

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
WESTERN DIVISION**

LITTLE ROCK SCHOOL DISTRICT

PLAINTIFF

V.

NO. 4:82CV00866BSM/HDY

**PULASKI COUNTY SPECIAL SCHOOL
DISTRICT NO. 1, ET AL.**

DEFENDANTS

MRS. LORENE JOSHUA, ET AL.

INTERVENORS

KATHERINE KNIGHT, ET AL.

INTERVENORS

**BRIEF IN SUPPORT OF PULASKI COUNTY SPECIAL SCHOOL DISTRICT'S
MOTION FOR COURT APPROVAL OF CONSTRUCTION, RECONSTRUCTION,
SCHOOL CONSOLIDATION AND SCHOOL REPLACEMENT**

Introduction

The Pulaski County Special School District ("PCSSD") has conducted a series of community forums calculated to obtain comments and feedback concerning the broad outline of its plan to implement Vision 2020, an ambitious plan for replacement and revitalization of several of its campuses. The particulars of Vision 2020 as they have been refined are set out infra.

The PCSSD is simultaneously pursuing approval for the same construction projects, as well as the financing for them, from the Arkansas State Board of Education. The project cannot proceed unless or until this Court and the State Board of Education approve the construction.

Vision 2020 does not involve the closing of any school located in a predominantly African-American area. Rather, schools located in such areas are involved in the reconstruction and upgrade plans and will gain capacity as a result of Vision 2020.

Plan 2000

Section H. School facilities. Plan 2000 provides at Section (3) that:

PCSSD shall notify the Joshua Intervenors of plans for constructing new schools and for adding capacity to existing schools. The notice shall identify the capacity of the proposed facility, the area of the system to be served, and the projected impact on the racial make-up of the students in each school expected to be affected by the new construction. The Joshua Intervenors shall have a period of 14 days in which to provide input concerning each such proposal.

The Notice required by Section H (3) was submitted to the Joshua Intervenors on Monday, March 7, 2011. PCSSD received no written comments to the Notice. The Notice Letter is attached to our Motion as Exhibit 1.

The Vision 2020 Forums

The forums were conducted on the following dates at these individual sites:

January 18, 2011 at College Station Elementary School

January 20, 2011 at Robinson High School

January 24, 2011 at Jacksonville Community Center

January 25, 2011 at Scott Elementary School

January 27, 2011 at Harris Elementary School

January 31, 2011 at Jacksonville High School

February 1, 2011 at Robinson Middle School

February 3, 2011 at North Pulaski High School.

The Particulars of Vision 2020

1. Harris Elementary School

The existing facility will be upgraded to update its exterior to enhance its curb appeal. Additions and alterations will be provided to meet the academic requirements of the school which will continue to operate as a grade K-5 school. The plans do not currently include increasing the capacity of Harris, which already has excess capacity, but a centralized circulation area will be added.

While no students would be moved from Harris, it is hoped that these updates might increase the number of both African American and other students who select Harris for elementary school.

2. College Station Elementary School

College Station would be updated to provide a more contemporary appearance to enhance its visual appeal and attractiveness. The capacity of College Station would be increased by converting the current media center to classrooms. A new media center and centralized circulation area will be constructed.

The conversion of the media center should increase the capacity of College Station by approximately 50 students.

3. Scott Elementary

The Scott facility will be upgraded by enhancing the exterior of the building to make it more modern looking. The old junior high school which has been closed for decades would be demolished. The elementary school would continue to serve grades K-6. The capacity would be increased by approximately 50 students by converting the existing media center and office back to classrooms. A new centralized circulation area and new media center will be constructed.

4. Jacksonville Elementary

Jacksonville Elementary would likely be combined with Dupree Elementary School (or perhaps an elementary school other than Dupree), and the existing buildings would be replaced. The new school would be built on property already owned by the PCSSD. The new elementary school would serve grades K-5 and would be designed for approximately 650 students.

5. Arnold Drive and Tolleson

Arnold Drive, which is located on the Little Rock Air Force Base, and Tolleson Elementary School located just outside the Little Rock Air Force Base property, would be combined in a new facility. The United States Air Force has indicated its willingness to provide a site for the new elementary school on base property lying just outside the fenced perimeter. The property anticipated to be provided is across the street from the current North Pulaski High School.

The combined new elementary school would continue to serve grades K-5 and would be designed to house up to 750 students.

6. Jacksonville Middle

A new Jacksonville Middle School would be constructed to replace the current facility and would serve grades 6-8. The new building would be located upon the current site occupied by Star Academy which is part of the same campus and acreage upon which the Jacksonville Middle School currently stands. This school would be built to accommodate up to 1000 students.

7. Robinson Middle

Robinson Middle School would be upgraded to modernize its façade and would continue to serve grades 6-8. Part of the building will be demolished and rebuilt. Barriers will be removed to make the campus ADA and national fire code compliant.

No final determinations have been made regarding housing the student body while the renovations are ongoing. However, the current expectation is that the students displaced from time to time can be taught on the same campus in modular buildings. Alternate possibilities include housing the 6th grade at Robinson Elementary School and 7th and 8th grade at Robinson High School. All of the Robinson schools are on the same general campus.

The renovated Robinson Middle School would house up to 730 students.

Racial Impact Upon Student Bodies

For most of the schools, the existing zones would not change and therefore the upgrade or replacement of the school should not affect current racial balance outcomes except to the extent that the improvements attract new students. For schools that will be combined, it is currently anticipated that their existing zones would be combined as well and that the resultant school would reflect the consolidated student bodies. Again, it is hoped that building new facilities will attract students new to the District or students from private or charter schools.

The Jacksonville Elementary student body must be redistributed while the school is being updated or replaced. Those reassignments whether temporary or permanent, will be done in a desegregative fashion. The proposed temporary reassignments for those attendance geocodes feeding Jacksonville Elementary are depicted in Exhibit B to our motion. The racial balance effects are de-minimis.

Conclusion

The Pulaski County Special School District prays for an order approving the implementation of Vision 2020 as described herein.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2011, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which shall send notification of such filing to the following:

- **Mark Terry Burnette**
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/s/ M. Samuel Jones, III

I hereby certify that on May 6, 2011, I mailed the document by United States Postal

Service to the following non CM/ECF participants.

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