

**TUCSON UNIFIED SCHOOL DISTRICT**

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

<p>Roy and Josie Fisher, et al., Plaintiffs,</p> <p>v.</p> <p>Tucson Unified School District No. 1, et al., Defendants.</p>	<p>4:74-cv-00090-DCB (Lead Case)</p>
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<p>Maria Mendoza, et al. Plaintiffs,</p> <p>v.</p> <p>Tucson Unified School District No. 1, et al., Defendants.</p>	<p>CV 74-204 TUC DCB (Consolidated Case)</p>
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**NOTICE AND REQUEST FOR APPROVAL**

**JTED – TUSD PARTNERSHIP HIGH SCHOOL AT THE BRIDGES  
“THE BRIDGES HS”**

Tucson Unified School District – Legal Department  
1010 East 10<sup>th</sup> Street, Room 24  
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1 The Tucson Unified School District, No. 1 (“TUSD” or the “District”), hereby submits  
2 this Notice and Request for Approval to create a no-boundary, open-access, integrated high  
3 school to serve approximately 400 students in its first phase, the “Bridges HS.” If approved,  
4 the Bridges HS will be operated jointly by TUSD and the Pima County Joint Technical  
5 Education District (JTED). JTED will provide students access to JTED-facilitated Career  
6 and Technical Education (CTE) programs; TUSD will provide instruction in the core  
7 academic areas of Math, English Language Arts, Social Studies, and Science.

8 The District has held several discussions with the parties, submitted a draft  
9 Desegregation Impact Analysis (DIA), and responded to requests for information. The DIA  
10 reveals that the Bridges HS will be an integrated school, and it will not significantly affect  
11 surrounding schools or negatively impact the District’s ability to fulfill its obligations under  
12 the USP. The Bridges HS will bring together students from all over the city based on shared  
13 interests and, in this way, will operate to provide increased student and family engagement  
14 and unique, college and career opportunities for a diverse population of students.

15 TUSD’s Governing Board approved submission of this request on October 16, 2019.  
16 For these reasons, as described below, the District requests approval of this request.

17 **A. Background**

18 The Pima Joint Technical Education District is a public high school district that  
19 provides free career and technical education to high school students in Pima County to give  
20 them a head start on college and careers. Currently, students may attend JTED classes at one  
21 of its central campuses, or at satellite locations throughout the County (such as the culinary  
22 arts program located at Santa Rita High School).

23 The Bridges HS provides an opportunity for TUSD to create a new, integrated, high-  
24 tech high school to serve students seeking out strong CTE offerings. The first phase of the  
25 Bridges HS will include state-of-the-art classrooms and equipment, and will offer students  
26 opportunities to earn industry certificates and credentials, internships, externships, clinicals  
27 and dual college credit in many classes.

## 1 **B. Desegregation Impact Analysis**

2 The DIA projects the school will enroll approximately 70% of its students (about 270  
3 students) from TUSD schools, and approximately 30 of its students from other districts,  
4 charter schools, private schools, and home schooling (about 130 students). Many of the  
5 TUSD students will be from areas close to the school and, overall, will be slightly higher in  
6 Hispanic composition and slightly lower in Anglo composition than the district average.  
7 Student enrollment will be balanced by the 30% of students from other districts, charters,  
8 private schools, and home schooling who are expected to be relatively high in Anglo  
9 composition and relatively low in Hispanic composition. Both sets of students include  
10 African American populations that are similar to the District's averages. The Bridges HS  
11 will serve a student population that is more than two-thirds African American and Latino *and*  
12 that is integrated so that all students will enjoy the benefits of an integrated education.

13 The DIA also projects that almost every other TUSD high school will be affected, but  
14 that the relative number of students from each high school is small and the racial-ethnic  
15 composition is close to the existing composition, so the impacts are virtually nil (and may  
16 even relieve overcrowding at some high schools)<sup>1</sup>.

17 The DIA also assess potential impacts to District obligations under the USP. It will  
18 *further improve* integration by creating an integrated, no-boundary school that will increase  
19 the number of students attending integrated schools. No additional bus routes will be needed.  
20 TUSD will employ approximately 12-13 teachers, a few of whom may come from in-district  
21 (from reductions in FTEs at existing schools), and several who will come from out-of-district.  
22 No-boundary schools, like Dodge, traditionally have very good discipline rates as they attract  
23 students from diverse areas, and students and families recognize their enrollment is a  
24 privilege and not a right, leading to higher levels of student and family engagement. Given  
25 the focus on particular CTE areas, the school will not provide sports but will offer student  
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27 <sup>1</sup> Of the three nearby high schools, two are overcapacity (Tucson and Cholla) and a third is nearing  
28 capacity (Pueblo).

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1 council and at least one club in its first year. There are no projected impacts to other areas of  
2 USP implementation.

3 The DIA also includes several projections and other data charts and information that  
4 support the analysis. The District considers this a unique opportunity to create a strong  
5 partnership with JTED, as opposed to the potential for in-district competition were JTED to  
6 collaborate with another school district or open this campus on its own.

7 **Conclusion**

8 On October 18, 2019, the Governing Board approved the submission of this request to  
9 the Court for approval. The Special Master and Department of Justice have indicated some  
10 levels of preliminary support for the high school, the Fisher and Mendoza plaintiffs have not.  
11 The District looks forward to continuing conversations with the plaintiffs to respond to  
12 requests for information or to address remaining concerns, if possible, prior to the Special  
13 Master’s report and recommendation. This action will create an integrated school, create a  
14 strong partnership with JTED, will not significantly affect surrounding schools, and will not  
15 negatively impact the District’s ability to fulfill its obligations under the USP. The Bridges  
16 HS will bring together students from all over the city based on shared interests and, in this  
17 way, will operate to provide increased student and family engagement and unique, college  
18 and career opportunities for a diverse population of students.

19 For these reasons, as described above and in the attached DIA, the District respectfully  
20 requests approval.

21 Respectfully submitted on October 18, 2019.

22 **TUCSON UNIFIED SCHOOL DISTRICT**  
23 **LEGAL DEPARTMENT**

24 *s/ Samuel E. Brown*  
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**Certificate of Service**

**ORIGINAL** of the foregoing filed via the CM/ECF Electronic Notification System and transmittal of a Notice of Electronic Filing provided to all parties that have filed a notice of appearance in the District Court Case.

*s/ Samuel E. Brown*

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