Manchester area in 1998. I served on the Carroll County Republican State Central Committee from 1998 to 2002; I was a member of the Manchester Planning and Zoning Commission and served on the Town Council from 1999 until 2011. In 2003 I became the Council Vice-President and served in that capacity until 2011. In 2014 and 2015, I served on the Manchester Valley High School Advisory Council.
3. I currently have children who attend Manchester Valley and who will be attending the school in the future.

4. As the elected mayor of Manchester, I am the spokesperson for the Town of Manchester and the issues which impact the community such as the closing of North Carroll High School and its consolidation with Manchester Valley.

5. Manchester is directly impacted by CCPS' decision uniquely from the rest of Carroll County and the public at large. Its citizens' children attend or will attend these high schools, their recreation programs take place at these schools, community events are focused around the schools, and they drive in the traffic which flows to and from these schools.

6. On behalf of myself and the Town of Manchester, I have provided public comment to the CCPS against the closures.

7. My standing on this issue also arises from the coordination and use of North Carroll and my position as the elected spokesmen for the constituents of Manchester who are distinctly impacted by CCPS' decision. Among other obligations, I am tasked with ensuring that my constituents are safe, that the needs of the residents are being met, that they are being reasonably taxed for the services provided, and that the town continues to successfully grow socially and economically.

8. Consistent with the concerns noted above for the students and their parents based on CCPS' decision, I was not consulted about the possibility of incorporating the whole of North Carroll's student body into Manchester Valley. Based on the numbers projected by CCPS, not only will Manchester Valley be over capacity for the duration of the school's current projections which causes safety and fire concerns, jeopardizes the use of the school's facilities and sewer and water usage, it creates the possible obligation to hire additional police, and impacts new housing development in the area.

9. Based on my understanding, there has been zero consideration given to the impact of this relocation to development in the town or to traffic which Manchester and its residents will now have to suffer through during the school year.

10. As has been confirmed by discovery received from CCPS, CCPS undertook no analysis of the increased traffic at Manchester Valley as over 700 new high school students would now be sent there. What makes this absence of review so egregious is the fact that CCPS undertook a different approach under its previous leadership and had the foresight to undertake a review of traffic patterns prior to building Manchester Valley.

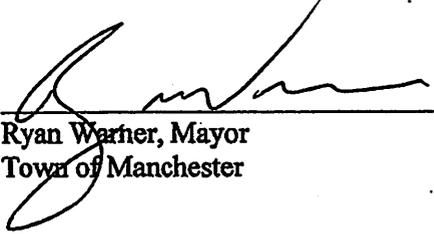
11. In addition to the increase in capacity at the school having an immediate and grossly negative impact on traffic in the area, parking and the need for increased traffic police presence, this decision has a direct impact on the approval of new development in and around Manchester. Per the Town's code, the capacity ratings which CCPS' decision identified for Manchester Valley may prevent the Planning and Zoning Commissioners from approving developers seeking to build new homes and developments. This directly impacts the Town of Manchester and its tax base and deprives the School system of needed student population growth. Manchester currently has developments of 140 homes in different stages of planning and development which will directly impact infrastructure needs as well as the enrollment numbers of Manchester Valley as well.

12. In addition to these planned developments, the County's Buildable Land Inventory which outlined development possibilities throughout Manchester. This County document, which is expressly prepared for planning purposes, identified an overwhelming amount of land available for development in these areas all of which may now be built since the

building moratoriums imposed on the Towns by the County for the past six years have been lifted.

13. On behalf of myself and the Town of Manchester, I have also provided public comments to the CCPS against the closure. Attached is one such email joined by the County's mayors.

Date: 3-18-2016

  
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Ryan Warner, Mayor  
Town of Manchester