



September 26, 2013

Lillian M. Lowery, Ed.D.  
State Superintendent of Schools  
MD State Department of Education  
Nancy S. Grasmick Building  
200 West Baltimore Street  
Baltimore, MD 21201-2595

RE: Proposed Emergency Shelter Compliance Process

Dear Superintendent Lowery,

The Maryland Association of Counties (MACo) has reviewed proposed regulations regarding emergency shelter provisions for future public school construction projects. In general, we share the practical concerns that have been raised directly by several county emergency management offices through the Commission's comment phase.

In raising these concerns, we do not wish to minimize the merits of emergency planning as part of facility design and improvement. Rather, we believe that a broader process, more connected with the ongoing emergency and event planning efforts at the local level, would serve these goals better than the current narrow proposal. Requiring local education agencies to coordinate only through the areas designated by the Maryland Emergency Management Administration would overlook the extended cooperative work happening currently across county agencies, facility planners, and officials at multiple levels of government.

MACo and our county government professionals who guide emergency planning urge that local plans and collaborations not be omitted from any new state guidance or regulations regarding school facilities. Counties stand ready to work with the

Commission or other stakeholders to reach assurances that our children and communities are best served in this regard.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Sanderson". The signature is fluid and cursive, with a large initial "M" and a long, sweeping tail.

Michael Sanderson

Executive Director

Maryland Association of Counties

Cc: Mr. David Lever, Executive Director, Public School Construction Program  
Mr. John Woolums, Director of Governmental Relations, MABE  
Dr. Carl Roberts, Executive Director, PSSAM  
The Honorable Rick Pollitt, Wicomico County Executive, MACo President