



Superintendent
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October 28, 2024

Via Email

TDHCA, Multifamily Finance Division
P.O. Box 13941
Austin, Texas 78711-3941
Attn: Teresa Morales, Director of Multifamily Bonds
teresa.morales@tdhca.texas.gov

Re: Objections to the Affordable Rental Housing Application Proposed in Comal ISD

Dear Ms. Morales,

This letter is sent in response to a “Notification of Affordable Rental Housing Application(s) Proposed in Your District,” dated July 31, 2024. As the Superintendent of Schools of the Comal Independent School District (the “District” or “Comal ISD”), I am writing to express my concerns and objections with the potential development of the Creek Bend Apartment Homes, Development Number 24478 (“Housing Development”) in Comal ISD near Pieper High School, Pieper Ranch Middle School, and Kinder Ranch Elementary School, as outlined below.

Transportation and Safety Concerns

Due to the challenges in recruiting and retaining enough bus drivers to maintain the number of bus routes to service all morning and afternoon routes, the District has implemented No Service Zones (NSZ). These NSZs are areas where Comal ISD bus transportation services are not provided, and they extend to a two-mile radius around each campus. The proposed Housing Development falls within one of these NSZs, meaning that no District bus services would be available to these students and the families must find an alternative means to transport their children to and from school.

I understand that the applicant may coordinate with VIA on a VIA bus stop at the Housing Development. To the extent that public VIA Metropolitan Transit buses may be used to transport students to and from school, I have significant safety and traffic concerns. First, students would be placed on public transit buses, potentially by themselves, with adult strangers. This could potentially put these students at risk while being transported to and from school.

In addition, allowing public transit buses to transport said students would likely create increased traffic and safety concerns on District property by congesting student drop-off and pick-up areas. I urge the TDHCA

board to require the applicant to provide a solution for the transportation of students that does not create a safety risk or traffic concerns, as the proposed Housing Development is in the District's No Service Zone.

Tax and Financial Concerns

To the extent the Housing Development has any negative impact on taxes and revenue to the school district, including, but not limited to, any property tax exemption as to school district taxes, I oppose the proposed Housing Development. If the Housing Development has a property tax exemption, there will be reduced revenue to the District while increasing the number of students to be served by the District.

Thank you for your consideration,

A handwritten signature in blue ink, appearing to read "John E. Chapman III", with a long horizontal flourish extending to the right.

Dr. John E. Chapman III
Superintendent of Schools